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Protection Roadshow

Round 2

November - December

Forward financial thinking

REGULATORY EXPERTISE | BUSINESS SUPPORT | FINANCIAL TECHNOLOGY

Learning Objectives

01

Describe the proposal for increased flexibility to CPD requirements for insurance brokers

02

Explain the importance of transparency in commission disclosure in the context of recent developments in other sectors

03

Identify how the FCA is evolving its engagement with firms including changes to regulatory reporting obligations

CP 25/12 - simplifying insurance rules

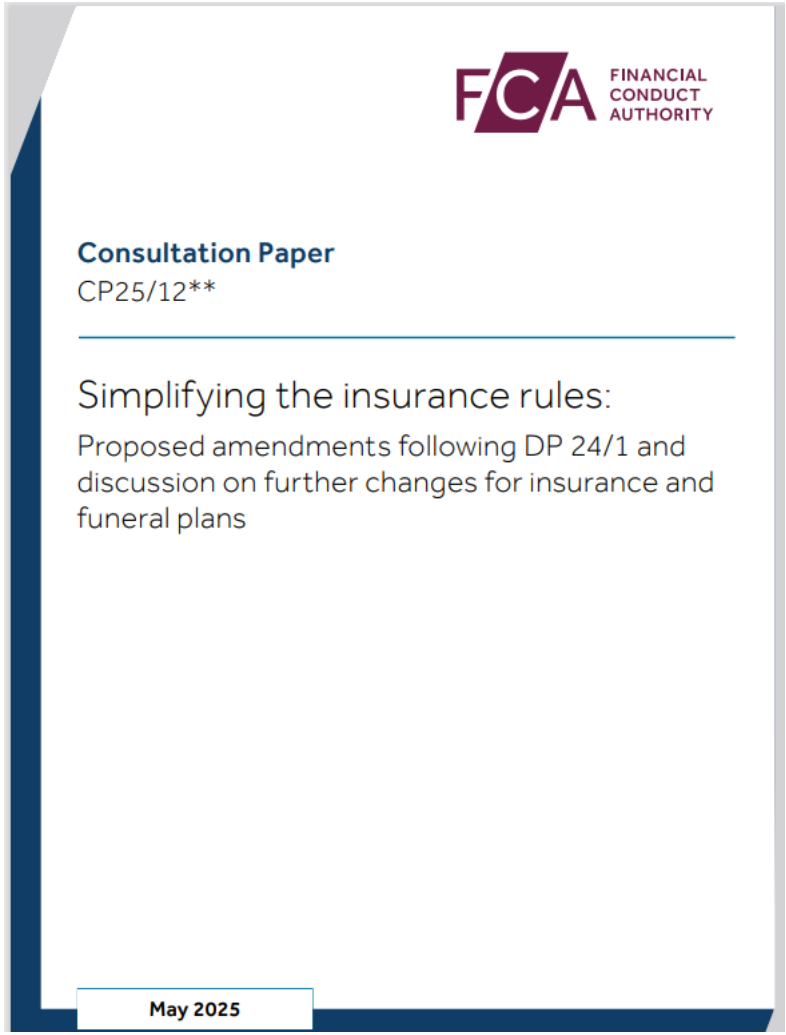
CP25/12 Simplifying the Insurance Rules

Published 14th May

- Product Governance clarifications
- A new definition of commercial insurance
- **Insurance CPD - the 15 Hours requirement**

