The MIB Accountabilities Framework

July 2026

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Overview

Overview

In 2016, an individual accountability regime for banks was introduced by the PRA and FCA – the Senior Manager and Certification Regime (SMCR). It was later adopted for insurers in 2018 and was extended to all other regulated firms in 2019. Key aspects of SMCR relate to structural and organisational clarity, the identification of senior managers and clear descriptions of what they are responsible for. MIB is not obliged to implement SMCR. However, we place individual accountability high up on out cultural agenda as one of our core values.

Senior managers, within the Accountabilities Framework means, in the main the most senior people in the organisation who are allocated ownership of specific accountabilities.

We discussed and agreed to use the term 'accountabilities' rather than responsibilities, to reflect the fact that those accountable may delegate and share responsibilities but are held to account for the outcomes. Accountability is not shared, and those accountable must have the necessary resources, authority and collaboration to discharge their duties.

The MIB Accountabilities Framework is designed to provide clarity about the allocation of accountabilities across ExCo. One of the aims of the Accountabilities Framework is to produce Statements of Accountabilities which clearly set out the areas of accountability that each senior manager holds. Including how these accountabilities fit with the organisation's overall governance and management arrangements.

The Statement of Accountabilities have been drafted taking into account guidance from the Financial Conduct Authority Senior Managers Certification Regime, which highlighted good and poor practice examples.

Each Statement of Accountability includes details of any relevant:

- Prescribed Accountabilities. These are similar to those set out in SMCR and reflect the key areas of risk which tend to be common to all financial services firms.
- Overall Accountabilities. These are just as important as Prescribed Accountabilities and describe the other activities, business areas and functions of the firm, so there are no gaps.

In addition, details of out committees are included in our Governance Map, which include current members, the terms of references of Board committees and details of matters which the Board is responsible for.

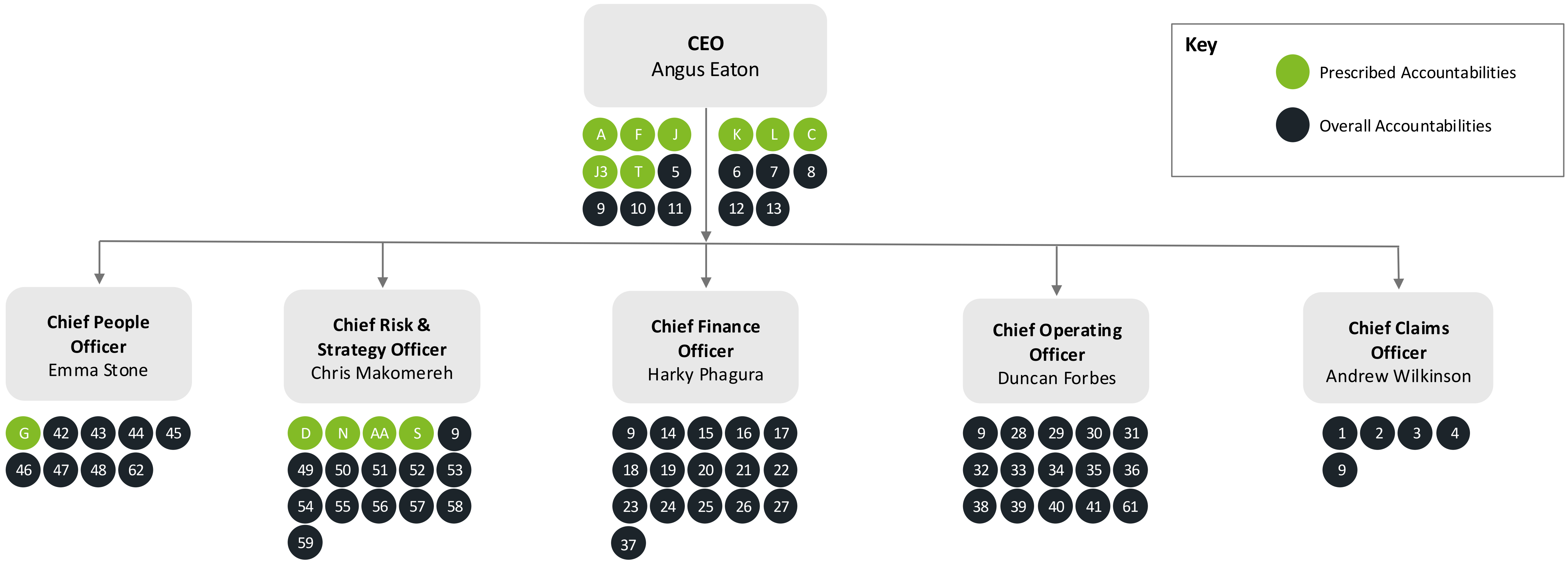
Within the regulated environment, roles that can create 'significant harm' are captured under the certification element of the regime and individuals are referred to as 'certified persons'. We have not applied this part of the regime to the framework.

In the regulated environment, firms have to assess whether certified persons are 'fit and proper' to perform their role. We do this through our vetting process for all colleagues and with reference checking to confirm senior managers as 'fit and proper' persons to hold their position. We also complete regular background and financial soundness checks for these individuals.

Finally, our Risk Management team conducts a bi-annual attestation process facilitating a discussion of how Senior Managers are fulfilling their accountabilities, whether any are not being met and what needs to be done to address deficiencies.

