

# Credit Broking Survey - Frequently Asked Questions

This document covers the most common questions you may have about the survey.

The FAQs are split into three sections:

- I. About the survey
- II. Completing the survey
- III. How to answer specific survey questions

Please answer the survey questions based on your immediate judgement and on a best efforts basis. We do not expect firms to carry out any additional work in order to complete the survey.

## **I. About the survey**

### **1. Why is the FCA conducting this survey?**

We are seeking to update the information we hold on firms with the credit broking permission.

Our three operational objectives are to:

- protect consumers – we secure an appropriate degree of protection for consumers
- protect financial markets – we protect and enhance the integrity of the UK financial system
- promote competition – we promote effective competition in the interests of consumers

Updated information will help us identify emerging risks of harm to consumers, the market and competition within it, and enable us to advance our operational objectives.

### **2. Have you sent the survey to all firms?**

After a pilot in May, the survey is being sent over two weeks from 5 July to all remaining firms holding the permission of credit broking, around 32,000 firms.

### **3. What is the deadline for completing the survey?**

The deadline for completing the survey is in the email we sent to you with the link to the survey. Firms will have 15 working days to complete it.

### **4. I won't be able to submit the survey by the deadline specified. What should I do?**

Please answer the survey questions based on your immediate judgement and on a best efforts basis. We do not expect firms to carry out any additional work in order to complete the survey. 95% of firms in the pilot completed the survey within 30 minutes.

If you are not able to provide the information by the deadline, please contact our Supervision Hub on **0300 500 0597** from the UK or **+44 207 066 100** from abroad, or via email at [firm.queries@fca.org.uk](mailto:firm.queries@fca.org.uk). We may be able to agree a short extension.

## **5. Is this survey mandatory to complete and return?**

Whilst we are not seeking this information under our formal information gathering powers, we expect firms to complete it. We would remind firms of their obligations under [Principle 11](#) to deal with their regulators in an open and cooperative way. We have designed the survey so that it is quick and simple to complete.

## **6. What happens if my firm does not respond to this survey?**

Supervision may contact you to find out whether you are having any difficulties completing the survey. In some cases, we may choose to use the FCA's statutory powers to request this information, if we consider that a response from your firm is necessary for our work to mitigate the risks of harm to consumers.

## **7. I have the credit broking permission but have not received the survey?**

We are sending the survey out over a 2-week period from 5 July. If you are concerned that you have not received the survey email, you may wish to check your junk or spam folders, before emailing the Supervision Hub at [firm.queries@fca.org.uk](mailto:firm.queries@fca.org.uk).

## **8. Is this a one-off exercise? Will you be sending the survey to more firms over time?**

This survey will be sent to all firms holding the credit broking permission. While we do not currently have plans to repeat this exercise on a regular basis, we may revisit this in future and decide to run a further similar survey again.

## **9. My firm has already/recently received questions on the areas covered in the survey from another area of the FCA and I've now received this request. Do I need to answer both sets of questions?**

Yes. It is unlikely that your firm will have received a recent request for similar information as we coordinate our work to avoid unnecessarily burdening firms. If you have, we still expect you to complete this survey as it contains additional, broking specific questions and relates to your current circumstances, which may have changed since you last provided information to the FCA.

## **10. How does this survey link to other surveys that have been sent out by the FCA?**

This survey is specific to your firm's current use of the credit broking permission. Other surveys are likely to cover different periods and data.

## **11. Do you not already have the answers to these questions from data you already hold, for example from firms' regulatory returns?**

Firms may have changed their business models since their last contact with the FCA or may no longer need the credit broking permission. This information is not included in regulatory reporting.

## **12. Will you cross-check my survey answers with the data you already hold, for example from my firm's regulatory returns?**

We use our data to supervise the financial services market and we will ensure a consistent and coherent approach. We will use the survey data in addition to the data in our regulatory systems to inform our view of firms.

## **13. Are the answers firms provide to this survey confidential?**

We understand concerns you may have about confidentiality and will ensure that our obligations in this respect are not breached. Where the information we receive from you for this work is "confidential information" under Section 348 of FSMA, we will not disclose this unless a gateway is available or we receive your consent and, if different, the person to whom it relates.

