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

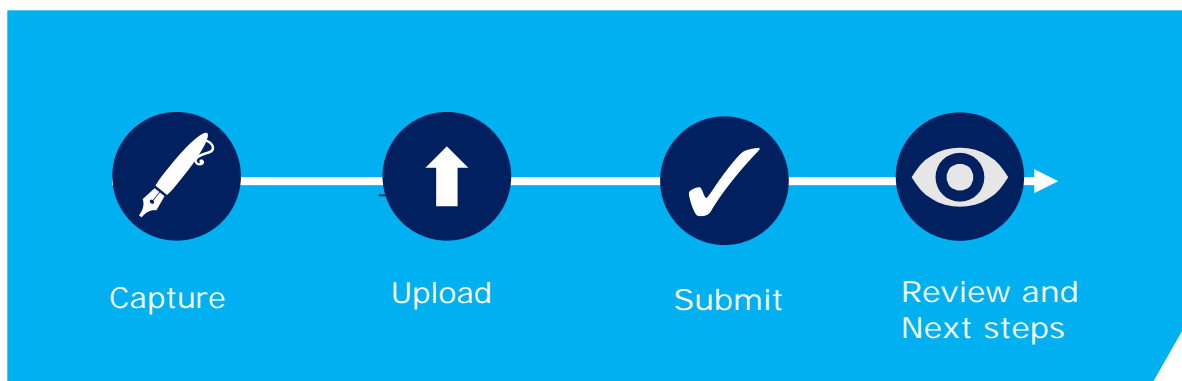For customer-facing roles requiring qualification:
- customer engagement methods
- workplace location (where relevant)
- Memberships of professional bodies

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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. Multiple Add

The Multiple add template allows you to submit multiple directory person records in a single application. You can use the multiple add template to:
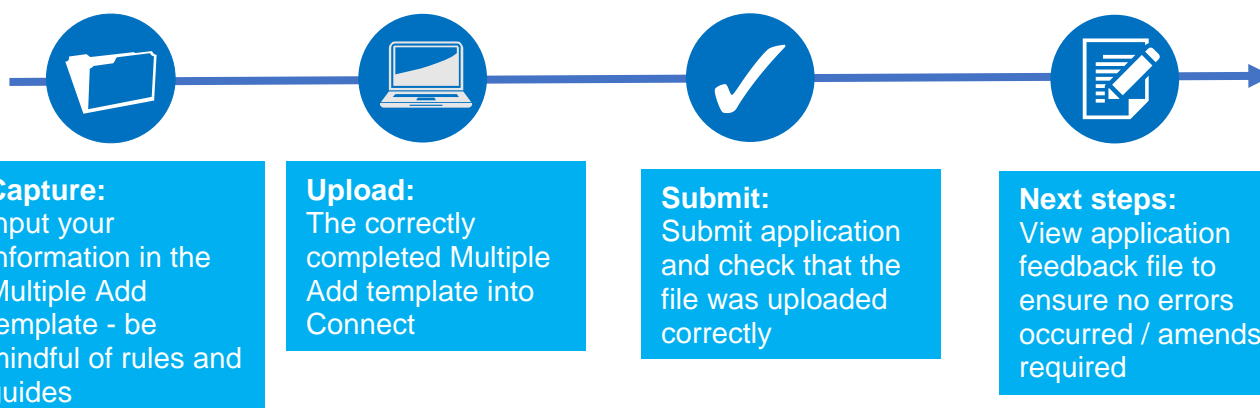
- add new directory persons
- add new roles
- add new activities
- add new accreditations
- add new workplace location
- add new customer engagement method

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

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 section covers:

