



FCA Feedback to the Interim Working Group's (IWG) Final Report

July 2025

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Final report feedback

Introduction

The Interim Working Group's (IWG) work has laid a strong foundation for the next phase in delivering the intended outcomes of the Credit Information Market Study (CIMS). We continue to support the new governance arrangements through the formation of a Credit Reporting Governance Body (CRGB). We see its purpose and objectives as fundamental for the delivery of wider improvements in the credit information sector.

Improved self-governance, alongside consistency and quality in data sharing, supports our growth objective – including more effective credit allocation, enhancing productivity and building consumer trust and confidence in the market.

We would like to thank the IWG Chair Jacqueline Keogh, Secretariat, members and wider stakeholders for their work in delivering the final report. This is an important milestone, and we appreciate the considerable time, effort and collaboration this has taken. It marks the conclusion of an extensive, detailed process, during which the IWG considered a broad range of stakeholder views and addressed a complex set of issues.

We encourage the industry to continue to support the CRGB's objectives to deliver the improvements in its envisaged outcomes.

Our approach to feedback

Overall, we support the report's recommendations and consider they are well-reasoned and strike the right balance between different interests. We are also pleased where the final IWG report has incorporated our feedback on its preceding reports and papers. Therefore, in this document, we focus our feedback on key areas that the IWG, and thereafter the CRGB may wish to consider further, rather than commenting on the recommendations in their entirety.

We start by acknowledging the IWG's position on challenging issues and then focus our feedback on the structure and function of the CRGB, our role and interaction with the CRGB, the CRGB's safety mechanisms in decision-making, and commercial credit data. We end by discussing the next steps for industry governance reform.

We are pleased to see that the transitional arrangements from the IWG are already under way and that the new body has been incorporated in the name of the Credit Information Governance Body (CIGB). However, for consistency with the IWG's report, we will continue to reference the Credit Reporting Governance Body (CRGB) in this response.

The IWG's progress on challenging issues

Throughout its work, the IWG has considered a range of views from different stakeholders, and parties have had to reach compromises to ensure the CRGB's overall approach is one that a wide range of stakeholders can support. We particularly recognise how the IWG has dealt with the following challenges:

- CRGB's purpose of providing effective governance of credit information for all consumers and other stakeholders, of which we remain fully supportive.
- The consideration of how credit information can support financial inclusion, and the greater emphasis placed on the CRGB's role in promoting good consumer outcomes. This will encourage a positive impact of governance decisions on consumers' access to credit and other products and services.

- Reaching agreement on the CRGB's Board representation. We acknowledge the IWG's arrival at a proportionate outcome, despite the inevitable range in stakeholder perspectives.
- The IWG's sensitive and carefully balanced approach and pragmatic solution in relation to its fee setting proposals.
- The inclusion of a range of advisory councils. We are very supportive of the IWG's recommendation to establish a council composed exclusively of consumer representatives, which will be critical in ensuring consumer voices are heard and meaningfully incorporated into decision-making.

Key feedback areas

Structure and function of the CRGB

The structure, composition and functioning of the CRGB are key foundations to ensuring it can advance its 3 outcome themes (improved data quality, supporting innovation and competition, and enhanced financial inclusion) and positively influence the credit information market. With this in mind, the CRGB may wish to explore the following areas further, including the CRGB's outcomes focus, the effective involvement of Credit Information Service Providers (CISPs) and challenger Credit Reference Agencies (CRAs), and future reviews of the CRGB's effectiveness.

CRGB outcomes

We welcome the IWG's thoughtful consideration of the CRGB's outcomes, including how they are relevant to different stakeholders and how they link to the CRGB's outcome themes. We particularly welcome the thinking about how the CRGB's actions may impact financial inclusion alongside competition and innovation within the market. We encourage the CRGB to also explore in its future work how it could effectively support positive outcomes in these areas. For example:

- On financial inclusion, the CRGB could consider publishing good practice regarding the use of credit data to aid financial inclusion, or co-ordinating cross-industry inclusion initiatives. The CRGB could also encourage industry to prioritise improving the reporting of defaults, forbearance, token payments and debt solutions as part of its upcoming work on common data format.
- On competition and innovation, the CRGB could consider how updates to the Principles of Reciprocity (PoR) and the delivery of industry remedies might lower any existing barriers without creating new ones, to encourage firms to improve their current offering and develop new ways of competing, in areas such as price and quality of analytics.

