

FCA & WIDER UK REGULATION

Weekly Regulatory Briefing

14 September 2026

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

IN THIS EDITION

Iran sanctions | Insurance & Consumer Duty deadlines

PRA liquidity reporting | GI value measures

Lloyd's complaints | Director scams | Resilience

We're here if you need support.

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

contact@rrcompliance.com | rrcompliance.com

NEW LEGISLATION | 01 / 07

Iran sanctions: insurance restrictions start on 29 September

Publication: 8 September 2026 (laid); made 7 September 2026; guidance updated 9 September 2026

Status: Binding legislation made; commencement 29 September 2026

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

WHAT HAPPENED

SI 2026/983 amends the 2019 nuclear and 2023 Iran sanctions regimes. New regulation 17C prohibits insurance or reinsurance services to Iran-connected persons, or those acting for them, where the provider knows or has reasonable cause to suspect the relevant connection. The test extends beyond a match on a designated-person list.

The contractual cut-off is 8 September, not commencement day. Regulation 17C preserves compliance with agreements concluded before 8 September 2026 if lawful when made. Extensions and renewals are included in the prohibition unless an obligation to accept them arose before that date. This is not a blanket exemption from other sanctions.

The statutory connection test includes residence, location, incorporation, domicile and specified ownership/control relationships; it is not simply a nationality test. Exceptions include particular compulsory/third-party and diplomatic insurance. Personal-use and chartered-asset exceptions have narrower conditions and must not be treated as general permission.

The package also restricts financing and services supporting energy, metals, maritime and other controlled activity. Government notice NTE 2026/18 anticipates Shah Deniz trade and financial general-licence arrangements for 29 September. Do not rely on an anticipated licence before checking its operative terms.

ACTION FOR FIRMS

RRCA can support a targeted sanctions impact assessment across underwriting, renewals, claims and delegated payment authority. The immediate task is to identify contracts requiring a legal decision before the new prohibitions commence.

- Inventory Iran-linked agreements by conclusion date and binding extension/renewal obligation; escalate contracts made on or after 8 September.
- Test location, ownership/control, insured activity and payment routes; do not rely solely on sanctions-name screening.
- Record the precise exception or licence supporting each affected payment or service, and communicate restrictions to coverholders, TPAs and ARs.

Sources: [SI 2026/983: regulations 4, 6 and 9](#) | [Iran nuclear sanctions guidance](#) | [NTE 2026/18](#)

DEADLINES THIS WEEK | 02 / 07

Final response window: insurance and Consumer Duty reform

Publication: CP26/22: 26 June 2026; CP26/23: 29 June 2026

Status: Consultation proposals; imminent-deadline reminder, not new rules

Applies to: Insurance manufacturers and distributors, including insurers, brokers, MGAs and Lloyd's firms. Consumer Duty proposals also concern in-scope credit/DPC firms and principals; delegated handlers and ARs are relevant where they influence retail outcomes.

WHAT HAPPENED

Responses close on 18 September 2026 for CP26/23 and 19 September 2026 for CP26/22. These are reminders of the consultations covered last week; the dates were rechecked for this edition.

CP26/22 proposes insurance-rule simplification, including territorial changes to ICOBS and PROD 4, disclosure and digital-delivery changes, and intermediary PII minima expressed in sterling. CP26/23 proposes changes to Consumer Duty scope for non-UK customers and clarifications on proportionality and responsibilities across distribution chains.

Wholesale and international programmes need particular care: policyholder residence, risk location and each entity's distribution role may lead to different results. Firms must continue applying existing rules while the proposals remain under consultation. The FCA expects its Consumer Duty policy statement and new rules in Q1 2027.

ACTION FOR FIRMS

RRCA's immediate follow-up is a short, evidence-led response focused on operational ambiguities and achievable savings. Any future implementation project should preserve wider governance duties and relevant overseas requirements.

- Select multinational policies and delegated chains that expose ambiguity in the proposed territorial tests, and submit worked examples.
- Quantify duplicated disclosures, fair-value information requests and product-review effort that the proposals could remove.
- Approve the CP26/23 response by 18 September and CP26/22 response by 19 September; retain current compliance controls pending final rules.

