



Regulatory Update

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RR Compliance Associates are a trading style of R&R Compliance Consultants Ltd, a limited company registered in England and Wales (company number 12070286). Our registered office is 51 Lime Street, London, EC3M 7DQ. VAT number 326 1938 96.

REGULATORY UPDATES

Stay ahead of regulatory changes with our regulatory updates, expert insights, and industry best practices – just read the update below and share with colleagues.

Need Help? Speak to Our Experts!

Book a free consultation and get **tailored compliance solutions** to navigate FCA, ICO or EEA related regulations with ease.

[Book a Free Consultation](#)

Download Our Free Desk Aids

We have issued a number of free desk-aid to assist you with understanding, self-assessment and implementation.

- ✓ Download the latest free desk-aid today to evidence compliance

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Stay compliant with automated, real-time checks against global sanctions lists and politically exposed persons (PEPs).

- ✓ Accurate & fast AML screening
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- ✓ User-friendly interface & seamless integration

Update	Summary	Action for firms
<p>FCA stance on broker remunerations</p> <p>Applies to: UK intermediaries</p>	<p>The FCA has re-ignited its spotlight on insurance broker remuneration, pushing for full transparency around how brokers get paid. Whether it's commission, fees, or contingent bonuses, firms must ensure clients are crystal clear on where the money flows—and why.</p> <p>Brokers typically earn via:</p> <ul style="list-style-type: none"> • Commissions – paid by insurers as a percentage of the premium. • Fees – charged directly to clients, often in complex or bespoke arrangements. • Combined Models – where brokers receive both commission and fees. • Contingent Commissions – performance-based incentives from insurers. • Other Perks – including bonuses or promotional incentives. <p>The structure isn't the issue—the opacity is.</p> <p>Where there are concerns, the FCA can initiate enforcement actions. The FCA's toolkit includes:</p> <ul style="list-style-type: none"> • IDD (Insurance Distribution Directive) – mandates disclosure of all remuneration sources to avoid conflicts of interest. • ICOBS (Insurance Conduct of Business Sourcebook) – requires firms to clearly communicate costs and remuneration structures. • Product Governance Rules – force brokers to act in the best interest of the client, especially on renewals, which often disadvantage loyal customers. <p>The FCA's core goal? Ensure customers aren't kept in the dark.</p>	<p>Action to Take:</p> <ul style="list-style-type: none"> • Review your remuneration models and client disclosures • Train your teams on how to explain these clearly • Map commission arrangements against fair value and conflict of interest expectations • Audit your renewal practices to avoid “price walking” risks <p>Need help reviewing your arrangements or preparing for an FCA challenge – contact us today for an independent review.</p>

Update

Summary

Action for firms

New Form A

Applies to:
All firms

The FCA has launched a redesigned **Form A** – the essential application for individuals seeking approval to perform **Senior Management Functions (SMFs)** and other controlled functions. The changes follow extensive user testing and feedback from firms, with the goal of making the form simpler, more intuitive, and less duplicative. This update affects all standalone Form A submissions via **Connect**, except those linked to authorisation or variation of permission (VoP) applications.

New Updates:

- **No more CV uploads** (for solo-regulated firms).
- Mandatory **10-year employment history** entered directly in the form.
- Additional questions on:
- **Right to work in the UK**
- **Previous names** shown on the FS Register
- **Time commitment and role spread** across directorships and activities

Functional Improvements:

- **SOR integrated** into the application – no need for a separate Statement of Responsibilities form.
- **"Send later" option removed** to streamline submission.
- Enhanced **virus scanning** for attachments.

User Experience Upgrades:

- Pre-application **checklist** provided
- Better **help text and guidance**
- Improved **navigation and layout**

Action to Take:

1. Read the publication [here](#).

RRCA can help:

- Audit your current SMF application process
Ensure your SOR content aligns with new integration
Support candidates in preparing FCA-compliant submissions
Provide a full compliance check before final Connect submission

Update

Summary

Action for firms

FCA Reminder: Keep Your Firm's Details Up to Date

Applies to:
All firms

The FCA has re-emphasised the importance of keeping firm information accurate and current via Connect. This includes names, contact details, trading names, and appointed representative relationships.

Outdated or incorrect information can result in **missed regulatory communications, non-compliance** with reporting duties, and **public-facing errors** on the Financial Services Register.