Consultation ended 2nd July 2025

Large number of responses – we await final rules



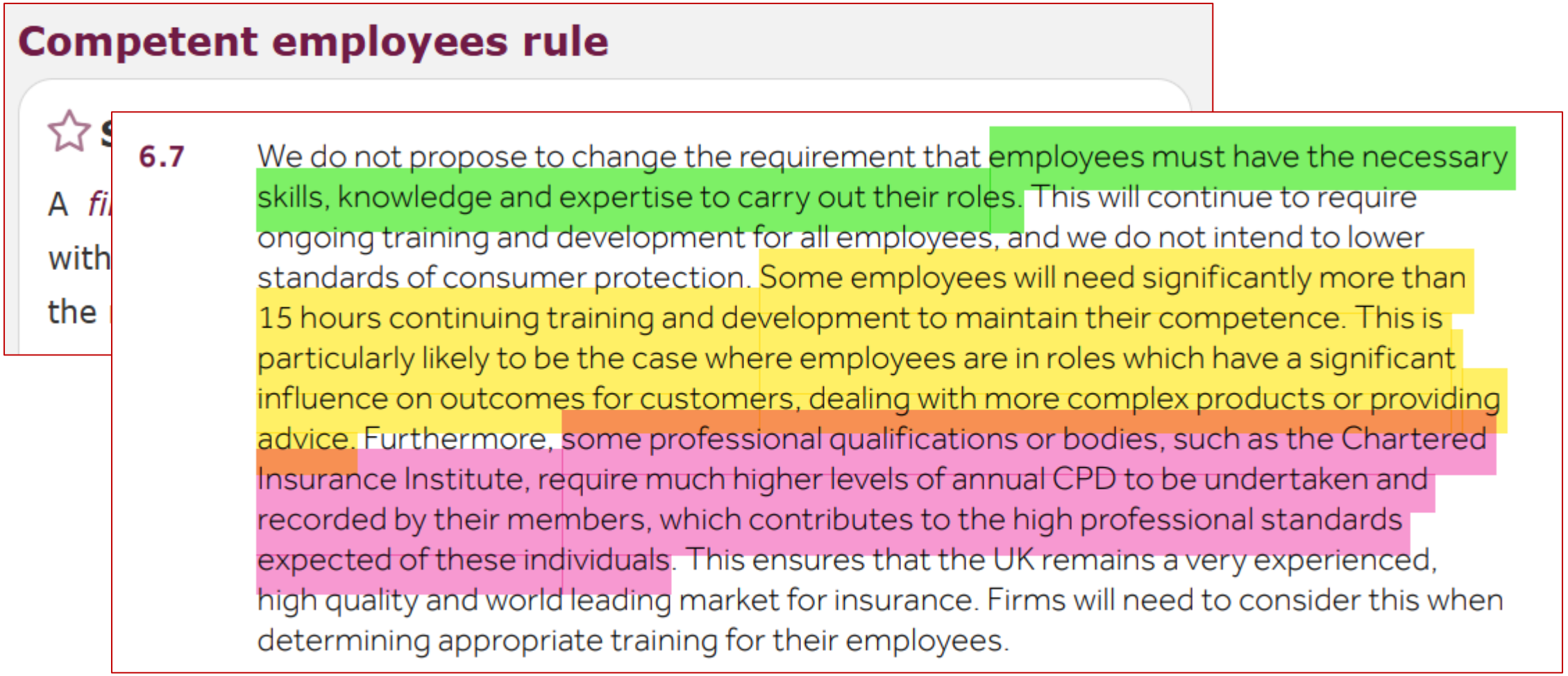
IDD CPD Requirements for Insurance Intermediaries

- The IDD requires everyone selling insurance to record at least 15 CPD hours per year.
- If you already need to do 35 hours of CPD each year for retail investment activities, these 15 hours are included in that requirement.
- The FCA also expects the training to cover specific areas which it refers to as ‘minimum knowledge criteria’.
- Firms are required to monitor and keep records of their employees’ training.

Proposed Changes to CPD Requirements for Insurance Intermediaries

Removal of the “inflexible” 15-hour CPD requirement and associated monitoring and record-keeping.

Careful - do not be misled by press headlines!



Be aware

- These are proposals only, so subject to change.
- The CPD rule removal only relates to non-investment insurance (GI and pure protection)
- The 15-hour requirement is expected to remain for ‘long term insurance’ other than pure protection (e.g. policies with an investment element, endowment policies, long term care insurance contracts, or investment bonds).
- We will confirm final rules when published

SYSC 28.2.2 – Important Knowledge Requirements

- Policy terms, conditions, guaranteed benefits, risks
- Knowledge of applicable laws that govern insurance distribution
- Complaint handling, data protection, AML, vulnerability
- Knowledge of assessing consumer needs
- Conflicts of interest
- Knowledge of the insurance market

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Please download and install the Slido app on all computers you use

How much GI and pure protection CPD would you typically record each year?

ⓘ Start presenting to display the poll results on this slide.

Not a relaxation of competence

- Firms would have to set frameworks
- Tailor the amount of CPD undertaken to role & risk.
- Accountability lies with firms to maintain a T&C plan.
- **File Reviews –** will help identify trends or adviser gaps in knowledge
- General CPD record keeping requirements will remain

Next steps

Policy statement is expected by the end of Q4 2025

Not a guaranteed outcome - await the response

We will keep you informed!

REMEMBER: Staff competency is a key business RISK

Protection Market Study – commission transparency

MS24/1.3 - Structure of the UK Pure Protection Market

MS24/1.3 is part of the FCA's broader Pure Protection Market Study to be followed by an interim report later in 2025.