Sources: [CP26/23: Consumer Duty](#) | [CP26/22: insurance simplification](#)

IMPLEMENTATION REMINDER | 03 / 07

PRA liquidity reporting: confirm readiness for 30 September

Publication: PS15/25: 30 September 2025; taxonomy v2.1.0: 16 December 2025

Status: Final rules; approaching implementation deadline, not a new policy this week

Applies to: A subset of larger UK Solvency II insurers, expected mainly to be life insurers. Not the Society of Lloyd's, managing agents, third-country branches or non-Solvency II firms. No direct reporting duty for brokers, MGAs, TPAs, ARs or credit/DPC firms under this change.

WHAT HAPPENED

Liquidity reporting requirements commence on 30 September 2026. Firm-level scope starts with average assets exceeding £20 billion over the previous three quarterly reporting periods, together with derivatives gross notional value above £10 billion or lending/repo securities exposure above £1 billion. The tests are exposure-based, not a blanket exemption for general insurance.

Reporting covers cashflow mismatches, liquidity market-risk sensitivities and committed facilities, with fund-level requirements and limited ring-fenced-fund exclusions. Firms must be able to support accelerated short-form reporting during stress, not just routine submissions.

The Bank's v2.1.0 liquidity framework is effective from 1 October 2026 for reference dates on or after 30 September 2026. Do not confuse that technical date with rule commencement. Firms outside liquidity-reporting scope are not required to adopt v2.1.0 solely for this change.

ACTION FOR FIRMS

RRCA can coordinate a readiness check with finance, treasury, actuarial teams and reporting vendors. Confirm template-specific remittance obligations separately: 30 September is not a universal submission deadline.

- Document entity and fund scope against the thresholds and exemptions, with finance and risk sign-off.
- Dry-run liquidity templates using reconciled cash, collateral and derivative data; test short-form production under stressed turnaround times.
- Validate the correct XBRL entry points and current validation deny list, and assign owners for submission, exceptions and escalation.

Sources: [PRA PS15/25](#) | [Insurance reporting updates](#) | [Taxonomy v2.1.0 release note](#)

NEW FCA REVIEW & CONSULTATION | 04 / 07

GI value measures: reporting relief proposed, quality concerns remain

Publication: 11 September 2026

Status: FCA post-implementation review findings and consultation proposals

Applies to: Firms reporting GI value measures under SUP 16.27, including relevant insurers, intermediaries and managing agents. MGAs, TPAs and delegated claims handlers may supply underlying data. Principals/ARs have read-across through distribution and fair-value evidence, not an automatic new return.

WHAT HAPPENED

CP26/33 finds that value-measures reporting has improved transparency and supported fair-value assessment, but inconsistent interpretations and product structures impair comparability. This is a reporting-quality signal as well as a proposed reduction in administrative burden.

The FCA proposes deleting two REP019 requirements: the payout threshold above which the largest 2% of claims fall, and the names of the five largest distribution arrangements for each product. The consultation closes on 9 October 2026; these are not yet final amendments to SUP 16.27.

The proposed transition would make those fields optional for 2026 and 2027 data, submitted by 28 February 2027 and 28 February 2028 respectively. They would be removed for 2028 data reported in 2029. The FCA's consultation page anticipates changes taking effect on 31 December 2026, subject to final rules.

Wider reform is expected to be consulted on in the first half of 2027. Removing two fields does not establish that a product offers fair value or remove the need to understand claims outcomes and distribution costs. Product committees should use more granular evidence where aggregate comparisons could mislead.

ACTION FOR FIRMS

RRCA can separate a narrowly scoped reporting-change project from a wider data-quality and fair-value review. Reporting insurers should agree changes with delegated data suppliers rather than simply deleting collection fields.

- Trace REP019 metrics from policy and claims systems through MGA/TPA feeds, documenting definitions and reconciliation exceptions.
- Identify whether either proposed deletion is still needed for internal fair-value MI before changing contracts or data feeds.
- Submit concrete interpretation problems by 9 October and retain a controlled, reversible build until the final instrument is published.