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

2.1   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:	
 	Always required
 	Where applicable
 	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
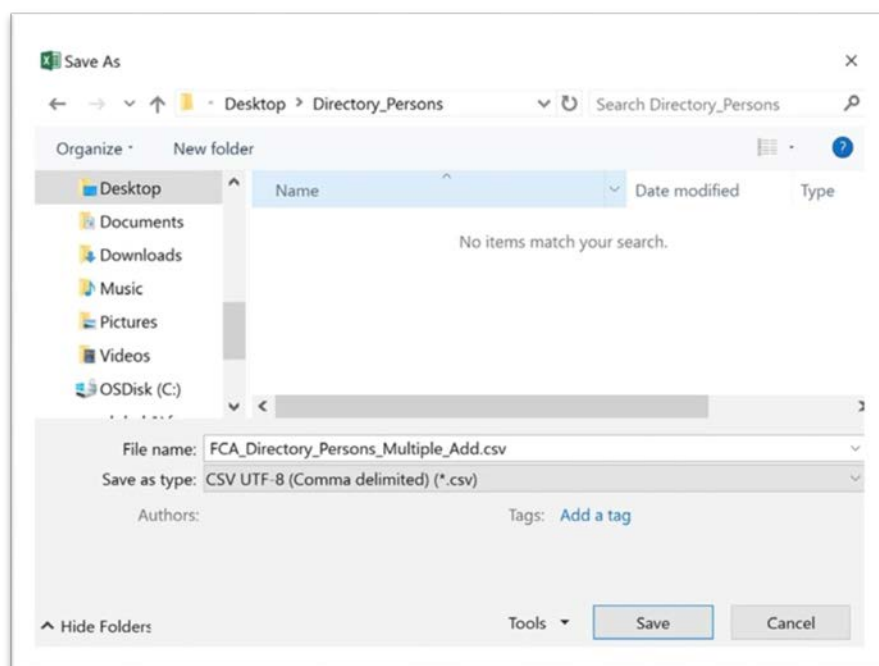
Saving as a .csv file

2.2 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

+ Start an Application

3. Select the section 'Directory Persons'.

DIRECTORY PERSONS

4. To add directory person(s), select 'Start Application'.

Add Directory Person(s)
Notification to add Directory Person(s)

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.

FORM	STATUS	
Applicant Details	◯ Not Started	Start
Directory Person Details	◯ Not Started	Start
Application Involvement	◯ Not Started	Start
Declaration	◯ Not Started	Start

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

FORM	STATUS	
Applicant Details	✅ Complete	📝 Edit
Directory Person Details	◯ Not Started	Start
Application Involvement	◯ Not Started	Start
Declaration	◯ Not Started	Start

7. Select the 'File Upload' option.

Directory Person Details

* Please choose if you wish to provide your Directory person(s) details by entering them on a notification form or by uploading a file you have compiled from our approved template.

File Upload ▾

--None--

Notification Form

✓ File Upload

i **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.

Add Individuals

You must attach the Individuals you wish to add. Ensure the file provided is in the format of the provided template.

* This document is required.

⬆ Upload Files   Or drop files

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

Review & Confirmation

* ☑ I confirm that a permanent copy of this application, signed by myself and the signatories, will be retained for an appropriate period, for inspection at the FCA/PRA's request.

Authorised Signatory

Authorised Signatory 1

*Signatory Name

Name Surname

*Signatory Position

Test

*Signature Date

31-Jul-2019 🗓

Signature (to be signed on the printed version only)

[   ]

Add another Signatory

Back to Application   Previous   Save   **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.

2.3   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.

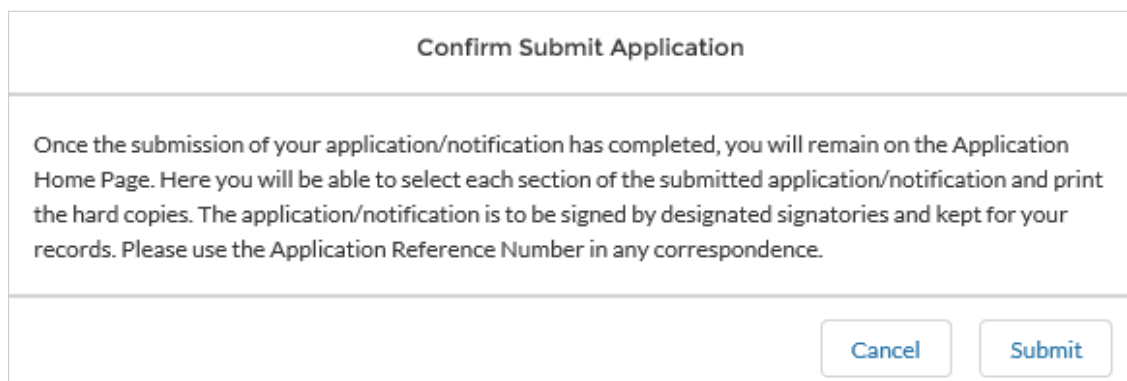1. You are now ready to submit. Click on 'Submit Application'.

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.

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

2.4   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.

Virus scan and checking for completeness — Check existing records and prohibited — Publish data on 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.

> **i** 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.

