Weekly Regulatory Briefing

16 November 2026

FCA & WIDER UK REGULATION

Consequential developments. Practical implications.
Clear actions for your firm.

Review window: 26 October–16 November 2026
Catch-up coverage from the latest verified prior edition.

In this edition

Operational resilience and fair value • Insurance conflicts and permissions • Fraud, clones and digital promotions • Motor-finance settlements • Sanctions and AI evidence • Credit, FOS and pension proposals.

Coverage qualification: verified developments are included. The FCA news inventory could not be certified complete because pagination returned stale results. The report and companion log identify the remaining gaps.

We’re here if you need support.

Practical compliance advice from our offices in London and Brussels, with online training through RegZone.io.

01 UK EMIR: prepare intragroup exemptions for January

Publication: 03 November 2026
Status: Final Rule
Applies to: Insurers and reinsurers, and other group entities, entering derivatives subject to UK EMIR.

WHAT HAPPENED

PS26/21 finalises technical standards supporting the permanent intragroup exemption regime from 1 January 2027. Existing clearing and margin exemptions, including TIGER exemptions, continue only where the relevant conditions hold.

For new exemptions needed before January, the FCA strongly encourages notification before 5 December 2026. Firms planning submissions between 5 and 31 December should contact it. January notifications use the new Connect process.

ACTION FOR FIRMS

RRCA can help treasury and compliance distinguish existing exemptions from new applications, document conditions and assign transition ownership. Ordinary insurance distribution does not itself bring a firm within UK EMIR.

- Inventory intragroup derivatives and evidence the conditions supporting each exemption.
- Submit any needed pre-January notification before 5 December, or agree timing with the FCA.
- Update treasury procedures and Connect access for the January notification process.

SOURCES

Primary source: UK EMIR: prepare intragroup exemptions for January

02 Insurance permissions: reporting failures have consequences

Publication: 04 November 2026
Status: Enforcement
Applies to: Insurance brokers, MGAs with relevant permissions, principal firms and consumer-credit businesses.

WHAT HAPPENED

The FCA cancelled Adelphi Special Risks Limited's permission on 4 November 2026 after missing returns and failures to answer information requests. Its final notice identifies insurance and consumer-credit reporting failures.

Cyber Quote Limited's final notice and Archer Insurance Services Limited's Notice of Decision also date from 4 November. The cases demonstrate that dormant activity, unpaid fees and unattended regulatory correspondence need active management; the specific grounds differ between firms.

Related credit cases reinforce the same controls: Hebden Supply's cancellation on 27 October followed missing returns; Social Motor Finance's cancellation took effect on 27 October after inactivity and outstanding obligations; Leader Autos' notice dated 28 October concerns unpaid fees and levies.

ACTION FOR FIRMS

This is enforcement of existing requirements, not a new reporting regime. RRCA follow-up should connect returns, fees, attestations and regulator correspondence to named owners and escalation. Principals should examine whether AR data delays undermine their own submissions.

- Reconcile the regulatory return calendar against submitted receipts and outstanding queries.
- Test monitoring of FCA inboxes, portal tasks, fees and firm-details attestations.
- Check counterparty permissions before placements or referrals and plan orderly cancellation for dormant permissions.

SOURCES

Primary source: Insurance permissions: reporting failures have consequences

Cyber Quote: final notice

Archer: Notice of Decision

Hebden Supply: final notice

Social Motor Finance: Notice of Decision

Leader Autos: final notice

03 Fake takeover: forged evidence and invented identities

Publication: 10 November 2026
Status: Enforcement
Applies to: All sectors: especially AR onboarding, credit merchants, delegated authorities, acquisitions and claims verification.

WHAT HAPPENED

Christopher Woolcott received a two-year prison sentence, suspended for two years, and 200 hours of unpaid work over a fabricated £154 million takeover bid for Touchstone Exploration. The FCA describes invented identities and AI-assisted forged documents.

The case concerns criminal conduct rather than a new compliance rule. Touchstone was not under investigation. Its relevance extends beyond listed markets: plausible documents and apparently credible contacts did not establish genuine authority or funding.

ACTION FOR FIRMS

RRCA can use the case in financial-crime CPD and test whether KYB, acquisition and delegated-authority files contain independently verified evidence. AI detection software alone is not a substitute for authenticating the underlying facts.