Set out factual detail about the UK pure protection market:

- product types
- participants,
- distribution customer characteristics
- regulatory developments.

Pure Protection Market Study

Pressure on firms to reduce consumer detriment from high margins or opaque commission structures – Transparency is key

Assess commission / remuneration models for alignment with customer interests – is commission influencing decisions?

Evaluate transparency, disclosures, and product comparability

Commission Disclosure – learnings from other sectors

In the motor finance sector, inadequate disclosure of the following arrangements are under scrutiny:

- a Discretionary Commission Arrangements
- b. high commission arrangement (where the commission is equal to or greater than 35% of the total cost of credit and 10% of the loan)
- c. tied arrangements that gave exclusivity or a first right of refusal

Consumer Duty has raised expectations around commission disclosure. It is essential that you consider fair value, there is transparent disclosure of commission to the client and you carefully disclose any exclusivity arrangements with insurers.

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Please download and install the Slido app on all computers you use

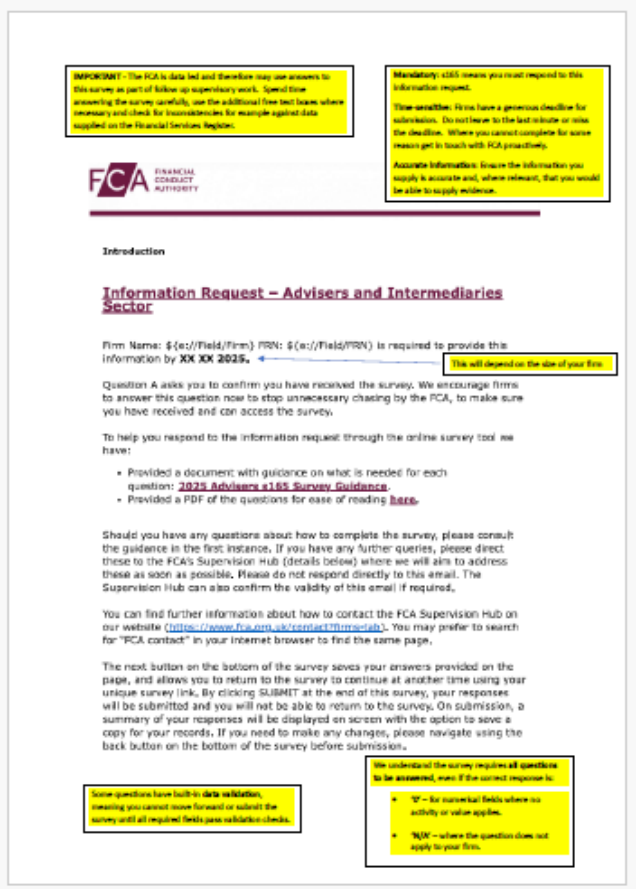
How do you disclose commission to the client?

ⓘ Start presenting to display the poll results on this slide.

Reporting

FCA s165 ‘Information Requests’

- Investment firms received one this summer
- Likely to be the new normal
- Offers more agility to support and to supervise
- In return FCA will (slowly!) decommission less valuable data



IMPORTANT - The FCA is data led and therefore may use answers to this survey as part of follow up supervisory work. Spend time answering the survey carefully, use the additional free text boxes where necessary and check for inconsistencies for example against data supplied on the Financial Services Register.

Mandatory: s165 means you must respond to this information request.

Time-sensitive: Firms have a generous deadline for submission. Do not leave to the last minute or miss the deadline. Where you cannot complete for some reason get in touch with FCA proactively.

Accurate information: Ensure the information you supply is accurate and, where relevant, that you would be able to supply evidence.

FCA FINANCIAL CONDUCT AUTHORITY

Introduction

Information Request – Advisers and Intermediaries Sector

Firm Name: ${e://Field/Firm} FRN: ${e://Field/FRN} is required to provide this information by **XX XX 2025.**

This will depend on the size of your firm

Question A asks you to confirm you have received the survey. We encourage firms to answer this question now to stop unnecessary chasing by the FCA, to make sure you have received and can access the survey.

To help you respond to the information request through the online survey tool we have:

- Provided a document with guidance on what is needed for each question: 2025 Advisers s165 Survey Guidance.
- Provided a PDF of the questions for ease of reading here.

Should you have any questions about how to complete the survey, please consult the guidance in the first instance. If you have any further queries, please direct these to the FCA's Supervision Hub (details below) where we will aim to address these as soon as possible. Please do not respond directly to this email. The Supervision Hub can also confirm the validity of this email if required.