4. Multiple Amend

The multiple amend template allows you to amend multiple directory person records via a single application. You can use the Multiple Amend template to:

- end date existing roles

- update activities, accreditations, workplace location or customer engagement method

- update start date and end date for a role

Prerequisite – A firm should have added directory person details using either the single directory person notification form or the multiple add template.

Note - Updating activities, accreditations, workplace location or customer engagement method will overwrite the existing information. Therefore, you should only provide the information that should be displayed on the FS Register going forward.

The Multiple Amend template you need to complete looks like the illustration below. Each row represents a single directory person for a single legal entity. If an individual works for multiple legal entities, please submit a separate application for each entity.

Multiple add section covers:

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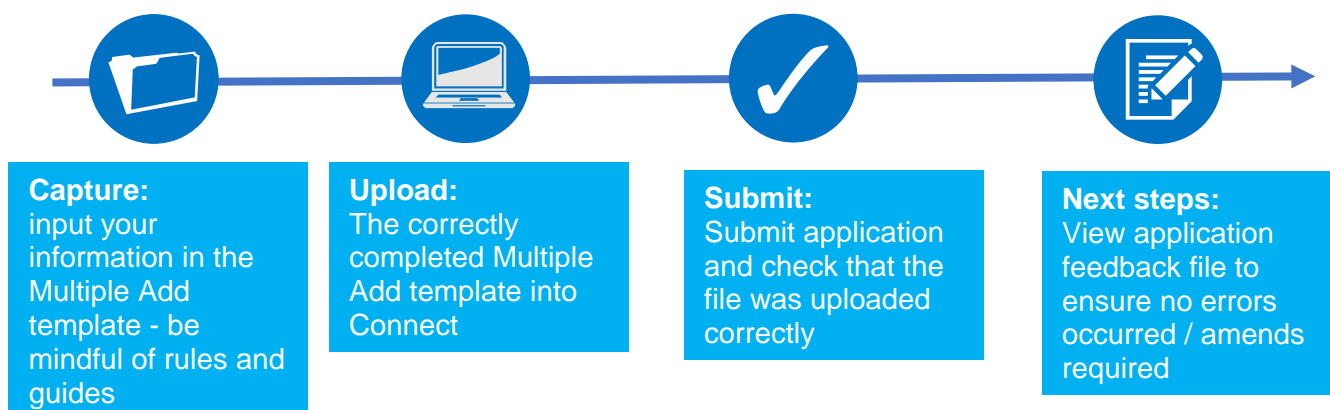
To help you determine which template you should be using (Multiple Add or Multiple Amend), please refer to the following table:

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 in the bulk amend spreadsheet.
Overwrite existing accreditations				✓	
Overwrite existing				✓	

Use Cases	Single Add	Single Amend	Multiple Add	Multiple Amend	Note
workplace location					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		✓		✓	

Please see scenarios where you cannot use Multiple Amend and your available options:

When not to use Multiple	What action to take:
To update personal details such as – first name, last name or common name	Use the single amend directory person notification to amend personal details such as – first name, last name or common names
To remove an activity which is the only activity that an individual performs	Use the single amend directory person notification form to remove the only activity that an individual performs
To remove an accreditation that is the only accreditation that an individual is associated with	Use the single amend directory person notification form to remove the only accreditation that an individual is associated with
To remove a workplace location which is the only workplace location	Use the single amend directory person notification form to remove the only workplace location for an individual

Illustration of how submitting data via Multiple Amend would impact directory person data on the FS Register using Activities as an example:

Scenario	Activities previously submitted	Activities submitted via Multiple Amend	Activities that will be displayed on the FS Register
1.	• [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] (1) CASS oversight function • [FCA CF] (2) Benchmark submission and administration • [FCA CF] (9) Algorithmic trading	• [FCA CF] (1) CASS oversight function • [FCA CF] (2) Benchmark submission and administration • [FCA CF] (9) Algorithmic trading
2.	• [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] (4) Significant management	• [FCA CF] (4) Significant management
3.	• FCA CF] (1) CASS oversight function • [FCA CF] (2) Benchmark submission and administration • [FCA CF] (3) Proprietary trader • [FCA CF] (4) Significant management	• [Blank for activities]	• [FCA CF] (1) CASS oversight function • [FCA CF] (2) Benchmark submission and administration • [FCA CF] (3) Proprietary trader • [FCA CF] (4) Significant management Note – if no activities/ accreditations/workplace locations are provided then no changes will be made to the record.

Note – The same logic applies to accreditations and workplace location.