Sources: [FCA CP26/33 announcement](#) | [CP26/33: review and draft rules](#)

NEW DELEGATED-AUTHORITY UPDATE | 05 / 07

Lloyd's binder renewals: new complaints endorsements

Publication: 8 September 2026 (LMA publication)

Status: Market implementation guidance and contractual wording; UK single-stage reform remains proposed

Applies to: Lloyd's managing agents, coverholders/MGAs, Lloyd's brokers and delegated claims administrators/TPAs. Principal firms should cover ARs involved in relevant arrangements. Not a general change for non-Lloyd's insurers or credit/DPC firms.

WHAT HAPPENED

The LMA has published Lloyd's updated binding-authority complaints endorsements for business inception or renewing from 1 January 2027. They address new complaints-data requirements and, where relevant, a move to one-stage handling. Requirements differ by territory and by the coverholder's authority.

For the UK, Singapore and Hong Kong, FCA approval of the proposed change is still pending. New one-stage wording may be prepared for eligible 2027 drafts, but those agreements must not be signed until Lloyd's confirms approval. Updated two-stage wording remains the alternative; this is not evidence that CP26/32 has been finalised.

International business already follows one-stage handling; Australia and New Zealand have agreed a move, while Canada retains two stages. Annual in-force binders generally need not be amended mid-term solely for reporting, but multi-year/continuous arrangements need attention and data must still be available from 1 January.

Separately, FCA PS25/19 confirms the first new complaints-return collection period as 1 January to 30 June 2027. Contract wording, data feeds and customer-facing complaint instructions therefore need coordinated change control.

ACTION FOR FIRMS

RRCA can map renewal wording and complaints-data responsibilities across the delegated chain. Do not use one global endorsement or assume that postponing a contract amendment postpones data collection.

- Build a binder matrix by territory, renewal date, contract duration and complaints authority, assigning the correct endorsement version.
- Gate signature of UK/Singapore/Hong Kong one-stage drafts on Lloyd's confirmation of FCA approval; retain a two-stage fallback.
- Test 2027 complaints-data feeds and final-response templates with coverholders and TPAs before approving renewal documentation.

Sources: [LMA announcement](#) | [Binding Authority Complaints Endorsements bulletin](#) | [FCA CP26/32](#) | [PS25/19: complaints reporting](#)

NEW FINANCIAL-CRIME READ-ACROSS | 06 / 07

Front-director scams: challenge who really controls a business

Publication: 11 September 2026 (guidance update)

Status: Companies House fraud-prevention guidance; no new statutory duty

Applies to: Principal firms onboarding or reviewing corporate ARs; insurers, brokers and MGAs assessing corporate customers or delegated partners; credit/DPC firms onboarding merchants or business counterparties. TPAs should consider corporate payee-control risks where relevant.

WHAT HAPPENED

Companies House has added a warning about recruiters paying individuals to supply identity details and become directors of unknown companies. The scheme can conceal the people running the business while exposing the named director to responsibility for criminal activity.

Warning signs include pressure to sign documents immediately and requests to route funds through the individual's bank account. The guidance does not create new duties, but reinforces why a register entry or identity check alone does not demonstrate effective control or a credible business relationship.

For principal firms, RRCA's read-across is to AR due diligence: nominal directors can obscure who makes decisions, handles customers or controls money. For lenders and insurers, the same issue can affect merchant onboarding, corporate customer checks and delegated-partner assurance.

ACTION FOR FIRMS

RRCA can add this scenario to targeted onboarding and periodic-review testing, proportionate to the relationship's risk and the firm's applicable financial-crime obligations.

- Interview the actual decision-makers in higher-risk AR, merchant or coverholder relationships and compare their account with declared ownership/control.
- Escalate directors unable to explain the business, third-party instructions to sign, or unexplained personal-account payment routes.
- Sample recent corporate onboarding files for evidence resolving who controls funds and operations, rather than identity verification alone.