- Verify controllers, signatories and funding through independently sourced contact channels.
- Escalate inconsistencies across identities, domains, documents and transaction narratives.
- Use the case in scenario training for onboarding, claims and senior-management approvals.

SOURCES

Primary source: Fake takeover: forged evidence and invented identities

04 Insurance clones: an FRN is not proof of identity

Publication: 13 November 2026
Status: Enforcement
Applies to: Insurance brokers, MGAs, insurers, principal networks and digital credit distributors.

WHAT HAPPENED

The FCA warned on 13 November about CheapCuva, which copied Cuvva Limited's details, and on 12 November about Car Insur. The genuine authorised businesses are not connected with the clones.

The warnings illustrate how a real firm reference number can be combined with false websites or social-media contacts. They do not establish misconduct by the genuine firms or impose a new rule.

ACTION FOR FIRMS

Brand protection and onboarding controls should connect regulatory status with the actual person, domain and payment destination. RRCA can help principals test AR trading names and digital journeys and assess the response to impersonation reports.

- Match domains and contact details against independently accessed FCA records.
- Monitor impersonating advertisements and social accounts using the firm's trading names.
- Provide customers with a clear route to verify communications and report suspected clones.

SOURCES

Primary source: Insurance clones: an FRN is not proof of identity

Car Insur: FCA warning

05 Ethica: debt demands require enforceability checks

Publication: 05 November 2026
Status: Enforcement
Applies to: Debt collectors and servicers, consumer-credit lenders and principal networks; analogous controls for delegated recoveries.

WHAT HAPPENED

The FCA secured restrictions concerning Ethica Resolve's collection of disputed disguised-remuneration loans for West 28th Street. Consumers must be told that payment is not enforceable at this stage; further demands in the proposed claim and default judgments are constrained while issues are resolved.

The court has not resolved enforceability. Vulnerable consumers require particular attention. This does not mean borrowers can ignore court correspondence.

ACTION FOR FIRMS

The read-across for DPC/BNPL and insurance recoveries is evidential: an instruction from a creditor or outsourcing partner does not remove the need to establish authority, legal basis, disputed status and fair treatment. RRCA can review recovery scripts and escalation controls.

- Sample disputed debt files for the agreement, assignment and enforceability evidence.
- Prevent automated demands or escalation where the debt status is unresolved.
- Ensure vulnerability and court-correspondence safeguards reach outsourced collectors.

SOURCES

Primary source: Ethica: debt demands require enforceability checks

06 HTX undertakings: promotions across digital channels

Publication: 29 October 2026
Status: Enforcement
Applies to: Principal networks, insurance and credit distributors using affiliates, websites, apps or social media; direct order concerns Huobi Global S.A.

WHAT HAPPENED

A Tomlin Order dated 27 October, published by the FCA on 29 October, records Huobi Global S.A.'s undertakings not knowingly to communicate unlawful financial promotions, including through websites, apps and social media.

The undertakings run to 21 October 2031. The settlement terms are confidential. This is a consent order, not a finding of every alleged fact or a new general financial-promotion rule.

ACTION FOR FIRMS

The transferable lesson is channel ownership: delegated marketing does not eliminate the need to know who controls content and whether it is lawfully communicated. RRCA can review approval trails and affiliate change controls without importing crypto-specific requirements into insurance.

- Inventory websites, apps, affiliates and social accounts used to promote regulated products.
- Verify the legal basis, owner and approval record for each promotional route.
- Test prompt withdrawal of non-compliant content across outsourced channels.

SOURCES

Primary source: HTX undertakings: promotions across digital channels

07 Operational resilience: evidence capability now

Publication: 11 November 2026
Status: Supervisory Finding
Applies to: Firms within SYSC 15A, including relevant insurers and larger intermediaries; supplier read-across for MGAs, TPAs, principals and credit firms.

WHAT HAPPENED

The FCA's cross-sector review distinguishes demonstrated resilience from plans to improve it. Strong evidence links impact tolerances, severe scenarios, dependencies, vulnerabilities, validated remediation and board challenge.

The same-day trading-venue review reinforces incident escalation, assurance and third-party resilience lessons. These are supervisory findings, not new rules. Sector-specific requirements must be mapped before applying them to a smaller intermediary or credit firm.

ACTION FOR FIRMS

Test the actual ability to continue claims payments, customer support and credit servicing during disruption, including delegated providers. RRCA can translate findings into a board evidence pack and a risk-based testing programme.