4.1 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.

- Be aware that if you are end dating all the active roles of an individual, then all the activities, workplace locations and accreditations associated previously with this individual will also be removed.

Important information you need to know when completing the template:

- The header cell of each column contains help text (if needed). Hover over 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 UTF-8.

- 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:
> 4. First submit the historical role using single add or multiple add.
> 5. Check the Application feedback file to confirm that the historical role submission has been processed
> 6. 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 multiple amend 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	
	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	Mandatory when amending start date, end date or customer engagement method (if applicable) for an existing role
	Date started role	Numeric – (dd/mm/yyyy) - Can be up to 3 months in the future	Either start, end date or customer engagement method (if applicable) is mandatory when relevant role is populated
	Role end date	Numeric – (dd/mm/yyyy) -	Either start, end date or customer engagement method (if applicable) is mandatory when relevant role is populated
	Activities which the directory person carries out	Predefined drop-down list	
	Customer engagement method(s)	Predefined drop-down list – More than one can be selected	Either start, end date or customer engagement method (if applicable) is mandatory when relevant role is populated
	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	
Key			
	Always required		
	Where applicable		

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.*

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 (comma separated values)** format, and <u>**not**</u> 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_Amend.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 your file(s) to Connect
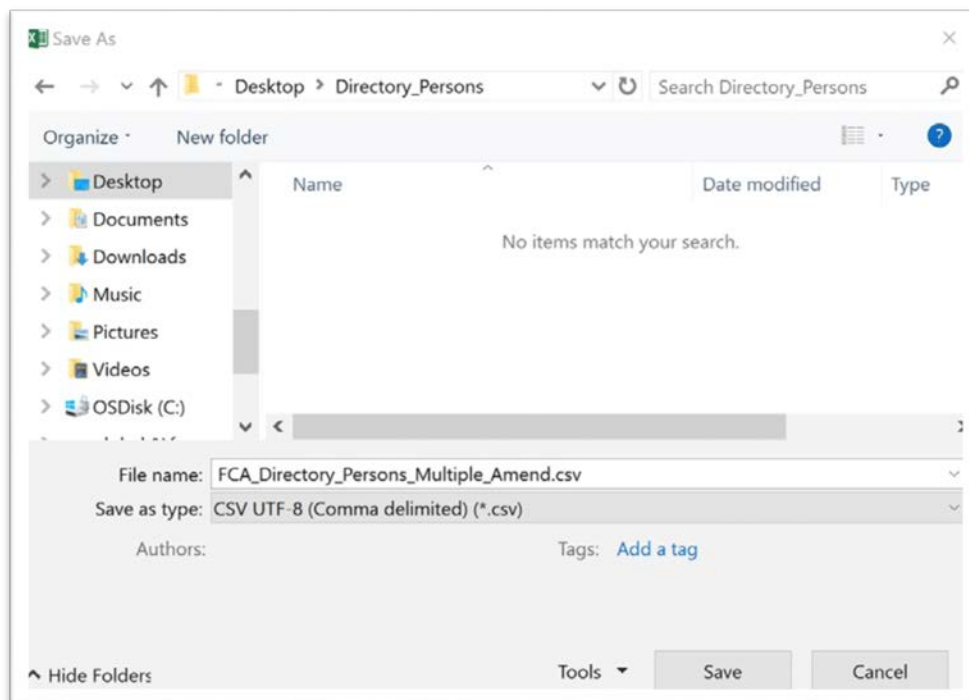
Saving as a .csv file

4.2   Upload

To upload your completed Multiple Amend template:

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 amend 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.

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7. Select the 'File Upload' option.

Directory Person Details

* Please choose if you wish to provide your Directory person(s) details by entering them on a notification form or by uploading a file you have compiled from our approved template.

File Upload

--None--

Notification Form

✓ File Upload

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.

Amend Individuals

You must attach the Individuals you wish to add. Ensure the file provided is in the format of the provided template.
fca.org.uk/publication/forms/directory-persons-multiple-submissions-template.xlsx

* This document is required.

⬆ Upload Files | Or drop files

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

Amend Individuals

You must attach the Individuals you wish to add. Ensure the file provided is in the format of the provided template.
fca.org.uk/publication/forms/directory-persons-multiple-submissions-template.xlsx

* This document is required.

FCA_Directory_Persons_Multiple_Amend.csv

⬆ Upload Files | Or drop files

10. When you have completed this, the 'Directory Person Details' will appear as 'Complete'. Next, click on the Start button for 'Declaration'.

