User guide: Adding or amending multiple Directory Persons data

This user guide helps firms to either submit new Directory Persons data or amend existing Directory Persons information, in bulk.

From later this year, Directory Persons information will start being published on the Financial Services Register (FS Register), a public register showing details of key people working in financial services.

Directory Persons consist of:

- all Certified staff (those holding a certification function under the Senior Managers and Certification Regime (SM&CR)
- directors who are not performing Senior Manager Functions (SMFs) – both executive and non-executive
- other individuals who are sole traders or ARs (including those within ARs) where they are undertaking business with clients and require a qualification to do so

Directory Persons information to be published on the FS Register includes:

- name and any previous names
- roles with start and end dates
- activities undertaken

For customer-facing roles requiring qualification:

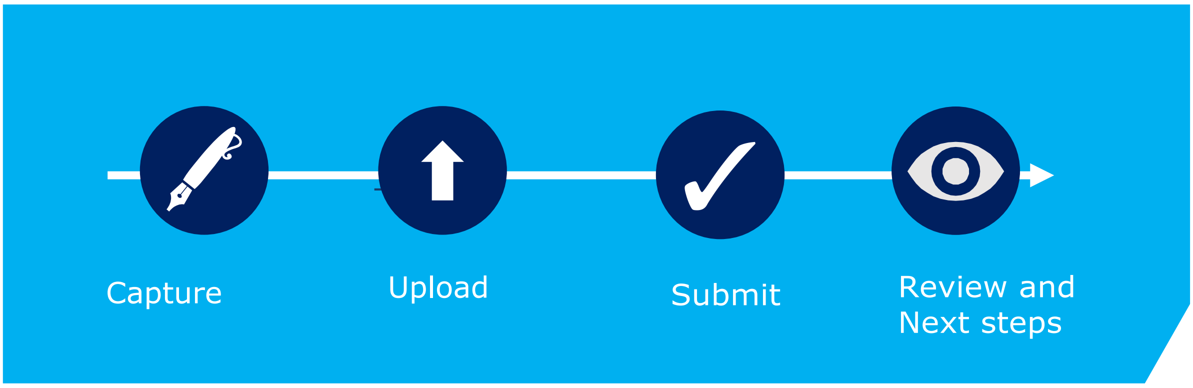
- customer engagement methods
- workplace location (where relevant)
- Memberships of professional bodies

Version: 10.0
February 2021

Table of Contents

1. Getting Started

To submit your Directory Persons data successfully, you need to:



Before you start, check you are ready to begin your submission.

Connect – Make sure you have access to the Connect system. You can't submit Directory Persons data without this.

Spreadsheet – You will need to use a program that allows you to populate an Excel spreadsheet and save the file as CSV UTF-8 format.

Bulk submission of Directory Persons data – use the Multiple Add template to submit new Directory Persons data. This could be new Directory Persons, or new data about those persons, e.g. adding a new role. It cannot be used to amend previously submitted information.

Bulk amendments of Directory Persons data – use the Multiple Amend template to amend previously submitted Directory Persons information.

Latest files - please ensure you are using the latest versions of the user guide and template from the Directory Persons web page.

2. NEW...Roles, Activities and Accreditations

See FCA Handbook for more details on certification functions and list of Activities

Roles covered in Directory
[FCA CF] (1) CASS oversight function
[FCA CF] (2) Benchmark submission and administration
[FCA CF] (3) Proprietary trader
[FCA CF] (4) Significant management
[FCA CF] (5) Functions requiring qualifications
[FCA CF] (6) Manager of certification employee
[FCA CF] (7) Material risk taker
[FCA CF] (8) Client dealing
[FCA CF] (9) Algorithmic trading
[PRA CF] Significant risk taker or Material risk taker
[PRA CF] Key function holder
[PRA CF] Managing a material risk taker
Director of firm who is not a certification employee or a SMF manager
Sole trader dealing with clients for which they require qualification
Appointed representative dealing with clients for which they require qualification