Accountabilities Map

Accountabilities Map



Note: Accountability 60 is with the Head of Internal Audit and does not feature on this ExCo list

Senior
Manager Roles

Senior Manager Roles

The following roles align to our current structure

SMF Ref	Role	Name
SMF1	Chief Executive Function	Angus Eaton
SMF2	Chief Finance Officer Function	Harky Phagura
SMF3a	Executive Director Function	Angus Eaton
SMF3b	Executive Director Function	Chris Makomereh
SMF3c	Executive Director Function	Harky Phagura
SMF4	Chief Risk Officer Function	Chris Makomereh
SMF5	Head of Internal Audit	Phil Lopez
SMF16	Compliance Oversight Function	Chris Makomereh
SMF18a	Other Overall Responsibility Function	Emma Stone
SMF18b	Other Overall Responsibility Function	Andrew Wilkinson
SMF24	Chief Operations Officer Function	Duncan Forbes

Prescribed Accountabilities

Prescribed Accountabilities

* SMF (Senior Management Function)
** PPF (Pension Protection Fund)

The SMF prescribed accountabilities have been reviewed against relevance to MIB, and any not relevant removed. A second lens of what the PPF align themselves to was then applied and considered, and a final proposed list of prescribed accountabilities for MIB was established.

SMF Ref	SMF mapping	Accountability	Proposed MIB Ex Co Accountability	Name	Included in PPF	Role responsible in PPF
(a)	SMF1	(1) Responsibility for the firm's performance of its obligations under the senior managers regime	CEO	Angus Eaton	Y	CEO
(d)	SMF16	(3) Responsibility for the firm's policies and procedures for countering the risk that the firm might be used to further financial crime	CR&SO	Chris Makomereh	Y	CRO
(f)	SMF1	(5) Responsibility for: (a) leading the development of; and (b) monitoring the effective implementation of; policies and procedures for the induction, training and professional development of all members of the firm's governing body.	CEO	Angus Eaton	N	N/A
(g)	SMF18a	(6) Responsibility for monitoring the effective implementation of policies and procedures for the induction, training and professional development of all the firm's: (a) SMF managers; and (b) key function holders; other than members of the firm's governing body.	CPO	Emma Stone	N	N/A

Prescribed Accountabilities

* SMF (Senior Management Function)
** PPF (Pension Protection Fund)

SMF Ref	SMF mapping	Accountability	Proposed MIB Ex Co Accountability	Name	Included in PPF	Role responsible in PPF
(j)	SMF1	(7) Responsibility for: (a) safeguarding the independence of; and (b) oversight of the performance of; the internal audit function, in accordance with the internal audit requirements for SMCR firms and the PRA requirements	CEO	Angus Eaton	Y	Chair of ARC
(k)	SMF1	(8) Responsibility for: (a) safeguarding the independence of; and (b) oversight of the performance of; the compliance function in accordance with the compliance requirements for SMCR firms.	CEO	Angus Eaton	Y	Chair of ARC
(l)	SMF1	(9) Responsibility for: (a) safeguarding the independence of; and (b) oversight of the performance of; the risk function, in accordance with the risk control requirements for SMCR firms and the PRA requirements referred to in column (2) of this row (9).	CEO	Angus Eaton	Y	Chair of ARC
(c)	SMF1	(12) Responsibility for compliance with the requirements of the regulatory system about the management responsibilities map	CEO	Angus Eaton	Y	CEO

Note that we have assigned the responsibilities for 7, 8 and 9 to CEO rather than NEDs

Prescribed Accountabilities

* SMF (Senior Management Function)
** PPF (Pension Protection Fund)

SMF Ref	SMF mapping	Accountability	Proposed MIB Ex Co Accountability	Name	Included in PPF	Role responsible in PPF
(n)	SMF3b	(13) Acting as the firm's whistleblowers' champion	CR&SO	Chris Makomereh	N	N/A
(aa)	SMF3b	(15) Responsibility for management of the firm's risk management processes in the UK	CR&SO	Chris Makomereh	N	N/A
(j-3)	SMF1 Re-allocation from SMF10	(18) Responsibility for taking reasonable steps to ensure that every person involved in the performance of the firm's internal audit function is independent from the persons who perform external audit, including: (a) supervision and management of the work of outsourced internal auditors; and (b) management of potential conflicts of interest between the provision of external audit and internal audit services.	Chair of ARC (CEO)	Angus Eaton	N	N/A
(s)	SMF16	(19) Responsibility for: (a) managing the firm's internal stress tests; and (b) ensuring the accuracy and timeliness of information provided to the FCA and other regulatory bodies for the purposes of stress testing.	CR&SO	Chris Makomereh	Y	CRO
(t)	SMF1	(21) Responsibility for the development and maintenance of the firm's business model by the governing body	CEO	Angus Eaton	Y	CEO

Overall Accountabilities

Overall Accountabilities

	Description of overall responsibility	Allocation	Name
1	Claims Strategy	CCO	Andrew Wilkinson
2	Claims Operations	CCO	Andrew Wilkinson
3	Control of Indemnity spend including Recoveries	CCO	Andrew Wilkinson
4	Future mobility and autonomous vehicle strategy	CCO	Andrew Wilkinson
5	MIB's Strategy & Delivery	CEO	Angus Eaton
6	Boards & Committees	CEO	Angus Eaton
7	Accountabilities	CEO	Angus Eaton
8	Governance Framework (incl. Environmental and Governance implementation (from ESG)	CEO	Angus Eaton
9	External Stakeholder Management & Government & Industry collaboration	CEO	Angus Eaton
10	Executive leadership	CEO	Angus Eaton
11	Internal stakeholder management	CEO	Angus Eaton
12	Public relations and communications	CEO	Angus Eaton