FORM	STATUS	
Applicant Details	✓ Complete	✏ Edit
Directory Person Details	✓ Complete	✏ Edit
Declaration	○ Not Started	**Start**

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

Review & Confirmation

* ☑ I confirm that a permanent copy of this application, signed by myself and the signatories, will be retained for an appropriate period, for inspection at the FCA/PRA's request.

Authorised Signatory

🔲 **Authorised Signatory 1**

* Signatory Name

Name Surname

* Signatory Position

Test

* Signature Date

31-Jul-2019   📅

Signature (to be signed on the printed version only)

Add another Signatory

Back to Application   Previous   Save   **Save and Next**

ⓘ 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.

4.3   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'.

FORM	STATUS	
Applicant Details	✔ Complete	⊚ View
Directory Person Details	✔ Complete	⊚ View
Declaration	✔ Complete	⊚ View

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

Confirm Submit Application

Once the submission of your application/notification has completed, you will remain on the Application Home Page. Here you will be able to select each section of the submitted application/notification and print the hard copies. The application/notification is to be signed by designated signatories and kept for your records. Please use the Application Reference Number in any correspondence.

Cancel   Submit

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 amend file but you will see the name of the file you submitted, and your application reference number.

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

FORM	STATUS	
Applicant Details	✔ Complete	⊚ View
Directory Person Details	✔ Complete	⊚ View
Declaration	✔ Complete	⊚ View

4.4   Review and Next steps

When you have uploaded and submitted the Multiple Amend form, our systems will undertake several checks on the data to ensure it is ready to publish on the FS Register.

We will check your data and create a feedback file (Feedback.csv). We will email you to let you know when this available on Connect. You will be able to find the feedback file under 'Directory Person Detail' section of the submitted application. The feedback file will contain all the records you have submitted. For individual row(s) which have been processed without error, there will be no details in the error column or else you will see details of the issue in that column.

Please resolve the identified issues and submit a new notification on Connect, including the corrected records only. We will process this and contact you with the outcome.

The checks happen in a stage-by-stage process, but you will receive only 1 email confirming your application has been processed. If there aren't any 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).

Sample screenshot of a feedback file

> **i** 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.
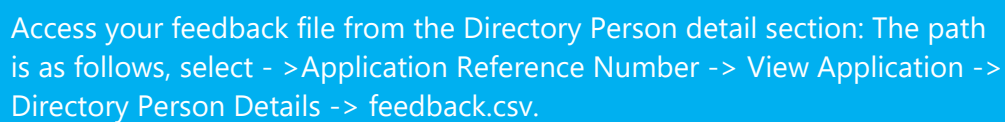
5. Support

Contact us
0300 500 0597

Policy statement 19/7:
finalising the Directory

Directory persons webpage

Directory persons data collection: Q&A

6. Questions and Answers
6.1 Policy

6.1.1 Can the individual entry form in Connect be made available as an official FCA Handbook form, to allow it to be incorporated into firms' onboarding processes?

This will not be made available as a handbook form. However, a visual representation of the information in the style of a form has already been set out in SUP 16 Annex 47AR (page 54 of the Directory PS).

6.1.2 Why was there a field related to accredited bodies in the PS and not in the CP?

We received significant feedback to our proposals requesting an additional field for membership of Accredited Bodies.

6.1.3 How long will directory persons data be held historically on the FS Register? (The FCA register goes back several years, e.g. 2000/2001 records can be seen)

We intend that it will remain published forever, as the data retention policy is not systematically linked to the firm or individual data we hold. However, there may be exceptions to this, where we agree to remove information from the FS Register.

6.1.4 Why is there no requirement for individuals to give their consent when we submit their personal data as part of the directory persons submissions?

Data protection legislation requires us to have a valid lawful basis under Article 6 of the GDPR in order to process personal data. Consent is only one of the lawful bases that may be relied on. Another is the public interest basis under Article 6(1)(e) of the GDPR, which permits us to process personal data (in this case, publish directory persons' information) if it is necessary for the performance of a task in the public interest. Under section 8(c) of the DPA 2018, this includes the exercise of a public function - in this case, our supervisory function and publishing the information as part of the record we are required to maintain under s.347 FSMA. Therefore, we do not rely on consent for the processing of directory persons data.

For more information please read our privacy notice which explains how and why we use your personal data. Additionally, our Policy Statement (PS19/7) has useful background and information for preparing your submission.

