

FCA & WIDER UK REGULATION

Weekly Regulatory Briefing

21 September 2026

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

IN THIS EDITION

Iran sanctions | Companies House prosecutions

FCA AML investigation | Non-financial misconduct

Vulnerability evidence | SME credit policy

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Practical compliance advice from our offices in London and Brussels, with online training through [RegZone.io](https://regzone.io).

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IMMINENT IMPLEMENTATION | 01 / 06

Iran insurance restrictions: final implementation week

Publication: 8 September 2026 (laid); commencement 29 September 2026

Status: Binding legislation; imminent-deadline reminder, not a new change this week

Applies to: Insurers, reinsurers, Lloyd's firms, brokers and MGAs with Iran-linked business; TPAs handling affected claims. Principals should cover relevant AR channels. Credit/DPC firms should assess connected financing and transaction restrictions, not assume that the insurance prohibition itself applies.

WHAT HAPPENED

SI 2026/983 starts on 29 September 2026. New regulation 17C prohibits insurance or reinsurance services to Iran-connected persons, or persons acting for them, where the provider knows or has reasonable cause to suspect the relevant connection. The test is broader than a designated-person name match.

The contractual cut-off is 8 September 2026. The saving permits performance of agreements concluded before that date if lawful when made. Extensions and renewals remain caught unless an obligation to accept them arose before the cut-off, and the saving does not disapply other sanctions.

Connection includes residence, location, incorporation, domicile and specified ownership or control. Exceptions for particular compulsory, third-party, diplomatic, personal-use and chartered-asset insurance are fact-specific. Government notice NTE 2026/18 anticipates Shah Deniz licensing arrangements for 29 September, but firms must check the operative licence and conditions before relying on it.

ACTION FOR FIRMS

RRCA can support a final pre-commencement review across underwriting, renewals, claims and delegated payment authority. Decisions should record the precise statutory connection, exception, saving or licence used.

- Freeze and triage Iran-linked new business, renewals and material extensions that cannot be cleared before 29 September.
- Test ownership, control, location, insured activity and payment routes; do not rely on screening of named parties alone.
- Give coverholders, TPAs and ARs written escalation criteria and require legal approval before any affected claim or premium movement.

Sources: [SI 2026/983](#) | [Iran nuclear sanctions guidance](#) | [NTE 2026/18](#)

ENFORCEMENT & GOVERNANCE | 02 / 06

First Companies House identity-verification prosecutions

Publication: 17 September 2026

Status: Criminal enforcement of existing statutory duties

Applies to: UK company directors and their companies. Practical read-across for insurers, brokers, MGAs, Lloyd's firms, TPAs, principals and ARs, and DPC/credit firms conducting KYB, counterparty or merchant due diligence.

WHAT HAPPENED

The Insolvency Service secured the first convictions for Companies House identity-verification offences. Three directors were fined after two unverified directors continued participating in board decisions and signing or delivering company accounts. Newly appointed directors have had to verify before acting since 18 November 2025.

The case also matters to already-verified directors. One defendant had verified himself but was convicted after failing to take reasonable steps to prevent an unverified fellow director from continuing to act. Existing directors must complete verification during the 12-month transition when filing the company's next confirmation statement.

The fines were modest, but the enforcement signal is consequential: verification is a legal requirement and collective board control matters. A Companies House record is still only one input to regulated firms' KYB. It does not replace checks on beneficial ownership, effective control, authority to bind the business or unexplained changes in directors.

ACTION FOR FIRMS

RRCA should help clients separate their own corporate-filing obligations from the evidence they need when relying on counterparties, ARs, coverholders or merchants. Onboarding and periodic review should capture verification status without treating it as proof of legitimacy.

- Create a director and PSC verification register tied to each group company's next confirmation-statement date and accountable company secretary.
- Block unverified directors from board approvals, regulated decisions and document execution until verification is evidenced.
- Add Companies House verification status and unexplained director changes to higher-risk AR, coverholder, merchant and counterparty reviews.