Activities covered in Directory
2. Giving personal recommendations on securities which are not stakeholder pension schemes or personal pension schemes or broker funds
3. Giving personal recommendations on derivatives
4. Giving personal recommendations on retail investment products which are not broker funds
6. Giving personal recommendations on Friendly Society tax-exempt policies (other than Holloway sickness policies where the Holloway policy special application conditions are met)
7. Giving personal recommendations on long-term care insurance contracts
8. Giving personal recommendations on investments in the course of corporate finance business
9. Advising on syndicate participation at Lloyd's
9A. Advising on P2P agreements
10. Broker fund adviser
11. Pension transfer specialist
12. Giving personal recommendations on and dealing in securities which are not stakeholder pension schemes or personal pension schemes or broker funds
13. Giving personal recommendations on and dealing with derivatives
14. Managing investments
15. Operating a collective investment scheme or undertaking the activities of a trustee or depositary of a collective investment scheme
16. Safeguarding and administering investments or holding client money
17. Administrative functions in relation to managing investments

Activities covered in Directory
18. Administrative functions in relation to effecting or carrying out contracts of insurance which are life policies
19. Administrative functions in relation to the operation of stakeholder pension schemes
20. Advising or arranging (bringing out) regulated mortgage contracts for a non-business purpose
21. Advising or arranging (bringing out) equity release transactions
21A. Designing scripted questions for execution-only sales of regulated mortgage contracts for a non-business purpose
22. Designing scripted questions for execution-only sales of equity release transactions
23. Overseeing execution-only sales on a day-to-day basis in relation to equity release transactions

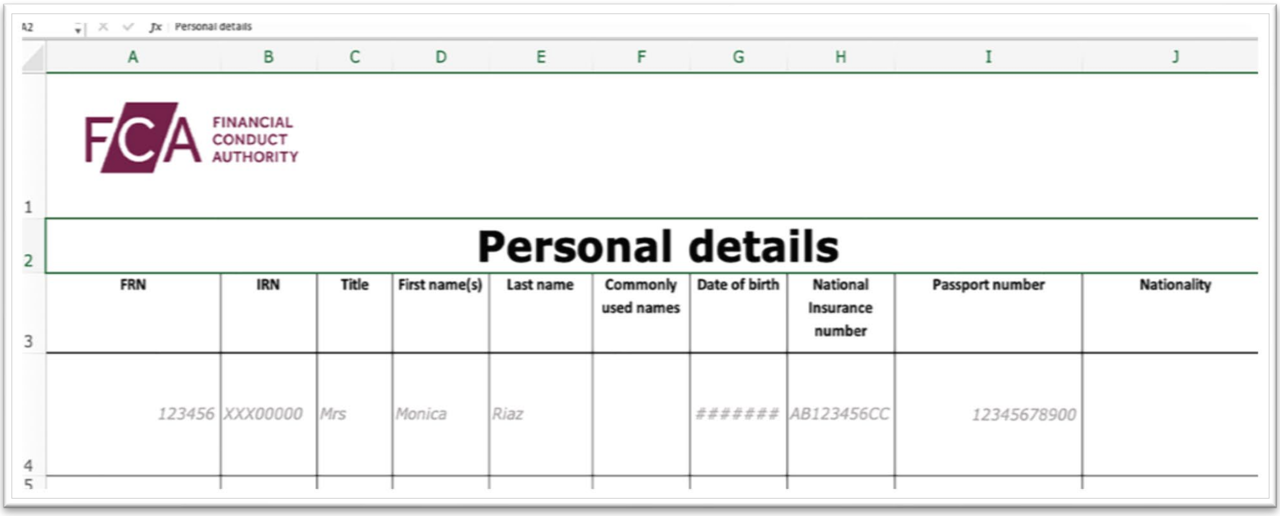
Accreditations
CFA Society of the UK
The Chartered Institute for Securities and Investment (CISI)
The Chartered Banker Institute (CBI)
The Chartered Insurance Institute (CII)
The London Institute of Banking and Finance (LIBF) - formerly known as IFS

3. Using the Multiple Add template

The Multiple add template allows you to submit multiple Directory Person records in a single application. You can use the multiple add template to:

- add new Directory Persons
- add new roles
- add new activities
- add new accreditations
- add new workplace location
- add new customer engagement method

The template you need to complete looks like the ***illustration below***.



FINANCIAL CONDUCT AUTHORITY

Personal details

FRN	IRN	Title	First name(s)	Last name	Commonly used names	Date of birth	National Insurance number	Passport number	Nationality
123456	XXX00000	Mrs	Monica	Riaz		#######	AB123456CC	12345678900	

Each row represents a single Directory Person's entry (individual) for a single legal entity.

