



Protection Roadshow

Compliance update

Spring 2026





Learning objectives

Summarise the key findings from the FCA Protection Market Study



Identify how to strengthen business quality through increased competency standards



Explain the latest Provider expectations when it comes to fact-finding



Protection Market Study - Update





Protection Market Study – Where are we now



Interim findings – What did FCA say?





Market is working well for customers

- Claims acceptance rates are high
- New business premiums remain relatively stable in nominal terms
- FOS complaints are low - 515 upheld out of 13.8m policies in force in 2024
- Intermediaries account for around 80% of sales in 2024
- The majority of sales are advised, and therefore based on individual needs
- Support is available



No significant interventions planned

However, there are some issues that the FCA want to tackle

Churning to generate repeat commission

Encourage firms to offer further support at the point of sale

Monitor Income Protection claims ratios

Monitor for poor outcomes in relation to loaded premiums

Maintain focus on sales quality

Reduce the Protection Gap



Next steps

- Monitor for indicators of unnecessary re-broking
- Consider if doing enough to support clients for when they may need to make a claim, e.g. through trusts, or referral arrangements for Power of Attorney or Wills.
- Actively seek out referral arrangements to support vulnerable customers

Final report due in Q3 2026 – Any planned interventions will follow – We will keep you informed!

Next up - Business quality





CPD – Evidencing competence

Focus on competence

Focus on outcomes, rather than tick box compliance

Tailor CPD to individual

Business quality concerns - set additional expectations

How to Evidence? MI is key.



No lowering of standards

6.7 We do not propose to change the requirement that employees must have the necessary skills, knowledge and expertise to carry out their roles. This will continue to require ongoing training and development for all employees, and we do not intend to lower standards of consumer protection. Some employees will need significantly more than 15 hours continuing training and development to maintain their competence. This is particularly likely to be the case where employees are in roles which have a significant influence on outcomes for customers, dealing with more complex products or providing advice. Furthermore, some professional qualifications or bodies, such as the Chartered Insurance Institute, require much higher levels of annual CPD to be undertaken and recorded by their members, which contributes to the high professional standards expected of these individuals. This ensures that the UK remains a very experienced,



Other ways to show competency



File checks



Performance insights via
KPIs



Provider-led training



Industry engagement and peer
learning/best practice



Data collection forms

- Data collection forms are a research tool
- Majority of providers terms and conditions state that applications questions must be asked as written
- Conducting sales in a foreign language – Provider rules and customer vulnerability

Important!

Application questions must be asked in English

SECTION 1 – CLIENT INFORMATION

Part 1: Initial Contact Details

	First Client	Second Client
Title:		
Name(s):		
Address:		
Postcode:		
Email address:		
Tel No:		
Mobile No:		
Other No:		

Adviser name:		
Introducer details (if applicable):		
Is introducer agreement in place?	Y / N	
Date fact finding commenced:	/	/
Date Fact finding completed:	/	/
Name & relationship of any third-party present		

Regulatory reporting – CCR009





CCR009 Consumer Credit Data

New Annual Regulatory Return

Added to RegData

For firms with:

- Credit Broking permissions; and/or
- Debt counselling permissions.

An ancillary activity for most firms.

Compliance Policy Update

Help guides are available for the new CCR009 Regulatory return

Further to our previous communication in respect of the new CCR009 return. Thank you for your patience, we are pleased to confirm that our help guides to assist you with the new return can be accessed via the links below:

- [Credit broking in relation to General insurance](#)
- [Credit broking in relation to Commercial Mortgages](#)
- [The firm has not conducted any regulated consumer credit activities in the reporting period](#)
- [Full permission credit broker \(does not advise on investments, residential mortgages or insurance\)](#)

The following links provide more information on regulated consumer credit activities in relation to CCR009:

- [Credit broking in relation to General insurance](#)
- [Credit broking in relation to Commercial Mortgages](#)
- [The firm has not conducted any regulated consumer credit activities in the reporting period](#)
- [Full permission credit broker \(does not advise on investments, residential mortgages or insurance\)](#)

The help guides are available in both English and Welsh. If you are unable to access the help guides, please contact us for further assistance.

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CCR009 Consumer Credit Data

Check your RegData schedule

Make sure you have submitted

Deadline is 28th April 2026

Do not leave to last minute – it will
take time to complete

Contact your Compliance support
for guidance

Add to your Compliance Monitoring
Plan

Our support





Your Omni Protect team





Support

Caspian Insurance



SolutionBuilder



Usay Compare





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