- Run a severe supplier or cyber scenario through claims and servicing dependencies.
- Retest completed remediation and record remaining gaps against tolerances.
- Give the board evidence of current capability, vulnerable-customer impacts and accountable remediation owners.

SOURCES

Primary source: Operational resilience: evidence capability now

Trading venues: related supervisory review

PS26/2: incident and third-party reporting

Osborne Clarke analysis, 11 November 2026

08 Consumer-credit fair value: test real customer outcomes

Publication: 29 October 2026
Status: Supervisory Finding
Applies to: Consumer-credit and DPC firms within the Duty; insurance premium finance, distributors, principals and delegated service providers by read-across.

WHAT HAPPENED

The FCA's consumer-finance review challenges assessments that rely on cost justification or market comparisons without testing customer benefits and total charges. Repeated fees, customer segments and actual outcomes matter.

The findings cover lending and ancillary credit services. Insurance firms should apply the transferable approach to remuneration, premium finance, administration charges and claims friction alongside their own applicable PROD and ICOBS obligations. No new rule is created.

ACTION FOR FIRMS

RRCA can connect value assessments to complaints, arrears, cancellations and vulnerable-customer evidence. A satisfactory portfolio average can conceal poor outcomes for a particular group or distribution route.

- Recalculate total customer cost, including repeat fees and linked premium-finance charges.
- Segment value MI by product, channel, vulnerability and repeated use.
- Document corrective action where actual benefits or outcomes do not support the price.

SOURCES

Primary source: Consumer-credit fair value: test real customer outcomes

09 Wholesale findings: data gaps can disable controls

Publication: 02 November 2026
Status: Supervisory Finding
Applies to: All RRCA sectors by controls read-across; direct findings concern wholesale banks and other wholesale market participants.

WHAT HAPPENED

The FCA identifies missing data in financial-crime controls, surveillance configuration errors and poor escalation of combined client-risk signals. It also describes AI-generated code errors missed by human review and weak records of conditional approvals.

These findings support cross-sector testing of whether alerts receive complete input data and reach decision makers. Banking trading obligations do not automatically apply to insurance brokers or credit firms.

ACTION FOR FIRMS

For principal firms and delegated authorities, the question is whether risk information from complaints, onboarding, claims and monitoring is joined up. RRCA can test control operation rather than relying on policy descriptions or vendor assurances.

- Reconcile source records to screening and monitoring inputs after system changes.
- Test whether several weak signals together trigger counterparty or AR escalation.
- Audit AI approvals, production exceptions and evidence of effective human challenge.

SOURCES

Primary source: Wholesale findings: data gaps can disable controls

10 Motor finance: settlement offers and mixed complaints

Publication: 03 November 2026
Status: Guidance
Applies to: Motor-finance lenders and brokers, principal networks and firms handling linked GAP complaints; not all BNPL lending.

WHAT HAPPENED

The FCA sets minimum expectations for early full-and-final settlement offers during the partial complaints suspension. Offers should meet the applicable maximum individual scheme redress calculation and give customers at least one month to decide.

Mixed complaints require separate handling: GAP or affordability issues are not automatically swallowed by the motor-commission scheme. Communications must explain settlement consequences, the legal challenge and relevant FOS restrictions. The 12 November page change added Welsh FAQs.

ACTION FOR FIRMS

RRCA can review offer calculations and letters, separating scheme and non-scheme complaints and testing customer understanding. The challenge hearing is listed for 16 February–3 March 2027; it does not justify abandoning preparation.

- Independently test settlement calculations against the applicable scheme methodology.
- Separate GAP and affordability allegations from commission-scheme complaint elements.
- Check letters explain acceptance consequences and allow at least one month for response.

SOURCES

Primary source: Motor finance: settlement offers and mixed complaints

FCA settlement announcement

11 ESG ratings: final regime, future commencement

Publication: 03 November 2026
Status: Final Rule
Applies to: Firms providing ESG ratings within the UK perimeter; insurers, reinsurers and credit firms using ratings by supplier/governance read-across.

WHAT HAPPENED

PS26/22 finalises the ESG ratings regime. From 29 June 2028, in-scope providers need FCA authorisation and the relevant permission unless an exclusion applies. The authorisation gateway opens on 24 June 2027, with staggered application windows.

A firm does not become a rating provider merely by buying or using a rating. Users should nevertheless examine transparency, independence and the reliability of ratings supporting investment, lending or product claims.