You can find further information about how to contact the FCA Supervision Hub on our website (https://www.fca.org.uk/contact/firms/ask). You may prefer to search for "FCA contact" in your internet browser to find the same page.

The next button on the bottom of the survey saves your answers provided on the page, and allows you to return to the survey to continue at another time using your unique survey link. By clicking SUBMIT at the end of this survey, your responses will be submitted and you will not be able to return to the survey. On submission, a summary of your responses will be displayed on screen with the option to save a copy for your records. If you need to make any changes, please navigate using the back button on the bottom of the survey before submission.

Some questions have built-in data validation, meaning you cannot move forward or submit the survey until all required fields pass validation checks.

We understand the survey requires all questions to be answered, even if the correct response is:

- '0' – for numerical fields where no activity or value applies.
- 'N/A' – where the question does not apply to your firm.

Reduce the reporting burden?

Complaints Return	RMA-H COBS data (ARs only))
~~CCR Complaints Return~~	RMA-I Product Sales Data
RMA-A Balance Sheet	RMA-J Data required for fees
RMA-B Profit and Loss	REP019 – GI Value Measures
RMA-C Client Money and Assets	REP021 – GI Pricing information
RMA-D1 Regulatory Capital	~~REP022 – GI Attestation~~
RMA-E PI insurance	REP008 – Conduct Rules Reporting - **REPORTING FLEXIBILITY!**
~~RMA-F Threshold conditions~~	CCR009 Consumer credit activities – **NEW RETURN FROM 1st JAN**
RMA-G Training and Competence	FIN073 Baseline Resilience – **UP FOR REVIEW?**

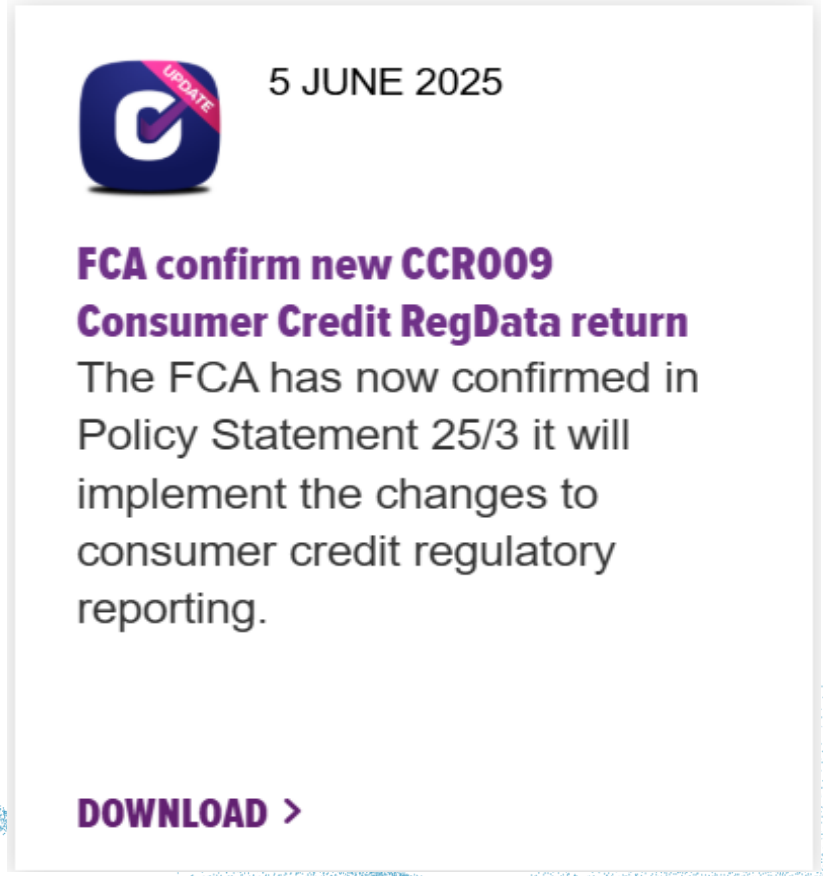
Be aware from 1st January 2026

New Consumer Credit Reporting Return (CCR009)

The new return will collect data from firms with the permission to carry out:

- Credit broking and/or
- Debt counselling

Prepare – familiarise the new return and consider where new data collection may be required



FCA Confirms New Consumer Credit Reporting Return (CCR009)

When is the first CCR009 return due?