Sources: [Companies House: being a company director — scam warning](#)

ENFORCEMENT READ-ACROSS | FCA CRIMINAL CASE

Fake takeover bid: guilty pleas for fraud and forgery

10 September 2026 | FCA criminal enforcement

Woolcott pleaded guilty to four fraud and forgery counts after admitting a fictitious takeover approach for Touchstone Exploration Inc using false identities and forged documents. The FCA says he held shares and stood to benefit from a price rise; sentencing will follow.

Read-across: not a new rule, but relevant to counterparty and AR due diligence. Verify unusual corporate claims, source documents and identities through independent channels; escalate inconsistencies and retain the evidence trail.

Source: FCA - Man pleads guilty to fraud and forgery offences relating to fake takeover approach

NEW FCA COMMENTARY | 07 / 07

Resilience: test shared failures, not just your own outage

Publication: 7 September 2026; not covered in the previous edition

Status: FCA exercise findings and discussion; not new rules or regulatory guidance

Applies to: Insurers, brokers, MGAs, Lloyd's firms, TPAs, principals/AR networks and credit/DPC firms reliant on shared infrastructure. Formal resilience rules remain subject to existing scope.

WHAT HAPPENED

The FCA's Defence, Security, and Resilience Lab explored satellite-navigation spoofing, damaged subsea cables and a cyberattack on a cable landing station. Participants were less confident about shared dependencies than their own vulnerabilities.

A backup provider may share infrastructure with the primary service, or lack capacity when many firms fail over together. This discussion is expressly not regulatory guidance or a threat prediction.

RRCA's practical read-across is to test sector-wide disruption to claims payments, renewals, premium collection and credit servicing, including dependencies outside the firm's immediate control.

ACTION FOR FIRMS

RRCA can use the exercise as a focused challenge to existing continuity plans and outsourced-service assurance, without treating it as an expansion of regulatory scope.

- Ask critical providers whether primary and backup services share telecoms routes, cloud regions, identity services or subcontractors.
- Run a multi-firm outage scenario with claims/payment backlogs and simultaneous supplier failover; measure actual recovery capacity.
- Test prolonged customer and AR communications using channels that remain available if the usual platform fails.

Sources: [FCA: Defence, Security, and Resilience Lab](#)

DATES & PRIORITIES

Deadline and action tracker

Verified as at 14 September 2026. Proposed dates are expressly marked; rule commencement, reporting reference dates and submission deadlines are not interchangeable.

DATE	REQUIRED OR PRUDENT ACTION
18 September 2026	Consultation closes: CP26/23 on Consumer Duty scope and proportionality.
19 September 2026	Consultation closes: CP26/22 on insurance-rule simplification.
29 September 2026	New Iran sanctions commence under SI 2026/983 . Review affected contracts now; the insurance contractual cut-off is 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 approval and rollout:** 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.
- **Subject access requests:** the ICO's [11 September Police Scotland statement](#) confirms a live investigation into SAR compliance, including timing. No breach finding has been made. Insurance/credit firms should watch for lessons on retrieving claims, customer and HR records.
- **Funded reinsurance:** monitor the final treatment of the [CP8/26](#) proposed 30 September savings date; retain evidence supporting transaction timing and full risk transfer.

COVERAGE & QUALIFICATIONS

Review period: developments since the 7 September 2026 edition, checked through the morning of 14 September 2026. The FCA's 7 September resilience publication is included because it was not covered previously. Older items are labelled deadline reminders.

Primary-source checks covered FCA publications, notices, reporting and news; PRA/Bank publications and reporting; HMT/GOV.UK and legislation; FOS, ICO, OFSI, Companies House and NCSC. No separate consequential new DPC/BNPL or AR-specific rule change was verified. No additional selected development arose from FOS or NCSC. Routine updates and unrelated market-abuse cases are omitted.

Access limitation: the Lloyd's market-bulletin index could not be opened. The delegated-authority item relies on the publicly accessible LMA announcement and its Lloyd's endorsement bulletin, cross-checked against FCA sources; member-only material was not reviewed. Official statutory and FCA PDFs were used where HTML pages were unavailable.

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, GI reporting reform, Lloyd's complaints, director scams, resilience and approaching deadlines, 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](#).

contact@rrcompliance.com | rrcompliance.com