	Description of overall responsibility	Allocation	Name
13	Policy and legislative influence	CEO	Angus Eaton
14	Facilities and workplace management & Health, Safety & Environment	CFO	Harky Phagura
15	Levy setting and management	CFO	Harky Phagura
16	Insurance	CFO	Harky Phagura
17	Managing Managed services / client companies	CFO	Harky Phagura
18	External Audit	CFO	Harky Phagura
19	Legal compliance	CFO	Harky Phagura
20	Management information: Data	CFO	Harky Phagura
21	Third party / vendor management	CFO	Harky Phagura
22	Pension management	CFO	Harky Phagura
23	Cash flow management	CFO	Harky Phagura
24	Financial planning and control and business performance reporting	CFO	Harky Phagura

Overall Accountabilities

	Description of overall responsibility	Allocation	Name
25	Investment Management	CFO	Harky Phagura
26	Reinsurance Strategy	CFO	Harky Phagura
27	Internal and external money fraud management	CFO	Harky Phagura
28	Information Technology Strategy	COO	Duncan Forbes
29	Information Security Strategy	COO	Duncan Forbes
30	Operational Resilience - Implementation	COO	Duncan Forbes
31	Business Continuity	COO	Duncan Forbes
32	Disaster Recovery & Back up - Strategy	COO	Duncan Forbes
33	Data & Information Strategy	COO	Duncan Forbes
34	Contact Centre (PHL & OICL)	COO	Duncan Forbes
35	Cybersecurity and information protection: operational	COO	Duncan Forbes
36	Programme and project delivery: operational	COO	Duncan Forbes

	Description of overall responsibility	Allocation	Name
37	Change management framework	COO	Harky Phagura
38	Information Technology Operations & Service Delivery	COO	Duncan Forbes
39	Disaster Recovery & Back up - Implementation	COO	Duncan Forbes
40	Uninsured driving prevention: strategy	COO	Duncan Forbes
41	Uninsured driving prevention: strategy	COO	Duncan Forbes
42	Target Capability Model	CPO	Emma Stone
43	Organisational culture & values	CPO	Emma Stone
44	Employee value proposition	CPO	Emma Stone
45	Employee relations and legal compliance	CPO	Emma Stone
46	Pay, reward and benefits governance	CPO	Emma Stone
47	Strategic workforce planning, talent and development	CPO	Emma Stone
48	Social development and oversight	CPO	Emma Stone

Overall Accountabilities

	Description of overall responsibility	Allocation	Name
49	Strategy development and oversight	CR&SO	Chris Makomereh
50	GDPR and Data protection	CR&SO	Chris Makomereh
51	Regulatory compliance and governance	CR&SO	Chris Makomereh
52	Member company compliance	CR&SO	Chris Makomereh
53	Whistleblowing	CR&SO	Chris Makomereh
54	Risk Management Framework	CR&SO	Chris Makomereh
55	Complaints management	CR&SO	Chris Makomereh
56	ESG framework development	CR&SO	Chris Makomereh
57	Financial Crime compliance	CR&SO	Chris Makomereh
58	Operational Resilience: Framework	CR&SO	Chris Makomereh
59	DSARs - Framework	CR&SO	Chris Makomereh
60	Internal Audit	HoIA	Phil Lopez
61	Data Subject Access Requests (DSARs) – Operational	COO	Duncan Forbes
62	Data Subject Access Requests (DSARs) – Employee	CPO	Emma Stone

Statements of Accountabilities

Chief Claims Officer

* SMF (Senior Management Function)

Role Holder: Andrew Wilkinson

SMF18b: Other overall responsibility function

The Chief Claims Officer has overall responsibilities for setting the MIB strategy in relation to claims. Day to day management of MIBs claims services under the Uninsured and Untraced Drivers Agreements

Key Committees

- Executive Committee (member)
- Claims Advisory Board (member)
- Levy Committee (member)
- Audit & Risk Committee (attendee)

PRESCRIBED ACCOUNTABILITIES

Ref	Prescribed Responsibility	Further details
	None	

OVERALL ACCOUNTABILITIES

Ref	Title	Further details
1	Claims Strategy	**Setting and implementing the MIB strategy in relation to Claims** Ensure that MIB is seen as the industry claims expert, implementing a clear claims strategy and engaging and aligning key market members. Working with the Technical committee and wider market forums to ensure there is confidence in MIB approach.
2	Claims Operations	**Management and running of the Claims operations, including Large Loss, Mainstream claims and PPOs** Ensure the technical claims team is a centre of customer & operational excellence for the industry, driving efficiency through continuous improvement and operational measurement. Effective and robust control of claims and recoveries.
3	Control of indemnity spend including Recoveries	**Managing indemnity spend and supporting the Finance team forecast future spend and claims recoveries** Ensure that MIB optimises claims spend & recoveries to support a metronomic levy for the market and its customers maximising the opportunities presented.
4	Future mobility and autonomous vehicle strategy	**Implementing the MIB strategy in relation to future mobility, connected and autonomous vehicles** Ensure that MIB has a clear strategy for future mobility and adoption of autonomous/connected electric vehicles that influences the industry; integrating this to further our strategic ambition to remove uninsured and reduce untraced drivers.