- **First return due:** the first CCR009 return will fall due for completion on 1st January 2026
- **Submission deadline:** firms will have 40 business days to complete
- **Reporting period:** the data entered should be based on the reporting period 1st January – 31st December 2025 (the data should be annualised where it is not available for the full period)
- **Reporting Frequency:** Annually (or six monthly if regulated credit revenue exceeds £5m)

IMPORTANT

- The existing **CCR002** return will be partially replaced, with removal in full to be subject to further consultation.
- Contact the Compliance Helpdesk in January if you require support

Support

Support

- SimplyBiz Advice Quality Team
- Protection Team
- Protection Helpdesk
- Co:mentis
- Usay
- Caspian
- Towergate
- SolutionBuilder

Important Documents:

- Protection Advice process
- Checking client understands
- Fair value assessment templates

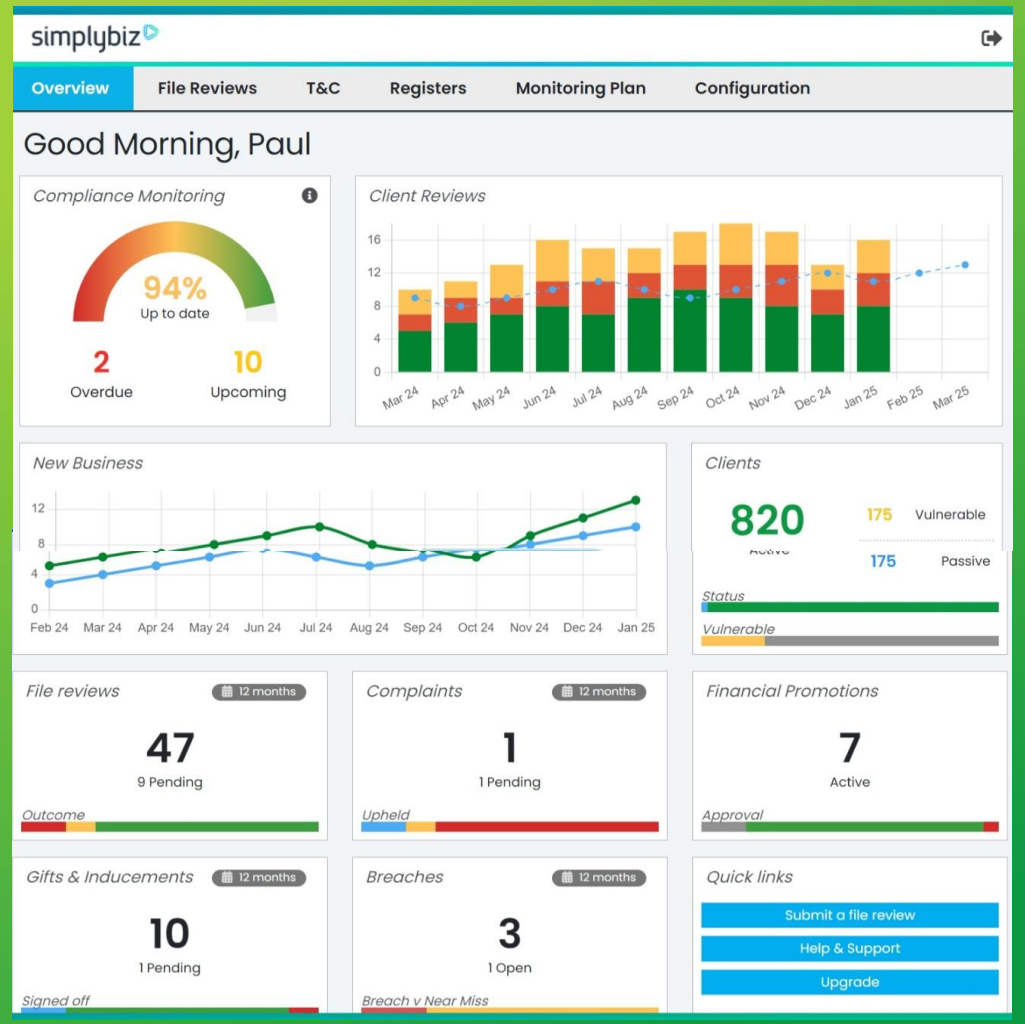
Compliance digitisation

Digitised compliance solution for all included in membership

Compliance Dashboards & Registers

Track activities & key risks – reduce worry

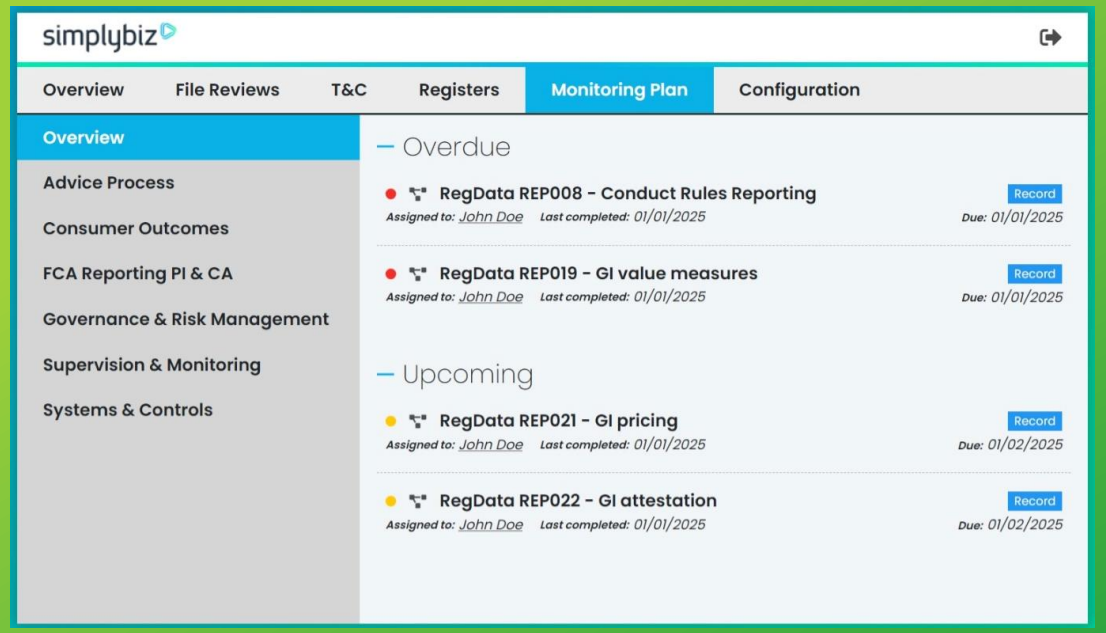
Consumer Duty MI

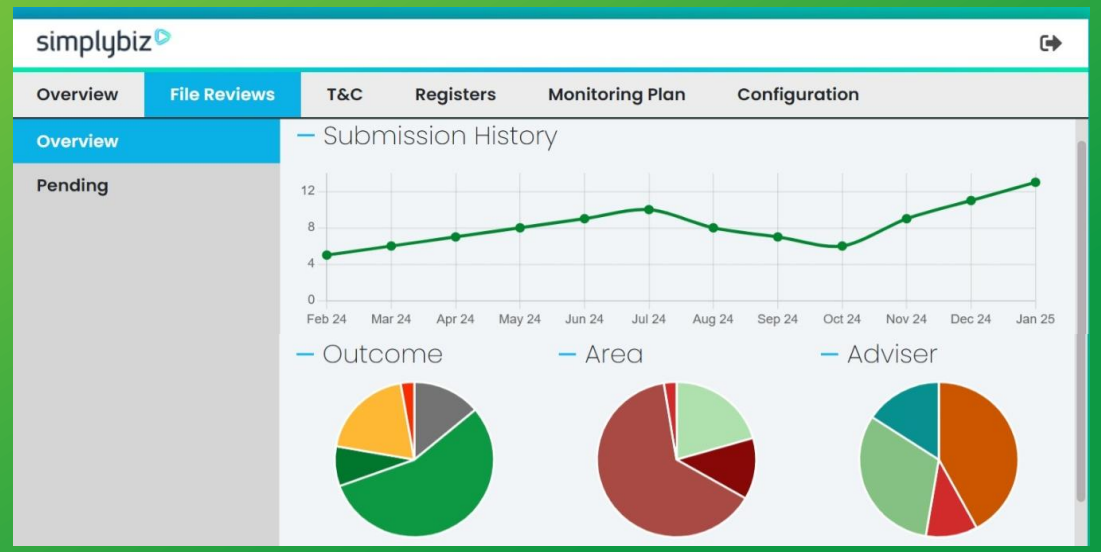


Compliance digitisation

- Compliance Monitoring Plan
- File review outputs
- Vulnerable Person data
- Easy Oversight – all in one place

Staged rollout from April – talk to us about priority access





Learning Outcomes

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