If an individual works for multiple legal entities, please submit a separate application for each entity

Multiple add process includes:

Capture:
input your information in the Multiple Add template - be mindful of rules and guides

Upload:
The correctly completed Multiple Add template into Connect

Submit:
Submit application and check that the file was uploaded correctly

Next steps:
View application feedback file to ensure no errors occurred / amends required

4. Capture

What do you need to do?

- Complete the required fields on the template.
- Be aware of the required format for each field.
- Be aware of the rules relating to roles, activities, customer engagement methods and workplace location.

Important information you need to know when completing the template

- The header cell of each column contains help text (if needed). Hover over the header cells to display the text.
- Do not remove or edit the top 3 rows.
- Do not add formatting to the spreadsheet (e.g. cell borders) as this may corrupt the file when it is saved to .csv.
- Some cells contain validations. Do not change them or your submission is likely to fail.
- Do not use commas as they will cause your submission to fail.
- Do not leave blank rows. For example, do not fill in row 10 and 12 but leave row 11 blank. If you do any data after row 10 will not be processed.

Hints & Tips:

Where an individual has had a gap in service:

1. First submit the historical role using single add or multiple add.
2. Check the Application feedback file to confirm that the historical role submission has been processed
3. Then add the current role.

Warning! If you submit current role first and then historical message later, you will get an error message

Use the formats and rules in the following table when completing the template. Please follow these carefully – if there are errors your file will not be processed.

	Data field		Format	Required?	
Firm details	FRN		Numeric – 6 to 7 characters		
Personal details	IRN		Alphanumeric – 8 characters		
	Title		Predefined drop-down list		
	First name(s)		Free Text field		
	Last name		Free Text field		
	Commonly used names		Free Text field		
	Previous name	Title	Free Text field	Optional when providing previous name	
		First Name	Free Text field	Mandatory when providing previous name	
		Last Name	Free Text field	Mandatory when providing previous name	
		Date of change	Numeric – (dd/mm/yyyy)	Mandatory when providing previous name	
	Date of birth		Numeric – (dd/mm/yyyy)		
	National Insurance Number ^1		Alphanumeric – 2 Alpha followed by 6 numeric followed by 1 Alpha		
	Passport number^2		Free Text field		
	Nationality		Predefined drop-down list	Mandatory when providing passport number	
Directory Person role details	Relevant roles currently held		Predefined drop-down list – More than one can be selected		
	Date started role		Numeric – (dd/mm/yyyy) - Can be up to 3 months in the future		
	Role end date		Numeric – (dd/mm/yyyy) - Can be up to 3 months in the future but must be after the start date		
				For customer engagement roles requiring qualification	Other roles
	Activities which the Directory Person carries out		Predefined drop-down list – More than one can be selected		
	Customer engagement method(s)		Predefined drop-down list – More than one can be selected		
	Workplace location(s)^3		Alphanumeric – 8 characters – Up to 5 postcodes can be provided		
	Relevant Accredited Body the Directory Person is a Member of for customer engagement roles requiring qualification only		Predefined drop-down list – More than one can be selected		

Key:	
(green)	Always required
(yellow)	Where applicable
(red)	Not required

1. National Insurance (NI) number: It is mandatory to provide a NI number if the Directory Person has one (see SUP 16 Annex 47AR(4-5) & SUP 16 Annex 47BG(2)).
2. Passport number: Provide the passport number and nationality if the Directory Person does not have an NI number.
3. The workplace location field may be left blank if a firm believes that making a Directory Person's workplace location public would put them at risk.

The following fields are applicable when one or more customer engagement roles requiring qualification have been selected in the 'Relevant roles currently held' field:

- Activities the Directory Person carries out.
- Customer engagement method(s).
- Workplace location(s).
- The accredited body of which the Directory Person is a member.