Chief Claims Officer

* SMF (Senior Management Framework)

Role Holder: Andrew Wilkinson

OVERALL ACCOUNTABILITIES

Ref	Title	Further details
9	External Stakeholder Management & Government & Industry collaboration	Represent the interests of MIB and the industry, and ensure good working relationships when dealing with stakeholders and government. **Claimants (Stakeholders who seek compensation through MIB, including those impacted by uninsured or untraced drivers, and their legal or administrative representatives);** Claimants (direct and represented), Claimant solicitors and representative bodies (Association of Personal Injury Lawyers (APIL) & Motor Accident Solicitors Society (MASS), Foreign bureau claims handlers/handling agents and Member Agreement implementation. **Government Agencies UK & International (Government departments and affiliated bodies in the UK and internationally that influence or regulate MIB's statutory remit and policy environment);** CCAV
N/A	Line Management responsibility	The CCO has line management responsibility for:- • Head of Technical & Major Loss • Head of Customer Operations • Future Mobility Strategy Leader

Chief Executive Officer

* SMF (Senior Management Function)

Role Holder: Angus Eaton

SMF1: Chief Executive function
SMF3a: Executive Director function

The Chief Executive Officer has overall responsibilities for leading the MIB. The CEO is responsible for MIB being accountable to is stakeholders, for building and retaining market and public confidence in MIB.

The CEO is responsible for developing, proposing and implementing the MIB strategy with senior leadership, as approved by the Board.

The CEO is responsible for the leadership of the organisation and managing it within the authorities delegated by the Board.

Key Committees

- MIB Board (Executive Director)
- Executive Committee (Chair)
- Audit & Risk Committee (member)
- Investment Committee (member)
- Levy Group (member)
- Nomination Committee (attendee)
- Remuneration Committee (attendee)
- Claims Advisory Board (member)
- Executive Security Steering Group (ESSG) (member)

PRESCRIBED ACCOUNTABILITIES

Ref	Prescribed Responsibility	Further details
A	(1) Responsibility for the firm's performance of its obligations under the senior managers regime	The CEO is responsible for ensuring the allocation and adherence of the core principles of the Senior Manager and Certification Regime to MIB's activities.
F	(5) Responsibility for: (a) leading the development of; and (b) monitoring the effective implementation of; policies and procedures for the induction, training and professional development of all members of the firm's governing body.	The CEO is responsible for ensuring the Board induction processes are adequate and there is ongoing relevant training and development of board members to maintain the capabilities required.
J	(7) Responsibility for: (a) safeguarding the independence of; and (b) oversight of the performance of; the **internal audit function**, in accordance with the internal audit requirements for SMCR firms and the PRA requirements	The CEO is responsible for ensuring that the Internal Audit function is independent from influence by management and oversight of the performance of the function. The Head of Internal Audit has a direct reporting line into the CEO, and dotted line into the Chair of the Audit and Risk Committee.

Chief Executive Officer

* SMF (Senior Management Framework)

Role Holder: Angus Eaton

PRESCRIBED ACCOUNTABILITIES

Ref	Prescribed Responsibility	Further details
K	(8) Responsibility for: (a) safeguarding the independence of; and (b) oversight of the performance of; the **compliance function** in accordance with the compliance requirements for SMCR firms.	The CEO is responsible for ensuring the Risk & Compliance functions operate independently of management to facilitate robust oversight by these functions. The Chief Risk & Strategy Officer reports into the CEO and has a dotted reporting line into the Chair of the Audit and Risk Committee.
L	(9) Responsibility for: (a) safeguarding the independence of; and (b) oversight of the performance of; the **risk function**, in accordance with the risk control requirements for SMCR firms and the PRA requirements	
C	(12) Responsibility for **compliance with the requirements of the regulatory system** about the management responsibilities map	This is separate from the role of Compliance oversight which is a second line function. Rather this relates to compliance with MIB's application of the Senior Manager and Certification Regime.

Chief Executive Officer

* SMF (Senior Management Function)

Role Holder: Angus Eaton

PRESCRIBED ACCOUNTABILITIES

Ref	Prescribed Responsibility	Further details
J3	(18) Responsibility for taking reasonable steps to ensure that every person involved in the performance of the firm's internal audit function is independent from the persons who perform external audit, including: (a) supervision and management of the work of outsourced **internal auditors**; and (b) management of potential conflicts of interest between the **provision of external audit and internal audit services**.	The CEO is responsible for ensuring that the Internal Audit function is independent from influence by management and oversight of the performance of the function. The Head of Internal Audit has a direct reporting line into the CEO, and dotted line into the Chair of the Audit and Risk Committee.
T	(21) Responsibility for the development and maintenance of the **firm's business model by the governing body**	The CEO is responsible for developing, proposing and implementing the MIB's overall strategy and business model (subject to approval by the Board), and for ensuring that the MIB's long-term funding model is sustainable and delivers value for money.

Chief Executive Officer

* SMF (Senior Management Function)