Information is not confidential information if generally:

- the information is already lawfully publicly available
- it is in the form of a summary or collection of information framed in a way that it is not possible to ascertain from it information relating to a particular person.

The purpose of the survey is to update the information we hold on how your firm is using its credit broking permission. Our privacy notice can be found on our [website](#) where you can find out more about your rights and in particular, our use of personal data in respect of this survey. The webpage outlines the basis for this work which is being carried out in the public interest to allow us to undertake our statutory functions.

#### **14. How will my firm's information be stored?**

We will store the information securely and in line with our [published data strategy](#).

Our [retention policy](#) sets out how long we hold all information, including any personal data used for each of the areas mentioned in this privacy notice.

#### **15. Will you publish the findings to this survey?**

We may decide to publish certain data from the survey in aggregate as part of our Supervision work. We will not publish individual firms' responses.

## **II. Completing the survey**

#### **16. Who should I contact if I have any questions about the survey?**

If you have any additional questions not answered here, you can contact our Supervision Hub on **0300 500 0597** from the UK or **+44 207 066 100** from abroad, or via email at [firm.queries@fca.org.uk](mailto:firm.queries@fca.org.uk). Please do not respond directly to the email with the link to the survey, as this is from a no-reply address.

#### **17. How long will the survey take to complete?**

95% of firms in the pilot completed the survey within 30 minutes.

#### **18. Can I see the questions in advance of completing the survey?**

The first page of the survey allows you to preview the questions in a PDF document. This is for information only. Please **do not** complete the survey within the PDF document. You can view the PDF at any time by clicking back through the survey to the first page.

*Note: the PDF contains all questions and messaging for different scenarios, including for example, validation warnings. Firms will only see what is applicable to them based on how they answer the questions. Therefore, firms will not see all the content shown on the PDF.*

#### **19. Can answers be saved part way through and is it possible to return to complete the survey in another session?**

Your answers will be saved automatically. It is possible to return to the survey in another session, but once the "Submit" button has been selected, the survey will be locked. If you need to make any further changes please contact our Supervision Hub to ask for it to be re-opened. You can contact the Supervision Hub on **0300 500 0597** from the UK or **+44 207 066 100** from abroad, or via email at [firm.queries@fca.org.uk](mailto:firm.queries@fca.org.uk)

#### **20. How did you determine who the survey is sent to?**

We are sending the survey to all firms holding the credit broking permission using the contact details we hold for your firm. For details of our privacy policy, please visit <https://www.fca.org.uk/privacy>.

**21. Can anyone submit the survey on behalf of a firm?**

Yes, if you want someone else at your firm to answer the survey, or a third party (such as a consultant) who works on your behalf, then you can forward the email/link to them. Otherwise you should keep the link secure as it is specific to your firm.

**22. What should I do if my link does not work?**

You can request a new link by contacting our Supervision Hub on **0300 500 0597** from the UK or **+44 207 066 100** from abroad, or via email at [firm.queries@fca.org.uk](mailto:firm.queries@fca.org.uk). Please do not respond directly to the email with the link to the survey, as this is from a no-reply address.

**23. Will you contact my firm after we have submitted the survey?**

We will not send you an email to confirm we have received your submission (this will be confirmed on the survey page once submitted). We may contact you after the survey should we need further information or clarification.

**24. Can I get a copy of my answers?**

On submission, a summary of your responses will be provided for your records, please click 'download PDF' to download a copy of your response. You will not be able to return to the survey after submission.

**III. How to answer specific survey questions**

**25. If my firm carries out regulated and unregulated business how should I answer?**

We are interested in your regulated credit broking activities only. However, as with all questions in the survey, please answer based on your immediate judgement and on a best efforts basis. We do not expect firms to carry out any additional work in order to complete the survey.

**26. If my firm is part of a group, how should I answer the questions?**

Please give answers specific to your firm only, not any group firms. If there is more than one regulated entity within the group they may also separately receive the survey for completion. If some questions relate to items only recorded at group level for your firm then please answer on a best efforts basis. This applies to all questions in this survey.