Sources: [Companies House and Insolvency Service press release](#)

FINANCIAL-CRIME READ-ACROSS | 03 / 06

FCA financial-crime activity sharpens control expectations

Publication: 15–17 September 2026; fake-bid case published 10 September 2026

Status: Active investigation, enforcement, criminal proceedings and speech; no new rule

Applies to: Directly relevant to payment/e-money firms and MLR-regulated businesses; strong read-across for insurers, brokers, MGAs, Lloyd's firms, TPAs, principal/AR networks and DPC/credit firms under SYSC, customer due diligence, safeguarding and governance controls.

WHAT HAPPENED

The FCA opened an investigation into Euro Exchange Securities UK Ltd over possible Money Laundering Regulations offences between 1 February 2020 and 4 June 2026. The stated concerns span the business-wide risk assessment, customers, geographies, services, transactions and delivery channels, plus due diligence, ongoing monitoring, governance, resourcing, record-keeping and escalation. The FCA has reached no conclusion and the allegations are not findings.

In a 17 September speech, the FCA highlighted over-reliance on group controls and insufficient scrutiny of complex lending structures. It also described future AML supervision of legal and accountancy service providers from the back end of 2028. The speech is commentary, not new guidance or a rule.

Two enforcement examples add practical lessons. The FCA banned Nurul Miah, also known as Neil Mia and Neil Miah, after findings that more than £28 million of law-firm client money was taken without permission. Separately, Christopher Woolcott pleaded guilty to fraud and forgery after using multiple false identities and forged documents to support a fake takeover approach. The latter was published before this review period but is included under the expanded financial-crime selection test.

For insurance and credit firms, the combined message is to verify evidence and effective control. Aliases, group reliance, unusual corporate approaches, falsified documents and responsibility gaps should be built into onboarding, monitoring and escalation.

ACTION FOR FIRMS

RRCA can turn these cases into targeted KYB/KYC, AR and delegated-partner testing without treating the EES allegations as proven facts.

- Reperform the business-wide financial-crime risk assessment against customer, geography, product, transaction and delivery-channel data.
- Sample group-reliant and complex-structure files for local challenge, authenticated documents, aliases and independently verified authority.
- Run a forged-document and false-identity scenario through onboarding, payments, claims and AR escalation, recording ownership and response times.

Sources: [EES investigation](#) | [FCA financial-crime speech](#) | [Nurul Miah ban](#) | [Fake takeover prosecution](#)

NON-FINANCIAL MISCONDUCT | 04 / 06

Odey ban upheld: governance cannot be displaced by a powerful founder

Publication: 14 September 2026

Status: Upper Tribunal decision and FCA enforcement action

Applies to: All FCA firms applying FIT, SMCR governance and regulatory-reference controls, including insurers, brokers, MGAs, Lloyd's managing agents, principal firms and authorised credit/DPC firms. AR personnel are not automatically within COCON solely because of this case.

WHAT HAPPENED

The Upper Tribunal upheld the FCA's ban of Crispin Odey and found that he lacked integrity. It also imposed a £1.53 million penalty, reduced from the FCA's proposed £1.83 million. The case followed an internal disciplinary process concerning repeated inappropriate behaviour towards female employees.

The Tribunal upheld findings that Odey bullied and threatened executive directors and twice dismissed the firm's executive committee when it resisted pressure, bringing the disciplinary process to a halt. It also upheld allegations that his dealings with the firm, clients, investors and the FCA lacked candour.

The practical lesson is wider than the underlying conduct. Fitness and propriety can turn on abuse of governance, candour and interference with independent challenge. The decision lands immediately after the FCA's non-financial misconduct framework took effect on 1 September 2026, although the case was decided on its own facts and does not itself create a new rule.

ACTION FOR FIRMS

RRCA should test whether founders, owners and dominant senior managers can remove or neutralise investigators, committees or whistleblowing channels. Investigation governance should remain credible when the subject controls appointments or resources.