ACTION FOR FIRMS

RRCA can help distinguish rating production from internal use and assess vendor dependence. Implementation planning should use the final perimeter and provider-specific application window, not assume authorisation is required immediately.

- Map whether the firm produces, distributes or only uses ESG ratings.
- Identify exclusions and the relevant authorisation window for any in-scope activity.
- Challenge rating-provider methodology, conflicts and limitations in investment or credit decisions.

SOURCES

Primary source: ESG ratings: final regime, future commencement

12 Insurance conflicts: leaseholders remain in the assessment

Publication: 06 November 2026
Status: Commentary
Applies to: Buildings insurers, brokers, MGAs, Lloyd’s firms and claims handlers; particularly freeholder or managing-agent ownership links.

WHAT HAPPENED

In its Annual Public Meeting responses, the FCA says its focused multi-occupancy buildings insurance review is expected to conclude in early 2027. It reiterates that ownership, commercial relationships and remuneration can create conflicts.

Leaseholder interests and fair value remain relevant despite reinsurance arrangements. High deductibles must be assessed for their practical effect on leaseholders and disclosed as required. This is commentary on existing obligations, not a new cap or ban on commissions.

ACTION FOR FIRMS

RRCA can review remuneration and placement incentives alongside the policyholder and leaseholder outcomes. A connected broker or captive is not automatically unlawful; the actual arrangement, applicable rules and mitigations require evidence.

- Map ownership and remuneration links across broker, freeholder, managing agent and insurer.
- Test whether excesses make otherwise covered claims impractical for leaseholders.
- Evidence placement challenge, disclosures and remediation where leaseholder value is poor.

SOURCES

Primary source: Insurance conflicts: leaseholders remain in the assessment

13 OFSI: overseas business and UK sanctions exposure

Publication: 12 November 2026
Status: Guidance
Applies to: Insurers, reinsurers, Lloyd's firms, brokers, MGAs and claims/payment handlers with cross-border flows; credit counterparties where UK sanctions apply.

WHAT HAPPENED

OFSI added an overseas-business factsheet to its guidance collection. It explains the UK-person and UK-territory connections, beneficial-owner screening, transaction purpose, ongoing monitoring and licensing.

UK, EU and US regimes are distinct. Firms should establish the actual UK nexus rather than assume every overseas group company is directly subject to identical requirements. The factsheet explains existing law; it does not create a new sanctions regime.

ACTION FOR FIRMS

RRCA can help map premium, claims and recovery flows and identify where ownership/control or payment-routing changes require renewed assessment. Screening names alone does not resolve the full sanctions analysis.

- Map the UK nexus and sanctions responsibilities for each cross-border payment route.
- Check ownership and control as well as names before premiums or claims are paid.
- Record licensing analysis and escalation when counterparties or payment destinations change.

SOURCES

Primary source: OFSI: overseas business and UK sanctions exposure

OFSI collection and update history

14 Court documents and AI: proposed evidence safeguards

Publication: 29 October 2026
Status: Proposal
Applies to: Insurers, professional-indemnity teams, TPAs and delegated litigated-claims handlers; legal representatives and experts in England and Wales.

WHAT HAPPENED

The Civil Justice Council's final report recommends a new Practice Direction and declarations concerning AI's effect on factual witness statements and expert evidence. It distinguishes substantive influence from purely administrative assistance.

These are recommendations for civil procedure, not rules already in force. Legal representatives remain responsible for accuracy. Lewis Silkin's 5 November analysis highlights the practical need to retain records of how evidence was prepared.

ACTION FOR FIRMS

RRCA can help claims and panel-management teams assess evidence provenance, expert instructions and confidentiality controls. Proposed court declarations must not be represented as current universal FCA obligations.

- Ask panel firms and experts how they record substantive AI use in evidence preparation.
- Preserve original evidence and verification records for AI-assisted claims documents.
- Track CPR implementation before changing mandatory court-declaration templates.

SOURCES

Primary source: Court documents and AI: proposed evidence safeguards

Lewis Silkin: original analysis, 5 November

15 Financial Services Bill: credit, FOS and SMCR reforms

Publication: 11 November 2026
Status: Proposal
Applies to: Insurance and consumer-credit firms, principal networks, senior managers and complaints functions.

WHAT HAPPENED

Parliament invited evidence following the Bill's Commons second reading on 10 November. Proposals include Consumer Credit Act reform, changes to FOS decision-making and time limits, and a narrower SMCR.