Role Holder: Angus Eaton

OVERALL ACCOUNTABILITIES

Ref	Title	Further details
5	MIB's Strategy & Delivery	The CEO is responsible for developing, proposing and implementing the strategy of MIB (subject to Board approval), the formulation of which the Board will be actively involved in. Providing regular updates to the Board.
6	Boards & Committees	Ensure that the Boards and Board Sub-Committees are well run and have sufficient oversight of their respective aspects of the business.
7	Accountabilities	Allocate and delegate accountabilities across the Executive Committee ensuring clarity and ownership.
8	Governance Framework incl. Environmental & Governance Implementation (from ESG)	Develop and oversee the implementation of the governance manual to ensure efficient and effective oversight of MIB's management and operations. Ensure that MIB has appropriate, environmentally sustainable practices and is a safe place to work. Balancing the needs of our colleagues with cost effectiveness; ensuring all activities and facilities are meeting Health and Safety obligations.
9	External Stakeholder Management & Government & Industry collaboration	Represent the interests of MIB and the industry, and ensure good working relationships when dealing with stakeholders and government. CEO is accountable for the following stakeholder relationships; **Customer (Stakeholders who pay MIB through levies or fees for services/data);** Member insurers & MIB Agreements (Board level) **Motor Insurance Trade Bodies (Industry bodies and organisations that represent, support or provide services to motor insurers);** British Insurance Brokers Association (BIBA), Motor industry suppliers; Thatcham Research Society of Motor Manufacturers & Traders (SMMT) **Government Agencies UK & International (Government departments and affiliated bodies in the UK and internationally that influence or regulate MIB's statutory remit and policy environment);** DfT, Home Office, HM Treasury, Government Ministers & MPs & Council of Bureau (CoB)

Chief Executive Officer

* SMF (Senior Management Function)

Role Holder: Angus Eaton

OVERALL ACCOUNTABILITIES

Ref	Title	Further details
10	Executive leadership	Build, lead, coach and retain a high performing and cohesive Executive Committee to deliver the organisation's objectives and aspirations.
11	Internal stakeholder management	Proactively keep the Chairman and Group Boards aware of progress towards achieving MIB's strategic objectives and all other relevant matters to ensure understanding of MIB's performance. Maintain effective networks with all principal stakeholders, and as appropriate, represent the MIB on Boards, Committees etc. to ensure the organisation's profile and objectives are considered when decisions involving the MIB are made by others. Excellent working relationships with MIB and Group Boards and management at all levels.
12	Public relations and communications	Develop and maintain an effective communication, marketing and public relations strategy to promote the products, services and mission of the MIB and enable it to articulate and apply its corporate philosophy and values. Seek opportunities to expand and promote the role of the organisation to increase its benefit to the industry and wider community. Ensure appropriate strategic planning to protect MIB's reputation in the event of a crisis situation or large scale PR issue eg disruption to key service, cyber attack, public criticism, employee scandal.
13	Policy and legislative influence	Promote policies and use of political influence to advance MIB's strategic objectives. Ensure good working relationships with key insurance industry and government representatives, including the ABI committees – Motor Committee, Personal Injury Committee and GI Legacy Committee.

Chief Executive Officer

* SMF (Senior Management Function)

Role Holder: Angus Eaton

OVERALL ACCOUNTABILITIES

Ref	Title	Further details

N/A	Line Management responsibility	• The CEO has line management responsibility for:-
		• Executive Committee members
		    o Chief Claims Officer
		    o Chief Finance Officer
		    o Chief Operating Officer
		    o Chief People Officer
		    o Chief Risk & Strategy Officer
		• Head of Internal Audit
		• Head of Brand & Communications
		• Head of Government & International Relations
		• Business Manager
		• EA to CEO & EA Team Line Manager

Chief Finance Officer

* SMF (Senior Management Framework)

Role Holder: Harky Phagura

SMF2: Chief Finance Officer function
SMF3c: Executive Director function

The Chief Finance Officer reports to the CEO and the role aligns with the Senior Manager Regime through the SMF2 function. As a member of the Board, to ensure that MIB has the funding, oversight, control and governance to deliver its strategy within the boundaries of legal and regulatory guidelines and standards.

Ensuring that leaders across the business are equipped with the information and support to make sound commercial decisions about spend, sourcing, and planning, procuring, contracting and managing third party suppliers effectively and relentlessly searching for the most commercial, cost-effective way to deliver. To ensure that MIB staff have access to a safe, compliant and environmentally conscious place of work and that MIB meets its Health & Safety obligations.

Key Committees

- MIB Board (Executive Director)
- Executive Committee (member)
- Investment Committee (member)
- Levy Group (member)
- Audit & Risk Committee (member)
- Executive Security Steering Group (ESSG) (member)

PRESCRIBED ACCOUNTABILITIES

Ref	Prescribed Responsibility	Further details
	None	

OVERALL ACCOUNTABILITIES

Ref	Title	Further details
9	External Stakeholder Management & Government & Industry collaboration	Represent the interests of MIB and the industry, and ensure good working relationships when dealing with stakeholders and government. CFO is accountable for the following stakeholder relationships; **Customer (Stakeholders who pay MIB through levies or fees for services/data);** Member Insurers (Levy) & Client companies **Regulators (Public bodies responsible for overseeing compliance with applicable regulation);** HM Revenue & Customs
14	Facilities & workplace management & Health, Safety & Environment implementation	Ensure that MIB has appropriate, environmentally sustainable practices and is a safe place to work. Balancing the needs of our colleagues with cost effectiveness; ensuring all activities and facilities are meeting Health and Safety obligations.
15	Levy setting and management	To deliver a metronomic, stable, predictable and sustainable levy, working with the Board, the Levy Committee, the Executive Committee, technical and external experts to ensure that the annual levy round is supported by the market, enables MIB's strategic ambition and ensuring appropriate funds are available.
16	Insurance	Oversee and implement MIB's corporate insurance and reinsurance policies in accordance with legislation and the business's risk appetite.