- Document who can appoint or dismiss investigation panels, committee members and whistleblowing guardians, with conflict-based recusal triggers.
- Escalate threats, retaliation, lack of candour and interference as separate FIT and Conduct Rules questions, not merely HR issues.
- Test board minutes and regulatory-reference files for evidence that independent challenge survived pressure from owners or senior leaders.

Sources: [FCA: Upper Tribunal upholds Crispin Odey ban](#)

CONSUMER DUTY SUPERVISION | 05 / 06

Consumer vulnerability: policies and training are only the starting point

Publication: 17 September 2026

Status: FCA blog and supervisory commentary; no new rule

Applies to: Directly to payment and e-money firms. Strong Consumer Duty read-across for DPC/BNPL and other credit firms, retail insurers, brokers, MGAs, TPAs and principals responsible for customer support and distribution outcomes.

WHAT HAPPENED

The FCA's review commentary says the best payment firms used management information, complaints, customer feedback and quality assurance to test how people in vulnerable circumstances actually experienced their services. Around half of UK adults show at least one characteristic of vulnerability.

Policies, procedures and training were described as a starting point, not evidence of good outcomes. One provider added callback support after identifying that small-business customers with limited IT literacy struggled to set up and manage accounts. The FCA says proportionate senior-management review can be simple rather than system-heavy.

The FCA frames five questions: whether the firm understands relevant vulnerabilities, identifies and supports customers consistently, can demonstrate outcomes, learns when arrangements fail, and gives the board sufficient information. For insurance and DPC firms, the same test should cover sales, claims, arrears, cancellations, digital journeys and outsourced servicing.

ACTION FOR FIRMS

RRCA can help translate vulnerability policies into outcome testing. The best follow-up is a small evidence pack linking customer needs to journey changes, complaints and quality assurance, with clear senior-management decisions.

- Segment vulnerability indicators by journey stage and compare sales, claims, arrears, cancellation and complaint outcomes.
- Sample whether promised adjustments were delivered consistently by staff, ARs, TPAs and outsourced customer-service providers.
- Put a short exception-led vulnerability dashboard to the board, recording decisions, owners and dates for remedial testing.

Sources: [FCA: payment firms and vulnerable customers](#)

CONSUMER CREDIT POLICY | 06 / 06

SME finance: FCA focuses on verification, CCA reform and open finance

Publication: 17 September 2026

Status: FCA feedback statement and policy direction; no immediate rule change

Applies to: Consumer-credit lenders and brokers serving sole traders or small partnerships, including relevant DPC/BNPL models. Read-across for principals overseeing credit ARs and insurance intermediaries arranging premium finance or other lower-value business credit.

WHAT HAPPENED

FS26/2 finds no evidence that FCA regulation is a major barrier to SME finance, but identifies practical frictions. The review focused on lending of £25,000 or less to sole traders and small partnerships because it falls within the consumer-credit perimeter. Around 60% of SMEs seeking finance in the previous three years sought less than £25,000.

The FCA will focus on digital verification that reduces duplicated customer checks while preserving effective financial-crime controls, proportionate Consumer Credit Act reform, and open-finance use cases including SME lending. These are workstreams, not rule changes or a relaxation of affordability, Consumer Duty or financial-crime requirements.

The statement matters for firms designing business-credit journeys. Efficiency evidence should distinguish genuine duplication from controls needed to establish identity, authority, ownership, purpose and repayment capacity. Principals should also consider whether AR or merchant journeys describe regulated and unregulated business lending accurately.

ACTION FOR FIRMS

RRCA can map the current lower-value SME credit journey and identify controlled simplification opportunities while preserving evidence needed for perimeter, affordability, Duty and financial-crime decisions.