We welcome and support the IWG's proposal to provide quantifiable measures that evidence the CRGB's progress in advancing its 3 outcome themes. To support this, it is important that the themes continue to be framed in an outcome-focused way, and the CRGB uses that approach to measure its impact.

CISPs and challenger CRAs

We are pleased to see the unanimous agreement within the IWG on the proposed subscriber status of CISPs and challenger CRAs and commend the IWG Chair and Secretariat for their extensive efforts in reaching consensus among stakeholders. We support the CRGB's development of its own rules around CISPs' access to, and ongoing use of, consumer credit information within the PoR or equivalent. In line with the IWG's recommendation, we think it is important that CISPs and relevant parties have the opportunity to provide input during this process.

Reviews of CRGB's effectiveness

We acknowledge the IWG recommends using contract law as a framework for the CRGB to set out its governance and expectations to which the parties contract. We consider this a pragmatic solution for how the CRGB can derive its authority. We intend to monitor progress on the development of these contracts and look forward to providing input on future CRGB-led reviews on this topic, including any reviews on the need for legislative underpinning for the CRGB.

We also understand that the CRGB will review its effectiveness and source of powers in future years. With respect to reviewing its effectiveness, we encourage the CRGB to consider whether there are benefits to reviewing decision-making procedures earlier than the currently planned 4 years to ensure they work well and are applied as intended. We would also suggest considering where reviews of different processes could be carried out at the same time to take advantage of possible synergies. We look forward to providing input to those reviews, where appropriate, at the relevant time.

Our role and interaction with the CRGB

We support the IWG's recommendation for the CRGB to operate as a self-regulatory organisation, 'established with the aim of creating rules to promote order among businesses and organisations'. However, the CRGB will be expected to fulfil different tasks to those undertaken by a regulator – this includes the CRGB writing, updating and policing voluntary operational standards in the credit information market. For these reasons, and as the IWG states, ongoing engagement with regulators that reflects our respective roles will be important to enable the CRGB to effectively carry out its duties. We set out our views on these roles below alongside points that may benefit from further consideration going forward.

Memoranda of Understanding (MoUs) and ongoing engagement

The plan for the CRGB to establish MoUs with government departments and regulators during 'Stage Two' of its transition will be important for setting out areas of common interest and ways of working between the relevant organisations. We look forward to engaging with the CRGB on this. To the extent this could support the CRGB in advancing governance improvements in the credit information market in a timely fashion, the FCA would welcome engaging with the CRGB on the MoU earlier than currently set out in the IWG's final report. We encourage the CRGB to also consider whether there may be benefits from engaging early with other regulators and government departments.

We note the CRGB may seek to formalise public support for the CRGB via the FCA's recognised industry code framework. The CRGB will need to consider whether the recognised industry code or confirmed industry guidance framework, if either, is most appropriate when making a formal application to us, once the scheme rules are in place.

With respect to our relationship with the CRGB, we do not think it is appropriate for us to attend CRGB advisory council meetings unless agreed by exception. However, we agree there is a need for regular and appropriate engagement between the FCA and CRGB, the frequency of which will be determined as part of developing and agreeing the MoU.

In relation to the CRGB's funding model, we think it would be helpful to clarify that we wish to be consulted on the implications for CRGB taking forward industry-led remedies, rather than the changing of fees itself. This distinction will ensure alignment with the FCA's expected role and makes clear the scope of our consultation expectations.

The IWG describes the benefits for subscribers of being involved with the CRGB, one of which is the opportunity to influence the scope and implementation of remedies. We agree that wide participation to the CRGB will be crucial to ensure industry-led remedies are effective and representative of diverse stakeholder needs and therefore drive the

required positive change to the industry. However, in relation to FCA-led remedies, we want to remind all stakeholders that they will have the opportunity to comment, independent of their subscriber status within the CRGB.

Subscriber oversight and breaches of CRGB rules

The IWG has proposed a comprehensive process for managing non-compliance, which includes regulatory notifications to the FCA. We agree with the approach set out for CRAs. For other subscribers regulated by the Financial Services and Markets Act 2000, we think it would be appropriate to define the criteria for reporting breaches of CRGB rules to us as part of a future MoU, to ensure the degree of notification remains proportionate.