Chief Finance Officer

* SMF (Senior Management Function)

Role Holder: Harky Phagura

OVERALL ACCOUNTABILITIES

Ref	Title	Further details
17	Managing Managed services / client companies	Ensure that the MIB managed services (including OIC, CPL, IFB, ELTO) are governed and led effectively in alignment with their terms of reference and articles and are contributing effectively to the MIB strategic ambition. Ensure managed service agreement targets and commitments are being met; holding Executive Committee colleagues to account as appropriate. Ensure pricing for services are compliant with competition law.
18	External Audit	Monitor the integrity of the financial statements and review the planned activity, results, effectiveness and independence of External Audit. Providing information in a timely manner to External Audit to support an efficient reporting process.
19	Legal compliance	The Head of Legal reports to the CFO. The legal function provides advice which seeks to mitigate legal risks across MIB.
20	Management information: Data	Enable effective decision making through the provision of accurate, timely, engaging and accurate business analytics and internal and external MI (e.g. Insurers & internal MIB).
21	Third party / vendor management	Ensure that the business has the resources to deliver its strategic ambition either directly or through the procurement, contracting and ongoing management of third-party partnerships, ensuring that plans and assessments are commercially appropriate, legally assessed, compliant and cost-effective.
22	Pension management	Manage the pension scheme effectively, whereby funds are invested wisely, the scheme is administered properly, and all legal and regulatory obligations are met.
23	Cash flow management	Optimise the cash-flow through rigorous control and planning to minimise debt and ensure MIB maximises all available tax and legal opportunities.
24	Financial planning and control and business performance reporting	Establish a framework of performance measures (OKRs and EKPIs that enable effective prioritisation, and direct and manage MIB's financial, procurement and legal activities to drive the effective delivery of MIB's strategy and business plan in accordance with industry best practice and the latest thought leadership.

Chief Finance Officer

* SMF (Senior Management Framework)

Role Holder: Harky Phagura

OVERALL ACCOUNTABILITIES

Ref	Title	Further details
25	Reinsurance Strategy	Ensure that MIB makes sound investments in line with our risk appetite, working with the Investment Committee to maximise our opportunities and ensure all decisions are appropriately planned, agreed and governed.
26	Investment Management	To lead the MIB Terrorism reinsurance strategy and implementation in a cost efficient and timely way.
27	Internal and external money fraud management	Ensure MIB has robust preventative and detective controls against internal and external money fraud.
37	Change management framework	Ensure that MIB has the appropriate governance mechanisms in place to effectively and successfully delivery programme & projects of transformation, change and continuous improvement to time, quality and cost targets.
N/A	Line Management responsibility	Head of Legal Finance & Business Performance Director Head of Client Company Management Director – IFB H&S/Facilities Manager Head of Value Management

Chief Operating Officer

* SMF (Senior Management Function)

Role Holder: Duncan Forbes

SMF24: Chief Operations function

The Chief Operating Officer reports to the CEO and the role aligns with the Senior Managers Regime programme through the SMF24 (Chief Operations Office function).

To coordinate the activities of MIB, industry bodies, members, external experts and key stakeholders in government, public service and the motor industry to reduce untraced and remove uninsured drivers from UK roads.

To ensure, through the delivery of expert services and appropriate technology, that MIB is seen as a trusted custodian of accurate data and, working with members, key partners and the Executive Committee to ensure that MIB is seen as an organisation that can deliver solutions to cross industry issues while still operating as not-for-profit and competitively neutral.

Key Committees

- Executive Committee (member)
- Executive Security Steering Group (ESSG) (Chair)
- Audit & Risk Committee (attendee)

PRESCRIBED ACCOUNTABILITIES

Ref	Prescribed Responsibility	Further details
	None	

OVERALL ACCOUNTABILITIES

Ref	Title	Further details
9	External Stakeholder Management & Government & Industry collaboration	Represent the interests of MIB and the industry, and ensure good working relationships when dealing with stakeholders and government. COO is accountable for the following stakeholder relationships; **Customer (Stakeholders who pay MIB through levies or fees for services/data);** Member insurers (relationships & day to day operations) and Data provenance companies (fee paying) **Motor Insurance Trade Bodies: Industry bodies and organisations that represent, support or provide services to motor insurers;** Member suppliers / data services provider; Polaris **Government Agencies UK & International; Government departments and affiliated bodies in the UK and internationally that influence or regulate MIB's statutory remit and policy environment);** DVLA, Ministry of Justice (MoJ) & Police Forces
28	Information Technology Strategy	Ensure that MIB has the information technology resources, support and capability, now and in the future, to integrate enterprise-wide capabilities; enabling colleagues to add value, minimise transactional tasks and work productively, to drive operational delivery and collaboration within and outside of the business.
29	Information Security Strategy	Ensure that MIB has a clear strategy for managing information security and cyber risk, tailored to its threat landscape. That there is a robust approach in place to protect MIB from cyber-attacks and that everyone in MIB is aware of their obligations and the best practice way to ensure our cyber and information security.

Chief Operating Officer

* SMF (Senior Management Function)

Role Holder: Duncan Forbes

OVERALL ACCOUNTABILITIES

Ref	Title	Further details
30	Operational Resilience: Implementation	Implement the Operational Resilience framework and ensure that MIB has robust business continuity systems to preserve operational delivery and resilience to minimise disruption.
31	Business Continuity	
32	Disaster Recovery and Back-up Strategy	Ensure MIB has a clear approach to Disaster Recovery for its systems, outlining what system back-up and DR testing should be done and at what frequency.
33	Data & Information Strategy	Ensure that MIB is a trusted custodian of the industry's data, and that stakeholders, members and partners can digitally access accurate and consistently available, submit data, secure quality data services, driving improved data standards with and through members.
34	Contact Centre (PHL & OICL)	The COO is responsible for the effective running and oversight of the Police Helpline and Official Injury Claims service.
35	Cyber and information security implementation (operational)	Ensure that MIB has adequate systems, processes and tools to protect and secure the integrity of the data we hold in accordance with the Information Security Strategy.
36	Programme and project delivery: operational	Establish and lead appropriate delivery capability, governance boards/steering committees, balancing service to customers with change delivery, monitoring cost and impact on colleagues.