Saving your file:

Note: To ensure your file is processed promptly, please don't exceed a file size of 5MB (megabytes). The number of rows you can populate will depend on how many columns are used. For example:

- 100% (96) columns populated = approx. 1500 rows
- 50% (48) columns populated = approx. 2000 rows
- 25% (24) of columns populated = approx. 2500 rows

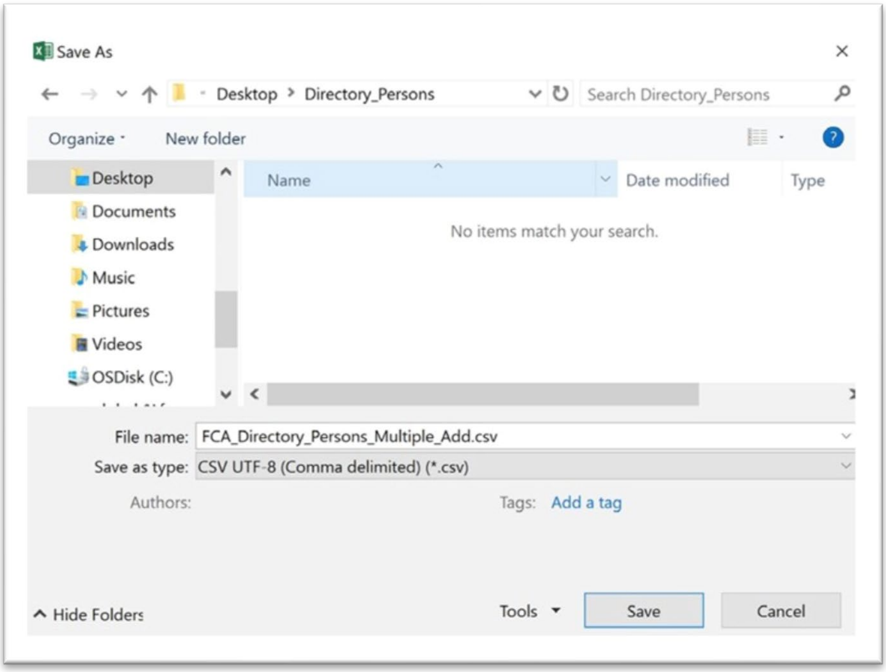
If you need to submit more information than this, you can do so by submitting another application and uploading a file with the remaining information.

When you have completed the template with all the information in appropriate fields, save the file in the CSV UTF-8 format (comma separated values), and **not** as .xls (Excel spreadsheet). Do not save it as a CSV UTF-8 until you are ready to submit, as doing so will remove the template formatting.

When saving the file, ensure you are on the form that contains the information you have populated, as the CSV UTF-8 format removes all other tabs.

The name of your file should be:
'FCA_Directory_Persons_Multiple_Add.csv' and saved on a local drive. Do not use any spaces or special characters in the file name.

When you have saved the file, you are ready to upload to Connect



Saving as a .csv file

5. Upload

To upload your completed **Multiple Add** template:

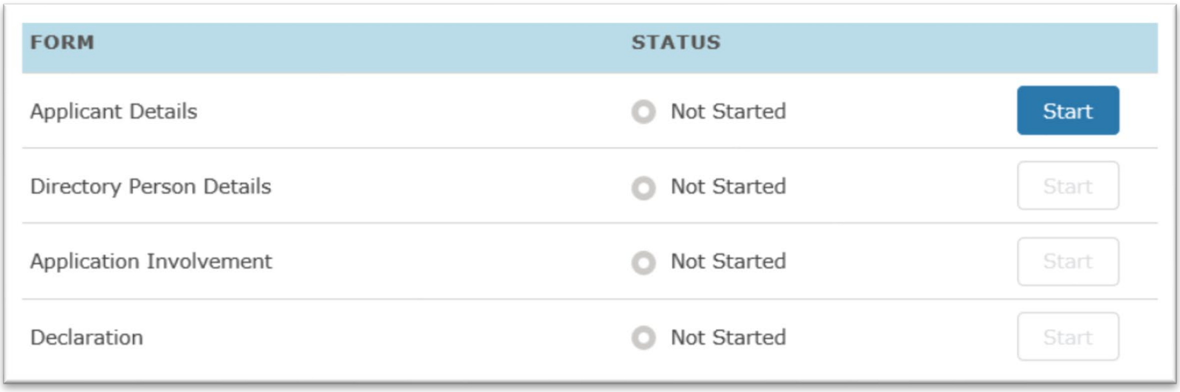
> **Please Note:**
> All screenshots provided are for illustration purposes only. Actual content and design may differ on Connect.