The committee starts on 24 November and expects to report by 15 December 2026, but may finish earlier and then stop accepting evidence. These are legislative proposals: existing complaints and accountability obligations continue.

ACTION FOR FIRMS

RRCA can help assess how proposed changes would affect agreement documentation, complaint eligibility and accountability. Firms should distinguish policy direction from enacted and commenced requirements.

- Identify practical evidence on credit documentation, complaint handling and SMCR costs.
- Submit any committee evidence promptly rather than treating 15 December as guaranteed.
- Keep current controls in force and track enacted text, commencement and FCA implementation separately.

SOURCES

Primary source: Financial Services Bill: credit, FOS and SMCR reforms

16 Agentic AI: ICO evidence window closes this week

Publication: 08 October 2026
Status: Proposal
Applies to: UK controllers and processors using AI agents, including insurers, claims delegates, brokers and DPC/credit firms.

WHAT HAPPENED

The ICO’s call for evidence on agentic AI closes on 20 November 2026. It considers accountability, lawfulness, fairness, transparency and security as agents act with increasing autonomy.

This older publication is retained solely because the response deadline is imminent. The call is not final guidance and does not itself change data-protection requirements.

ACTION FOR FIRMS

RRCA can help firms describe real claims, onboarding and credit-servicing use cases, including delegated decisions and customer challenge routes. Evidence should distinguish proposed deployments from systems already operating.

- Decide whether to respond before 20 November using specific operational examples.
- Record agent permissions, human intervention points and accountable data owners.
- Check whether customers can obtain explanations and challenge consequential outcomes.

SOURCES

Primary source: Agentic AI: ICO evidence window closes this week

17 Workplace pensions: Guided Retirement proposals

Publication: 03 November 2026
Status: Proposal
Applies to: Life insurers and other operators of contract-based workplace pensions; pension administrators and relevant service providers.

WHAT HAPPENED

DP26/2 is a joint FCA, DWP and TPR discussion on default routes into retirement across contract- and trust-based workplace schemes. The FCA proposes building on the targeted-support framework.

Responses close on 22 December 2026. Draft FCA rules and guidance are expected in the second half of 2027. The discussion does not impose a new current product-design requirement on general insurance or ordinary consumer-credit firms.

ACTION FOR FIRMS

RRCA can help relevant providers assess retirement journeys, governance and customer support, with particular care over the boundary between default solutions, targeted support and advice.

- Map which workplace pension propositions and administration services could be affected.
- Assess default-retirement journey risks and evidence needed for customer outcomes.
- Allocate a response owner and submit relevant feedback by 22 December.

SOURCES

Primary source: Workplace pensions: Guided Retirement proposals

18 Workplace pensions: performance-fee exemption proposed

Publication: 12 November 2026
Status: Proposal
Applies to: Contract-based workplace pension providers, relevant life insurers, IGCs and GAAs; private-asset managers.

WHAT HAPPENED

CP26/40 proposes exempting certain performance fees from the workplace default pension charge cap, supported by transparency and valuation safeguards. It seeks to reflect the existing trust-based approach while adding specified protections.

The consultation closes on 14 January 2027. Final rules are expected in summer 2027. The proposal is not a general relaxation of insurance charges or Consumer Duty value assessments.

ACTION FOR FIRMS

RRCA can support an applicability review and challenge whether private-asset fee terms reward value for savers. Product and governance teams should model outcomes before treating the proposed exemption as available.

- Identify default funds and proposed allocations that use performance fees.
- Test fee structures, valuation challenge and saver-outcome scenarios with governance committees.
- Prepare a response on safeguards and implementation by 14 January 2027.

SOURCES

Primary source: Workplace pensions: performance-fee exemption proposed

19 Unfair terms: complaints and claims must remain accessible

Publication: 06 November 2026
Status: Commentary
Applies to: Retail insurers, brokers, TPAs, credit firms and principal networks.

WHAT HAPPENED

The FCA’s contracts blog describes intervention over unclear travel-insurance delay terms and a financial adviser’s complaint-handling charge. It also discusses fees and cancellation clarity in other retail products.

The lesson is to examine both wording and how it operates: a term can cause harm through uncertainty, friction or cost. This is commentary under existing consumer-protection expectations, not a new DISP rule.