Firm Details Attestation (FDA)

If your firm is authorised under FSMA (whether solo or dual-regulated), you must complete the **Firm Details Attestation** annually:

- Submit via **Connect**
- Within **60 business days** of your firm's financial year-end
- Confirm, amend (if needed), and submit the attestation
- This requirement falls under **SUP 16.10** of the FCA Handbook.

Directory Persons' Attestation (DPA)

Separately, firms must also **review and confirm Directory Persons data** annually. This ensures the FS Register accurately reflects your firm's Senior Managers and Certified Persons.

Other Common Firm Detail Updates Include:

- Registered office or principal place of business
- New or retired **appointed representatives**
- Changes to **trading names**
- Sensitive business name notifications

Firms registered with Companies House must ensure consistency between FCA and Companies House records.

Action to Take:

- Read the full publication [here](#).

Update

Summary

Action for firms

EEA Forced Labour Regulation and UK financial firms... how it can apply?

Applies to:
All firms

The EU's new **Forced Labour Regulation (FLR)** entered into force on **13 December 2024**, targeting goods made with forced labour across the entire supply chain. While it **primarily applies to physical goods** placed on or exported from the EU market, insurance intermediaries **are not entirely out of scope**. For brokers, MGAs, and intermediaries with **operations, clients, or group connections in the EEA**, the regulation introduces indirect but important compliance and reputational risks.

Financial Services Firms/Intermediaries are not themselves placing goods on the EU market. Therefore, the regulation **doesn't directly apply** to them in the way it does to manufacturers or retailers.

However, firms should be alert to the **following exposures**:

◆ Group Compliance

If you're part of a wider group with EEA-regulated entities, expect **group-wide due diligence standards** to flow down—covering procurement, outsourcing, and internal supply chains.

◆ Client Expectations

Your clients—especially in manufacturing, logistics, or retail—may require brokers to demonstrate ESG alignment, including **forced labour safeguards** in procurement and risk advisory processes.

◆ Product Governance and ESG

Firms offering investment-based insurance products or working closely with insurers on ESG-integrated strategies may be asked to **show alignment with EU sustainability and human rights frameworks**, including the FLR.

◆ Reputational Risk

Even if you're not regulated under the FLR, being linked to a value chain associated with forced labour could trigger client loss, public scrutiny, or internal investigation—especially for firms operating across borders.

Action to Take:

While the regulation doesn't directly apply to you, it would be risky to ignore it. Here's how you can stay ahead:

- **Review your group structure and EEA connections**
Identify if any entity in your group is subject to FLR or indirectly exposed via procurement or outsourcing.
- **Map your clients and exposure sectors**
Flag clients in manufacturing, commodities, and global supply chains—these are high-risk industries where FLR compliance may be expected of partners, including insurers and brokers.
- **Engage in training and communication**
Ensure client-facing teams understand how forced labour regulation intersects with insurance distribution and product governance.

Update

Summary

Action for firms

ICO anonymisation guide

Applies to:
All firms

The UK's Information Commissioner's Office (ICO) has released comprehensive guidance on **anonymisation**, providing organizations with essential insights into effectively transforming personal data into anonymous information.

Key Highlights from the ICO's Anonymisation Guidance

- **Definition of Anonymisation:** The ICO clarifies that anonymisation involves converting personal data into a form where individuals are no longer identifiable. This process ensures that data protection laws no longer apply to the information.
- **Distinction Between Anonymisation and Pseudonymisation:** It's crucial to differentiate between these two processes. While anonymisation results in data that doesn't identify individuals, pseudonymisation merely reduces the identifiability of data subjects but still falls under data protection regulations.
- **Effective Anonymisation Techniques:** The guidance emphasizes the importance of assessing the risk of re-identification and implementing robust techniques to mitigate such risks. Organizations are encouraged to evaluate factors like the data environment, potential intruders, and the means reasonably likely to be used for identification.
- **Benefits of Anonymisation:** Properly anonymised data can be shared and processed without infringing on individuals' privacy rights, facilitating data-driven innovation and research while ensuring compliance with data protection laws.

Action to Take:

Review the [ICO guide](#) and internal processes.

Update

Summary

Action for firms

ICO annual Data Protection Conference.

Firms of all sizes should register and attend - [here](#).

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Action to Take:

Review the [ICO guide](#) and internal processes.



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