1. Log into your Connect account.
2. Click on 'Start an Application' – this button is on the left-hand side of the screen

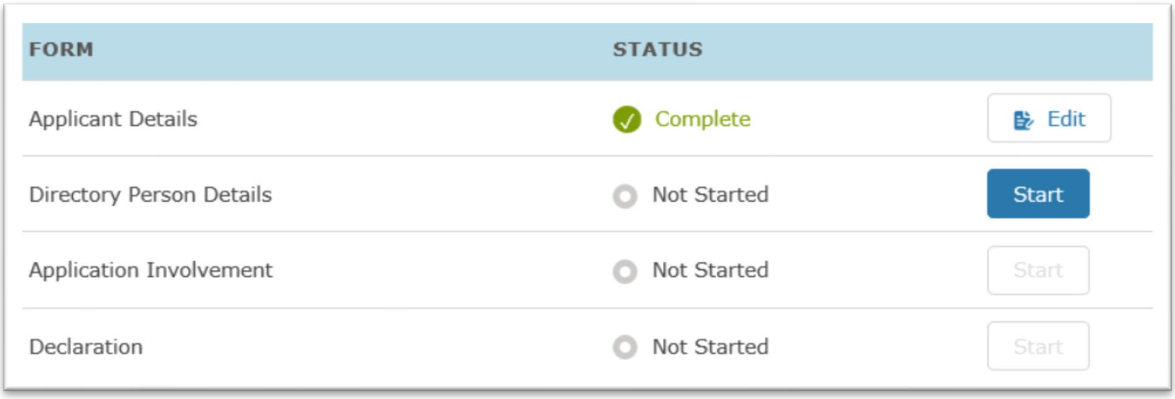
3. Select the section 'Directory Persons'.

4. To add Directory Person(s), select 'Start Application'.

5. Complete the 'Applicant Details' section. The '**Applicant**' is the person submitting the notification. This is not for the details of the Directory Person.



6. When you have completed the 'Applicant Details' section, select the 'Directory Person Details' section.



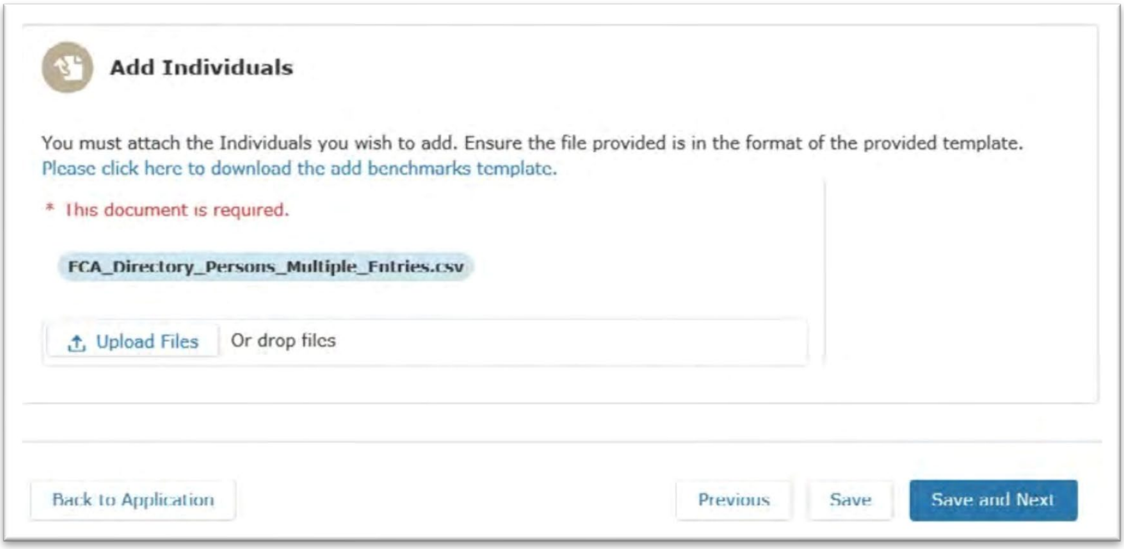
7. Select the 'File Upload' option.

Please Note:
You can complete these steps before starting to populate the template.