ACTION FOR FIRMS

RRCA can combine contract review with complaints and claims sampling. Insurance and credit firms should test whether a customer can understand the benefit, exercise a right and complain without inappropriate barriers.

- Test exclusions, delay triggers and cancellation terms against actual customer journeys.
- Remove inappropriate complaint fees or process barriers and assess resulting redress.
- Use disputes and claim declines to identify terms needing clarification or remediation.

SOURCES

Primary source: Unfair terms: complaints and claims must remain accessible

20 AI survey: vendor assurance needs ongoing testing

Publication: 26 October 2026
Status: Data Publication
Applies to: Insurers, brokers, MGAs, TPAs, principal networks and credit firms deploying AI.

WHAT HAPPENED

The Bank of England/FCA survey reports AI use by 86% of respondents. Third parties account for 53% of high-materiality AI systems. Pre-deployment controls are more common than ongoing monitoring and review.

These are respondent-reported survey results, not population-wide compliance findings or a new obligation. The publication falls on the prior edition date and is retained in the overlap review.

ACTION FOR FIRMS

RRCA can use the results to challenge whether vendor assurance is supplemented by operational evidence after launch. Claims decisions, customer communications and credit servicing need proportionate monitoring of errors, drift and escalation.

- Reconcile the AI inventory with actual tools used across the firm and delegates.
- Test post-launch accuracy, leakage and customer-outcome monitoring for material systems.
- Require supplier evidence and internal challenge proportionate to the harm a system could cause.

SOURCES

Primary source: AI survey: vendor assurance needs ongoing testing

Consumer Duty review: who is the retail customer?

Status: Existing rules and separate proposals — background requested by the reader.
Applies to: Insurance intermediaries, MGAs, insurers, Lloyd's firms and principal networks; delegated handlers through their role in customer outcomes.

WHAT IS ALREADY IN FORCE

PS25/21 took effect on 9 December 2025. It replaced the old large-risks approach with separate larger-commercial-customer and specialist-risks concepts. A retail customer is not simply an individual: smaller commercial customers can remain protected. Classification requires the applicable definitions and group/linked-enterprise analysis.

The final instrument excludes specified specialist-risk business and general insurance for larger commercial customers from retail market business. Multi-occupancy buildings and retail stakeholders still require careful look-through. Insurance categorisation should not be replaced with an investment-services professional-client test.

WHAT REMAINS A PROPOSAL

CP26/23 proposes changes to non-UK customer scope, distribution-chain reliance and proportionality. Its page expects a policy statement and any new rules in Q1 2027. CP26/22 separately proposes territorial changes to ICOBS/PROD. Neither consultation is a basis to switch off current duties now.

ACTION FOR FIRMS

RRCA can review the classification matrix and evidence supporting exclusions, including main policyholders, retail stakeholders and the location of risks. The scope review should support the new fair-value work in this edition.

- Record the precise current rule and supporting customer facts for each scope exclusion.
- Keep proposed overseas-business changes separate from the live classification process.
- Review training by role: PS25/21 removed the mandatory 15-hour insurance CPD minimum, not competence obligations.

PS25/21: final rules and instrument

CP26/23: Consumer Duty scope and proportionality

CP26/22: insurance simplification proposals

Reporting and identity checks: current requirements

CCR009 — TARGETED CHECK, NOT NEW NOVEMBER RULES

The consumer-credit overview was updated on 9 November 2026, but its change log says “No content change”. CCR009 guidance was last substantively updated on 1 October 2026. Relevant credit broking, debt adjusting, debt counselling and credit-information permissions trigger the return; lender status alone does not determine its scope.

Most relevant firms report annually; firms with at least £5 million annual revenue from credit-related regulated activities report half-yearly. Calendar-year reporting and principal-specific questions matter. The guidance gives 40 business days from the reporting window opening; check each firm’s actual portal schedule rather than inventing a universal due date.

Practical action: reconcile permissions and AR data flows; confirm RegData access and ownership; validate retained CCR002/CCR007 fields rather than deleting those returns wholesale.

Consumer-credit reporting overview
CCR009: scope, principal questions and schedule

COMPANIES HOUSE — INDIVIDUAL DEADLINES MATTER

The identity-verification transition began on 18 November 2025. The approaching anniversary is not a universal deadline for every director and PSC. Directors and PSCs have separate role-specific requirements and windows, including confirmation-statement and birth-month rules. Check each person and company against the official timetable.