- Tag sole-trader and small-partnership applications by amount, purpose and regulatory status, and test whether perimeter decisions are reproducible.
- Identify duplicated verification steps separately from checks needed for identity, authority, ownership, fraud and affordability.
- Review AR, broker and merchant scripts so regulated protections are not implied for exempt business lending or omitted where they do apply.

Sources: [FCA FS26/2: Supporting SME access to finance](#)

DATES & PRIORITIES

Deadline and action tracker

Verified as at 21 September 2026. Proposed dates are expressly identified; rule commencement, reporting reference dates and submission deadlines are not interchangeable.

DATE	REQUIRED OR PRUDENT ACTION
29 September 2026	New Iran sanctions commence under SI 2026/983 . Review affected contracts now; the insurance contractual cut-off was 8 September 2026.
30 September 2026	PRA PS15/25 liquidity rules commence for in-scope insurers. Taxonomy LQ v2.1.0 operates from 1 October for reference dates on or after 30 September.
30 September 2026	Proposed CP8/26 savings cut-off : all covered risks must have been fully transferred for funded-reinsurance arrangements to qualify. Do not treat this as final grandfathering.
9 October 2026	Consultation closes: CP26/33 on two GI value-measures reporting fields and their transition.
12 October 2026	Consultation closes: CP26/32 , including Lloyd's complaints and the duplicated consumer-credit reporting field.
14 October 2026	Consultation closes: FCA CP26/29 captive regime , where relevant.
31 December 2026 / 1 January 2027	Main PS25/19 amendments commence 31 December; first new collection period is 1 January–30 June 2027. Lloyd's binder changes apply to relevant 2027 inceptions/renewals, subject to territorial conditions.
28 February 2027	2026 GI value-measures data due. Under CP26/33 proposals , the two affected fields would be optional; await final rules before changing submissions.

FORWARD LOOK

Issues to watch next

- Iran implementation: check the final Shah Deniz licence permissions and conditions for 29 September against [NTE 2026/18](#); an announced licence is not an operative permission.
- Lloyd's complaints: monitor [CP26/32](#) and Lloyd's confirmation before signing conditional one-stage binder wording.
- GI reporting reform: track final [CP26/33 rules](#) and the wider consultation expected in the first half of 2027.
- Funded reinsurance: monitor the final treatment of the [CP8/26](#) proposed 30 September savings date; retain evidence supporting transaction timing and full risk transfer.
- Consumer credit reform: watch how the FCA and Treasury translate proportionality and digital verification into CCA proposals, particularly for lower-value SME and DPC journeys.

COVERAGE & QUALIFICATIONS

Review period: developments since the 14 September 2026 edition, checked through the morning of 21 September 2026. The 14 September Odey decision was published after the previous briefing run. The 10 September fake-takeover case is included under the expanded enforcement selection rule.

Primary-source checks covered FCA publications, notices, reporting and news; PRA and Bank publications and reporting; HMT, GOV.UK and legislation; FOS, ICO, OFSI, Companies House, NCSC and Lloyd's/LMA sources. No separate consequential new insurance rule, DPC/BNPL rule, PRA policy, FOS update, ICO enforcement, OFSI action or NCSC advisory was verified for the review period.

Access limitation: the Lloyd's market-bulletin index could not be opened. No inaccessible or unverified bulletin has been relied on. Publicly accessible FCA and LMA sources were checked for the live Lloyd's complaints timetable.

The practical actions are RRCA's suggested compliance follow-up, not additional regulatory requirements. Applicability should be assessed against each firm's permissions, activities and contractual role.

WEBSITE HIGHLIGHT

Highlights: FCA and wider UK regulatory updates cover Iran sanctions, Companies House identity-verification prosecutions, financial-crime controls, non-financial misconduct, vulnerability evidence and SME credit policy, with practical implications for insurers, intermediaries, delegated-authority firms, principal networks and consumer-credit businesses.

We're here if you need support.

RRCA can help assess applicability, update policies, support governance and implementation, and train staff through [RegZone.io](#).

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