**27. Should I include the activities of my Appointed Representatives in my answers?**

No, please give answers specific to your firm only. Please do not include the activities of any Appointed Representatives.

**28. I do not know the answer to a question and/or I will need to look up information to answer a question. What should I do?**

Please answer the survey questions based on your immediate judgement and on a best efforts basis. We do not expect firms to carry out any additional work in order to complete the survey. It does not ask for detailed information or precise numbers.

**29. Questions 1.1 and 1.2 refer to carrying out activities which require the credit broking permission. I don't know if my firm needs this permission.**

In very simple terms, credit broking is where firms introduce individuals or relevant recipients of credit to a lender or hirer or where they introduce them to another credit broker (it also involves other pre-contract activities). The activities that fall within the definition of credit broking are contained in the FCA Handbook at [PERG 2.7.7E](#).

If you are unsure why you have the credit broking permission, please review the rest of the survey as this may help you to understand which activities require the permission.

You may find it helpful to review some typical misconceptions about the way we authorise credit brokers, [here](#).

If you are still unsure whether you need the broking permission, please seek advice.

You can also contact our Supervision Hub on **0300 500 0597** from the UK or **+44 207 066 100** from abroad, or via email at [firm.queries@fca.org.uk](mailto:firm.queries@fca.org.uk).

### **30. I don't need the credit broking permission any more. What should I do?**

If you believe your firm no longer needs the credit broking permission and your firm holds other permissions, you should seek advice as necessary and consider submitting a variation of permission application to remove it.

If your firm holds the credit broking permission only, which is no longer needed, then you should consider submitting a cancellation application via the Connect portal rather than a variation of permission. Again, if you are unsure whether you still need the permission you should seek advice.

You can find out how to submit a [variation of permission](#) or [cancel an authorisation](#) on our website.

### **31. At questions 3 to 6, what are the definitions of "solely", "predominantly", "some" and "trace"?**

The option you select for each credit broking scenario should reflect the extent to which it accounts for your firm's credit broking activities **only**, and **not** your firm's business model as a whole. For example, if your credit broking activity connected to the supply of goods by your firm is small compared to your overall business activity, but it is the **only** credit broking that you undertake, then it should be reported as "solely" under the options below.

You should answer this question based on your immediate judgement and on a best efforts basis. We do not expect firms to carry out any additional work in order to complete the survey.

If you are unsure how to answer, please see the following guide:

- "Solely" – Select where this activity makes up **all** of your regulated credit broking activity
- "Predominantly" – Select where this activity makes up **more than half** of your regulated credit broking activity
- "Some" – Select where this activity makes up **less than half** of your regulated credit broking activity
- "Trace" – Select where you carry out this activity **only rarely** as part of your regulated credit broking activity

### **32. I'm an IFA. How should I answer the survey?**

If you are an IFA that undertakes credit broking only in relation to or because of financial advice provided to consumers, then you should select 'Other credit broking' as the type of broking at question 3.4 and 'Providing financial advice' at question 6.1 under the further options provided.

**33. My firm is an insurer. How should I answer the survey?**

If your firm is an insurer that allows individuals time to pay or otherwise provides them with a financial accommodation to pay for your insurance, this activity may constitute regulated lending, but that is not relevant to the survey.

If your firm is an insurer that introduces individuals to lenders who fund the insurance premiums then where that constitutes regulated credit broking, you should report this under the 'Supplier' option within the survey at question 3.1.

**34. My firm does not carry out any broking activity itself and only holds the credit broking permission because it provides regulatory cover for my firm's appointed representatives. How should I answer the survey?**

If your firm only holds the credit broking permission because it is a Principal firm providing regulatory cover for others and does not undertake credit broking in its own right, you should answer No and No to questions 1.1 and 1.2. You may see a message about considering surrendering the firm's permission as the firm is not carrying out any broking activities. However, the firm will need to retain its permission for this business model.

**35. My firm holds the credit broking permission because of the benefit package it offers to staff, for example a cycle to work scheme. Do I still need to complete the survey?**

Yes – you should still complete the survey. Typically, we would expect broking of this type to be captured at question 3.4 under 'Other credit broking' and at question 6.1 under 'Other activities'. You will then be asked to describe the activities in a free text box.