Practical action: map director and PSC roles separately; retain evidence of verification and code submission; escalate any overdue filing rather than treating identity verification alone as completion.

Companies House: when verification is required

CYBER TESTING — OPTIONAL SUPPORT

NCSC launched Cyber Adversary Simulation assurance on 11 November 2026 for realistic testing, particularly for critical and larger organisations. This is a supplier-assurance option, not a new universal FCA testing mandate.

NCSC: Cyber Adversary Simulation scheme

Deadline / action tracker

20 November 2026

ICO agentic-AI evidence closes. Older item retained for imminent deadline. Source

Before 5 December 2026

FCA's encouraged submission timing for new pre-January EMIR exemptions; processing advice, not a statutory cutoff. Source

Promptly; committee begins 24 November 2026

Financial Services Bill evidence: expected report by 15 December, but evidence may close earlier. Source

22 December 2026

Guided Retirement responses close. Source

1 January 2027

New UK EMIR intragroup regime and notification process take effect. Source

14 January 2027

Workplace pension performance-fee consultation closes. Source

18 March 2027

PS26/2 incident/third-party reporting rules commence. Historical rulemaking; relevant to current resilience planning. Source

24 June 2027 / 29 June 2028

ESG ratings gateway opens / regime commences; provider-specific application windows apply. Source

Issues to watch next

Consumer Duty and insurance scope

Track the Q1 2027 outcome of CP26/23 and the separate insurance proposals. Continue using live scope tests until changes are made. Source

Motor-finance litigation and mixed complaints

Follow the 16 February–3 March 2027 hearing and any changes to the suspension; maintain separate handling of non-scheme allegations. Source

Buildings-insurance conflicts

Watch the FCA's focused review, expected to conclude in early 2027, and preserve evidence of leaseholder value and remuneration challenge. Source

Financial Services Bill and accountability

Track parliamentary amendments and later commencement/FCA rules; proposed FOS and SMCR reforms do not displace current obligations. Source

Evidence integrity and AI

Monitor implementation of CJC recommendations and ICO findings, with attention to experts, claims evidence and autonomous customer decisions. Source

Highlights: FCA and wider UK regulatory updates cover resilience, fair value, insurance conflicts, financial crime, motor-finance complaints and AI governance, with practical implications for insurance, delegated-authority, principal-network and consumer-credit firms.

Practical support for your firm

RRCA can help assess applicability, update policies, support governance and implementation, and train staff through RegZone. Contact contact@rrcompliance.com or visit rrcompliance.com.

Coverage and reconciliation

The coverage gate is qualified, not passed as exhaustive.

The latest verified prior PDF is 26 October 2026. This edition includes that date to catch publications after its verification cutoff. The separate reconciliation CSV records recovered FCA titles, dates, decisions and sources. Stale news pagination prevents certification of a complete inventory; unverified candidates are expressly logged.

PRIOR COVERAGE ACTUALLY CHECKED

The corrected 19 October edition includes the CFD Consumer Duty findings, benchmark-governance review, Market Watch 86 and LIBOR/EURIBOR ban reversals. These were not assumed to have been covered: the saved PDF was read. Their transferable lessons remain price/value and communications testing, governance challenge, effective monitoring and fair handling of enforcement outcomes. They are not repeated as new November developments.

SOURCE LIMITATIONS

• FCA publication pages reached the 27 October boundary; news results jumped from 6 November to October. Some warning details, transcripts, FOI data and supporting documents remain unverified. The main log names them individually.

• PRA policy and Bank sources were checked; the PRA publications index failed. The legislation new-items feed returned an unsupported-content error. This is targeted UK coverage, not a complete legislative inventory.

• FOS, ICO, OFSI, Companies House and NCSC routes were checked. Lloyd’s public bulletin page exposed no entries; member-only material was not accessed. Its 4 November structural announcement changes oversight organisation, not evidenced firm-level rules.

• Two bounded secondary queries and seven publisher routes were checked. Beale and Dentons were inaccessible; HSF showed older material; DAC/RPC supplied no verified material candidate. Osborne Clarke and Lewis Silkin analysis was followed to primary evidence.

• EEA/EU and other national regimes were not researched. No client records were accessed. This public research file has not been imported, tailored, approved for any client, or sent externally.

Version control: no earlier 16 November PDF or Horizon version was located. This edition is version 1; it does not purport to replace an unknown correction version. The prior dated editions are preserved.