When you select 'File Upload', you can download the template via a link.

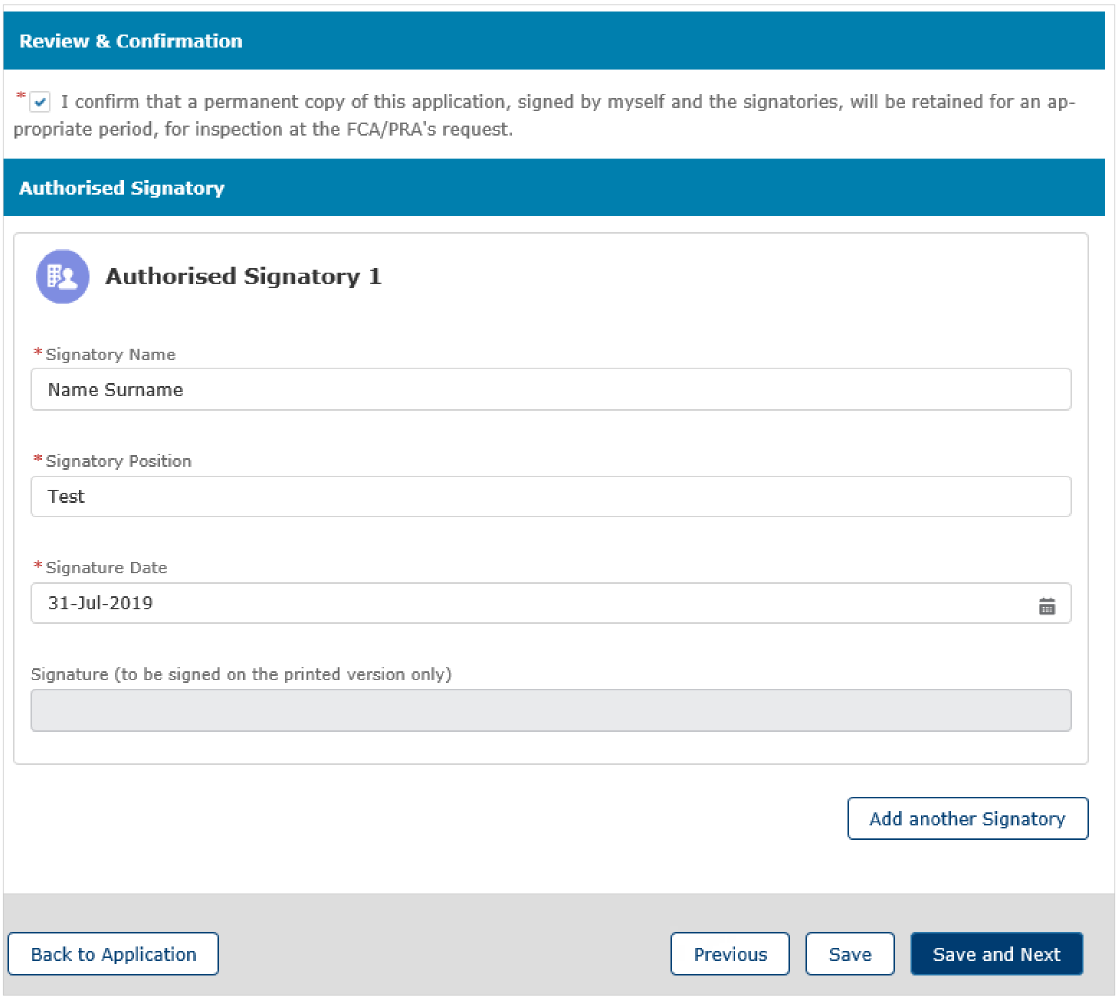
8. Upload your file(s) or drop them in the box shown below.

9. The file(s) you upload will appear on the screen. Select 'Save and Next'.



10. When you have completed this, the 'Directory Person Details' and Application Involvement' sections will appear as complete. Next, click on the Start button for 'Declaration'.

11. Read and complete the declaration page. Then click on 'Save and Next



Please Note:
It is not necessary to print, sign and retain your application. You can view your application on Connect. However, please check the box to continue.