Chief Operating Officer

* SMF (Senior Management Function)

Role Holder: Duncan Forbes

OVERALL ACCOUNTABILITIES

Ref	Title	Further details
38	Information Technology Operations & Service Delivery	Ensure that the operational teams deliver customer and operational excellence for the industry and other stakeholders; using appropriate tools to drive effectiveness and efficiency through continuous improvement, operational measurement & reporting and there is a relentless focus on service delivery and reducing uninsured driving.
39	Disaster Recovery and Systems back-up Implementation	Accountability for handling operational and technical incidents. This includes coordinating with relevant teams to ensure incidents are identified, managed and reported and relevant remedial actions are taken where required.
40	Data services pricing and revenue management	The COO is responsible for ensuring MIB has a Pricing framework for its data services that is compliant with Competition Law and keeps the MIB cost neutral for delivering the services.
41	Uninsured driving prevention: strategy	Ensure that MIB has access to the appropriate data processing, analytic and insight capacity, capability and expertise to identify and proactively deliver on opportunities to enable stakeholders and partners remove uninsured drivers.
61	Data Subject Access Requests (DSARs): Operational	Accountability for the processing of DSARs according to the framework detailed. Work with the GPO team for guidance and support. Also work with Claims team for complex DSAR cases and extra capacity.
N/A	Line Management responsibility	The COO has line management responsibility for:- • Head of Information Security & ODT Governance • Technology Director • Strategic Consultant - UDP • Head of Customer Delivery Services • Head of Value Stream: Data • Programme Director

Chief People Officer

* SMF (Senior Management Framework)

Role Holder: Emma Stone

SMF18a: Other overall responsibility function

The Chief People Officer reports to the CEO and has overall responsibilities for leading the People function and setting the MIBs strategy as it relates to People.

Key Committees

- Executive Committee (member)
- Nomination Committee (attendee)
- Remuneration Committee (attendee)

PRESCRIBED ACCOUNTABILITIES

Ref	Prescribed Responsibility	Further details
G	(6) Responsibility for monitoring the effective implementation of policies and procedures for the induction, training and professional development of all the firm's: (a) SMF managers; and (b) key function holders; other than members of the firm's governing body.	The CPO has responsibility for providing resources for professional development of colleagues, access to training and development to ensure continued learning and development of MIB's people.

OVERALL ACCOUNTABILITIES

Ref	Title	Further details
42	Target Capability/ Operating Model	Ensure that MIB has a clear Target Capability/Operating Model that integrates our enterprise capabilities, enables cost effective functional, team and role design and lays out clear expectations of how we operate and behave so that our organisation and colleagues are productive, capable, confident and sustainable and healthy.
43	Organisational culture & values	To ensure that MIB colleagues are engaged and passionate advocates of its strategic ambition, that there is a clear and regular opportunity for colleagues to have a say in and add value to MIB delivery, change and ways of working and that every colleague feels a sense of belonging, inclusivity, diversity and equity (BIDE) particularly those from underrepresented communities. Act as a voice for all those perspectives at the executive committee.

Chief People Officer

* SMF (Senior Management Function)

Role Holder: Emma Stone

OVERALL ACCOUNTABILITIES

Ref	Title	Further details
44	Employee value proposition	Ensure that MIB has a clearly defined value proposition and employee experience that lays out what our colleagues should expect from MIB in both what and how we operate, that our overall employment offer matches this and that we consistently deliver on that employment offer in the way we operate and behave.
45	Employee relations and legal compliance	To ensure that MIB meets its contractual, moral and legal duties as an employer, effectively managing its employee relations, contracts, key people policies, paying people accurately and on time, and any changes to colleagues work, pay or role; transparently, fairly and within appropriate legal and best practice guidelines, ensuring that leaders have access to trusted appropriate expert advice and a clear framework to allow them to meet those duties, balancing delivery, organisation effectiveness, commercial concerns and the needs of MIB colleagues.
46	Pay, reward and benefits governance	As a key partner to the Chief Executive Officer and the members of the Remuneration and Nominations committee, ensure that there are appropriate, fair and properly governed pay, incentive & reward and benefits frameworks in place to facilitate MIB strategic ambition, attract talent and retain its most critical people now and in the future and that senior executive pay and reward structures are appropriately managed, challenged and governed.
47	Strategic workforce planning, talent and development	Ensure that MIB has the right capability and capacity to deliver on its strategic ambition with a clear approach to cost effectively balance external sourcing, internal skills development, growing the careers of our colleagues, talent mapping & succession planning and the appropriate use of contingent expertise.

Chief People Officer

* SMF (Senior Management Function)

Role Holder: Emma Stone

OVERALL ACCOUNTABILITIES

Ref	Title	Further details
48	Social development and oversight	Development of the 'Social' dimension of the MIB ESG strategy. Informing how MIB will measure and implement it.
62	Data Subject Access Requests (DSARs): Employee	Accountability for the processing of employee related DSARs, according to the agreed framework and guidance.
N/A	Line Management responsibility	The CPO has line management responsibility for:- Head of People Partnering People Value Stream Lead Head of People Operations Head of Organisational Capability

Chief Risk & Strategy Officer

* SMF (Senior Management Function)

Role Holder: Chris Makomereh

SMF16: Chief Risk Officer function
SMF3b: Executive Director function

The Chief Risk & Strategy Officer reports to the CEO. The SMF4 is responsible for defining, owning and the ongoing development of the MIBs Risk Management Framework. The role aligns with the Senior Managers Regime through the SMF4 function and also has responsibility for Strategy formulation as delegated to by the CEO.