We are amenable to an agreement setting out how we would work with the CRGB if a subscriber authorised by the FCA was in breach of CRGB rules. This will also be clearly defined in the MoU. Where such breaches do not relate to FCA rules, guidance and expectations, we welcome being informed should they meet the criteria agreed as part of the MoU. However, we would not expect the CRGB to delay acting on non-compliance pending our engagement for any subscribers, including CRAs. This will ensure a proportionate and efficient response to breaches of CRGB rules.

In relation to the CRGB's complaints process, we may be similarly limited in our ability to become involved in individual complaints if the complainant is unhappy with the outcome, however, this will depend on the extent to which it relates to a regulatory activity.

The IWG posits that the CRGB will help to limit the need for FCA perimeter increase. While the FCA perimeter cannot be extended without legislative change, we agree that the CRGB's role and activity may help to manage issues that might otherwise have required regulatory intervention.

CRGB's decision-making safety mechanisms

It is key that the CRGB has effective decision-making processes that also allow for decisions to be appropriately challenged. It will be important that these opportunities for challenge do not cause undue delays or create inefficiencies in decision-making.

We recognise the importance of protecting smaller players in the market and we are encouraged by the inclusion of safeguards to promote effective and inclusive decision-making. We will monitor the implementation of the CIMS industry-led remedies to ensure that these mechanisms achieve the intended outcomes and do not give rise to unintended consequences, such as hindering progress on remedy implementation or preventing the CRGB from functioning effectively.

We agree that the minority safety net should only be invoked in relation to the implementation approach for an industry-led remedy, rather than the remedy's enactment itself. We would encourage the CRGB to consider what would be an appropriate timeframe for an organisation using this mechanism to present an alternative proposal, to prevent delays in remedy progress.

For transparency around the CRGB's complaints process, we welcome more information as the CRGB develops its process on what are considered 'straightforward' and 'serious' issues. We also encourage the CRGB to set out an appropriate timeframe for each stage of the complaints process, to manage expectations, provide transparency and offer guidance to involved parties.

With respect to the appeals process, we query whether work on the issue in question might continue while appeals on minor points are in progress and encourage the CRGB to monitor the use of appeals to ensure it does not lead to undue delays. The FCA has an interest in the CRGB's decision-making processes, particularly regarding the implementation of the CIMS industry-led remedies. We request that we are consulted where any of these remedies are the subject of the appeals process. If the

CRGB is unable to effectively implement the industry-led remedies, the FCA will, if necessary, consider the need for further regulatory involvement.

Commercial credit data

Whilst commercial credit data was outside the scope of the CIMS, we welcome the IWG giving thought to this area and how it could interact with consumer credit data. For this reason, we acknowledge that a wider conversation may be necessary on the governance of commercial credit data. We understand this may take the form of individual conversations with relevant stakeholders. Particularly, given the difference in roles between the FCA and, for example, other bodies like His Majesty's Treasury.

We view the 'CRGB grandfathering scheme', stated as 'the transition of the PoR commercial data sharing rules to the CRGB for passive management', as an appropriate way to uphold effective governance for commercial credit data. This is because good quality commercial credit data is important for commercial lending, which in turn supports growth and market integrity.

We recognise the potential synergies and benefits that may arise from considering the interaction between governance of consumer credit data and commercial credit data. We ask that the FCA and other relevant stakeholders are involved in future discussions, so that the issue can be considered holistically. We agree that any changes in this area may need to be considered over the longer-term – especially given the challenges here, such as the difference in legal frameworks governing consumer and commercial data, in addition to the fact that consumer credit data remains the CRGB's priority.

Next steps

We look forward to the implementation of the IWG's recommendations by the CRGB, reflecting the feedback we have provided above. We will continue to fund the IWG Chair and Secretariat resource for a short period, for the purpose of carrying out specific, essential transition activities that will allow the transition to the new CRGB to continue. Once these essential activities are complete and permanent CRGB staff are in place, we will cease funding this staff resource and step away to allow industry to take forward the new governance body. We expect this to be by the end of Q3 2025.

We thank the IWG and stakeholders for all their efforts. We look forward to working with the CRGB through the early stages of the transition and to continue our engagement, as appropriate and required, once the CRGB is fully set up and operational.

Abbreviations used

CIGB	Credit Information Governance Body
CIMS	Credit Information Market Study
CISP	Credit Information Service Provider
CRA	Credit Reference Agency
CRGB	Credit Reporting Governance Body
FCA	Financial Conduct Authority
IWG	Interim Working Group
MoUs	Memoranda of Understanding
PoR	Principles of Reciprocity



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