6. Submit

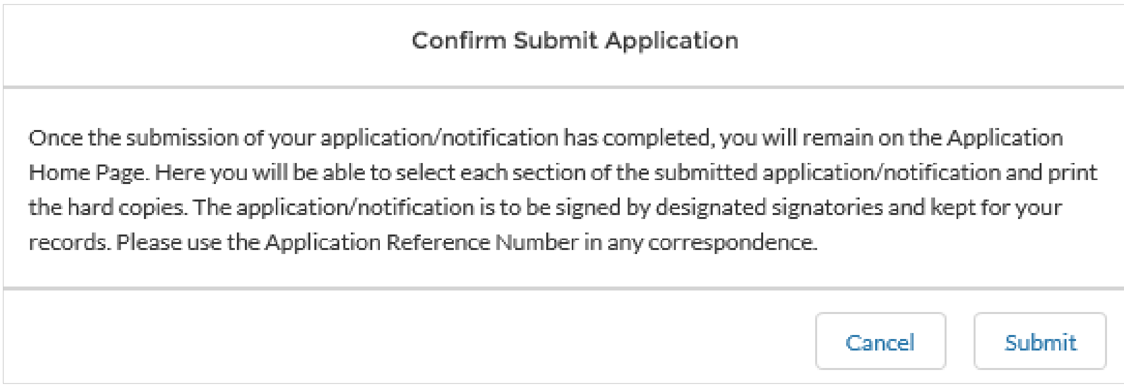
What you need to do:

- Submit the application.
- Be aware of what to do if the file contains errors or if we can't accept some of the information you have provided.
- Check the file has been processed successfully.

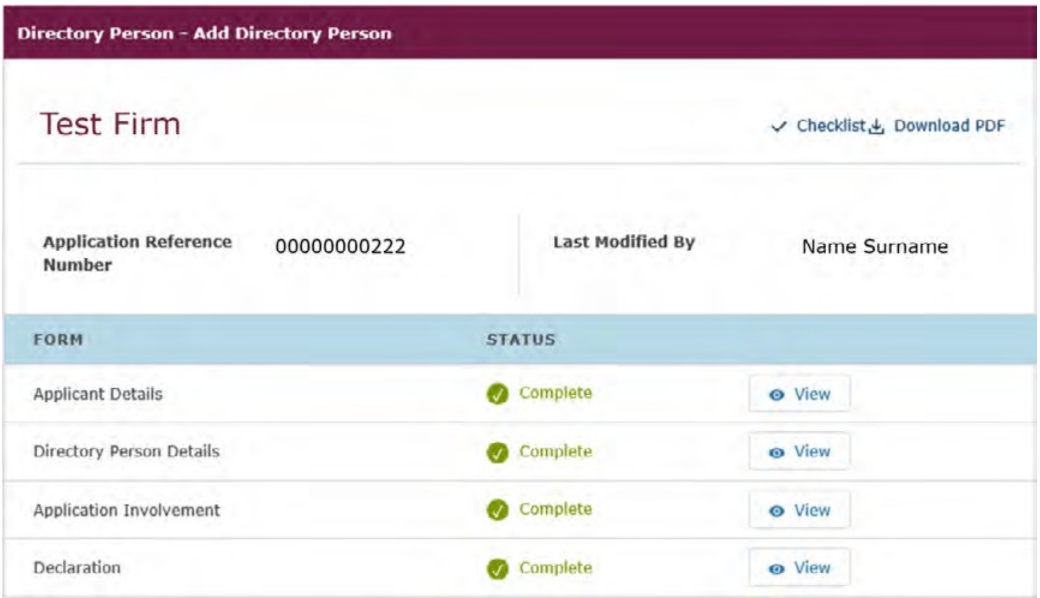
When the file you wish to submit has been successfully uploaded, you will need to submit the application so we can start processing the information and publish it on the FS Register.

1. You are now ready to submit. Click on 'Submit Application'.

2. You will see the following information box. Click 'Submit' to proceed.



3. On the next screen, you can choose to view the information you submitted either by viewing each section separately or by downloading a pdf version of your submission. You won't be able to see the content of your Multiple Add file, but you will see the name of the file you submitted, and your application reference number.