Key Committees

- MIB Board (Executive Director)
- Executive Committee (member)
- Audit & Risk Committee (member)
- Investment Committee (attendee)
- Levy Group (attendee)
- Compliance Management Committee (chair)
- Executive Security Steering Group (ESSG) (member)

PRESCRIBED ACCOUNTABILITIES

Ref	Prescribed Responsibility	Further details
D	(3) Responsibility for the firm's policies and procedures for countering the risk that the firm might be used to further financial crime	
N	(13) Acting as the firm's whistleblowers' champion	
AA	(15) Responsibility for management of the firm's risk management processes in the UK	
S	(19) Responsibility for: (a) managing the firm's internal stress tests; and (b) ensuring the accuracy and timeliness of information provided to the FCA and other regulatory bodies for the purposes of stress testing.	Noting that MIB is not regulated therefore the stress testing framework is for internal use

Chief Risk & Strategy Officer

* SMF (Senior Management Function)

Role Holder: Chris Makomereh

OVERALL ACCOUNTABILITIES

Ref	Title	Further details
9	External Stakeholder Management & Government & Industry collaboration	Represent the interests of MIB and the industry and ensure good working relationships when dealing with stakeholders and government. CR&SO is accountable for the following stakeholder relationships; **Motor Insurance Trade Bodies** (Industry bodies and organisations that represent, support or provide services to motor insurers); Association of British Insurers (ABI) **Regulators (Public bodies responsible for overseeing compliance with applicable regulation);** Information Commissioners Office (ICO), Financial Conduct Authority (FCA) & Prudential Regulatory Authority (PRA)
49	Strategy development and oversight	Ensure that MIB is maintaining and developing a fit for purpose strategy and challenging and critiquing delivery plans and strategic capability in every area of the business to achieve its mission and purpose, exploiting every opportunity, within the framework of being competitively neutral and not for profit, to reduce uninsured and untraced driving. Lead CUE Transformation as of June 26.
50	GDPR and Data protection	Ensure that MIB is meeting its legal and reporting obligations to the General Data Protection Regulation (GDPR), that there are adequate controls, processes and systems in place to ensure MIB to ensure our data is compliant, transparent, accessible and kept confidential.
51	Regulatory compliance and governance	Ensure that MIB is compliant with all relevant legal, regulatory & compliance reporting requirements and has appropriate policies, systems and processes in place to enable a culture of compliance and reporting. Ensure that MIB and the Board is adequately prepared for regulation; that business understands and has appropriate plans, policies, systems and processes in place to meet any future regulatory or compliance obligations & that MIB engages with regulatory bodies to understand and mitigate plans.
52	Member company compliance	Ensure ongoing audits of client company database usage and reporting results to Client Company boards in a timely manner.
53	Whistleblowing	To ensure that MIB has in place an effective process and approach to whistleblowing, making sure that those raising concerns are protected according to the law, that allegations are properly and fully investigated and that, working with the Chief People Officer, if allegations are upheld, perpetrators are dealt with appropriately.

Chief Risk & Strategy Officer

* SMF (Senior Management Function)

Role Holder: Chris Makomereh

OVERALL ACCOUNTABILITIES

Ref	Title	Further details
54	Risk Management Framework	Ensure that MIB makes risk-based decisions at all levels and in all areas of the organisation supported by a framework of controls and processes for the consistent and coherent identification, measurement, management, monitoring and reporting of the risks. To ensure that the business understands and is relentlessly and proactively working to mitigate enterprise-level risks and significant risks, working with the Audit and Risk committee to establish a clear risk appetite, report, validate and test mitigations and ensure that key deadlines and actions are being met fully.
55	Complaints management	Ensure complaints are resolved within SLAs and themes emerging from complaints are compiled and reported back to management for improvements.
56	ESG framework development	To ensure that MIB has a clear and appropriate Environmental, Social and Governance (ESG) strategy, with clear targets that will be operationalised and delivered by the Chief Finance (E & G) and Chief People (S) Officers and manages the delivery of key reporting obligations for ESG.
57	Financial Crime compliance	The CRSO has responsibility for ensuring sanctions compliance checks are carried out and reported.
58	Operational Resilience - Framework	Develop and maintain oversight of the Operational Resilience framework in line with regulatory standards.
59	Data Subject Access Requests (DSARs): Framework	Accountability for providing guidance, oversight and support to all functions carrying out DSAR processing. Occasionally supporting the teams where complexity and uncertainty dictate it.
N/A	Line Management responsibility	The CR&SO has line management responsibility for:- • Head of Risk Management • Head of Compliance & DPO • Audit & Compliance Manager • Risk Advisor

Head of Internal Audit

* SMF (Senior Management Function)

Role Holder: Phil Lopez

SMF5: Head of Internal Audit function

Key Committees

- Audit & Risk Committee (member)

PRESCRIBED ACCOUNTABILITIES

Ref	Prescribed Responsibility	Further details
	None	

OVERALL ACCOUNTABILITIES

Ref	Title	Further details
60	Internal Audit	Responsible for the delivery of an annual audit opinion to the Audit & Risk Committee on the overall effectiveness of the MIB's framework of governance, risk management and control.
N/A	Line Management responsibility	Senior Internal Auditor Audit Manager