Directory Person - Add Directory Person

Test Firm

Checklist Download PDF

Application Reference Number	00000000222	Last Modified By	Name Surname

FORM	STATUS	
Applicant Details	Complete	View
Directory Person Details	Complete	View
Application Involvement	Complete	View
Declaration	Complete	View

4. We now have your file and you can log out. We will email you further information about processing your data.

7. Review and Next steps

When you have uploaded and submitted the Multiple Add template, we will perform several checks on the data to ensure it is ready to publish on the FS Register.

Upon receipt of your Bulk Add Directory submission, we will check your data and process your application. We will then create a feedback file (Feedback.csv) in Connect, which details the outcome for each individual submitted.

You will receive a standard email asking you to check your feedback file on Connect. All firms will receive this email and a feedback file regardless of whether there are errors in their submission. You can find the feedback file in the 'Directory Person Detail' section of the submitted application.

Access your feedback file from the Directory Person detail section: The path is as follows, select - >Application Reference Number -> View Application -> Directory Person Details -> feedback.csv.

View the status of each individual in the feedback file. This allows you to easily check which individuals have been processed successfully, and which must be resubmitted.

The feedback file contains:

- A list of all the individuals submitted as part of the bulk notification, not only those with errors.
- Details of which individuals have been processed as part of the submission, along with the IRNs for any new individuals.
- If an individual has failed, there will be an error message explaining the error in the relevant row. If the individual row has been processed without error, there will be no details in the error column.
- A new 'IRN Status' column that will indicate whether it's a new individual (previously unknown to FCA) with the value 'New Individual' populated, or it's an existing individual with the value 'Existing Individual' populated.
- If we cannot process your data due to an incorrect file format, incorrect template or the template being modified you will receive a single piece of feedback on the whole submission. For example, 'Columns missing or file is corrupted. Please do not modify the csv file once converted from xlsx'.

If there are no errors in the data, we aim to publish the information within 24 hours. From later this year for banks and insurers and from end of December 2020 for all other firms.

NOTE: Before 7 September 2020, we sent 2 emails when we processed a Bulk Add Directory Submission: one to confirm the processing status of the application, and another listing the successfully processed IRNs. Our new process aims to simplify the way you receive feedback.

Understanding the feedback file

Individual Status column	Error column	Description of the scenario
New Individual		Record has been successfully processed and new individual created
Existing Individual		Record has been successfully processed and existing individual record has been updated
Existing Individual	Populated with error message	An existing record has been identified for the individual, but it has not been processed. Submit a new application after correcting the error message.
	Populated with error message	No existing record has been identified (except when there is a Personally Identifiable Information mismatch error) and the record has not been processed. Submit a new application after correcting the error message.

To help you determine which template you should be using (Multiple Add or Multiple Amend), please refer to the following table:

Use Cases	Single Add	Single Amend	Multiple Add	Multiple Amend	Note
Add new Directory Persons	✓		✓		
Add new roles	✓	✓	✓		
Add new activities	✓	✓	✓		
Add new accreditations	✓	✓	✓		
Add new workplace location	✓	✓	✓		
Add new customer engagement method	✓	✓	✓		
End date existing roles		✓		✓	When all roles are end dated, all activities will end as well.
Update name (title, first name, last name or commonly used name)	✓	✓			You can also hide previous name using single amend form
Update Passport Number	✓	✓			
Update Nationality	✓	✓			
Update National Insurance Number	✓	✓			
Remove existing activities		✓			
Remove existing accreditations		✓			
Remove existing workplace location		✓			
Update customer engagement method		✓			
Overwrite existing activities				✓	This will replace existing data with the information provided
Overwrite existing accreditations				✓	

Use Cases	Single Add	Single Amend	Multiple Add	Multiple Amend	Note
Overwrite existing workplace location				✓	in the bulk amend spreadsheet. No change will be made if no data is provided for an attribute. E.g. – if no activities are listed in the Multiple Amend spreadsheet, then the existing activities will remain unchanged.
Overwrite existing customer engagement method				✓	
Update start-date		✓		✓	

Access your feedback file from the Directory Person detail section: The path is as follows, select - >Application Reference Number -> View Application -> Directory Person Details -> feedback.csv.

8. Support

Contact us
0300 500 0597

Policy Statement 19/7:

Directory Persons webpage

Directory Persons data collection: Q&A

FINANCIAL
CONDUCT
AUTHORITY

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