6.1.5 Why was the benchmarking submission administration function deleted from the FCA's Handbook without consultation?

We consulted on the deletion of this function in CP17/17 'Handbook changes to reflect the application of the EU Benchmarks Regulation'.

6.1.6 The title prefix is a mandatory field in your Directory Person forms. What should we do if we don't have title information?

From 2 March 2020, the title prefix is an optional field in all of our Directory Persons forms.

6.2 Administration

6.2.1 The declaration page suggests that you must print, sign and retain a copy of the submitted forms. How should this be managed?

In the final version of the declaration, firms will not be required to print or sign the forms. This text is standard across all Connect forms but is not required for the Directory Persons form because it is automatically retained in Connect. We have clarified this in the new user guide for firms, which we have published on our directory persons web page.

6.2.2 On the declaration page, who should be the signatory/authoriser?

The authorised signatory is the individual responsible for submitting the form. However, ultimate responsibility lies with the individual responsible for the firm's compliance with the certification regime. So, they will need to ensure appropriate governance processes and delegation procedures.

6.2.3 How will the bulk assignment of IRNs for new individuals be communicated to firms?

Once we have processed your bulk submission, you will be able to see the status of all individuals for which you submitted data in the feedback file.

The feedback file will set out which individuals have been processed as part of the submission, along with the IRNs for any new individuals.

The feedback file will also have 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.

6.2.4 What are the implications of data not being updated within 7 days of changing?

The Directory Policy Statement, states that a £250 admin fee will be enforced where data is incorrect and has been identified by external users

via a complaint.

6.2.5 Can firms view their data as soon as it has been uploaded?

Firms will be able to view their data as soon as it has been uploaded, regardless of whether the FCA has processed the submission.

6.2.6 For Material Risk Takers (MRTs), the Directory Policy Statement stipulates that where a firm identifies a member of staff under the quantitative criteria alone and they have assessed using objective criteria that their duties and authorities do not materially impact an institution's risk profile, they may notify or apply to the FCA or PRA to exclude these individuals from identification. How should the FCA/PRA be notified of this?

If you would like to make the FCA aware of the need to exclude an MRT, please see guidance on the FCA's approach to the identification and exclusion of material risk takers set out in FG17/5.

6.2.7 How on the system do firms notify the FCA that the data is still correct? (the PS states firms must do this within every 12 months)

Firms will receive several email reminders to login to the system to click an attestation button in Connect. Help on how to do this will be given in supplementary guidance materials.

6.2.8 I've submitted dummy test data since you started processing data on 29 November 2019 or accidentally added individuals I shouldn't have. How can I remove these submissions?

Please do not submit any dummy test data. All data is now being processed and will be published. If you have submitted dummy test data or added individuals in error, after 29 November 2019, please contact our Contact Centre as soon as possible so they can delete this.

6.3 Directory Persons Data

6.3.1 How will sanctions be managed?

Sanctions data will be added by us. No action is required by firms.

6.3.2   If neither an individual's National Insurance number (NI) nor their passport number is available, what is the impact on the firm's notification?

Firms will be unable to notify us of a directory person if they have neither NI, nor passport number. There are no exceptions to this.

According to the directory persons rules, firms should provide a National Insurance (NI) number where the individual holds one. Firms will only need to give us passport numbers if:

    a. directory persons do not hold a National Insurance (NI) number

    b. they have previously only provided us with a passport number for directory persons, so we need it to correctly match the records

6.3.3   For a small selection of our Directory Persons, we don't have a UK national insurance number (NINO) or passport number. What action should we take?

We are expecting this to be an extremely rare scenario. In exceptional cases where this arises, you may apply for a waiver, if you have exhausted all possible means of obtaining this information. In making such a request, we would expect you to supply full alternative identification verification undertaken as part of the certification. We would also expect a thorough explanation as to why it is impossible to supply either a NINO or passport number.

6.3.4   Is it important that passport numbers are updated?

Like any other reporting requirement, if firms provided us with a passport number and this has changed, firms will need to update this information within 7 business days.

6.3.5   Back office staff do not want their details made public. How can we respond to this?

This data enables us, other regulators, law enforcement and other intelligence partners to better track and monitor individuals operating in the industry. It will enable us to track and apply appropriate interventions. The information will help firms to do quick reference checks of people they are recruiting. It will also help firms to effectively find and verify the identity of potential counterparties.

6.3.6   Will firms need to clean their data before submission?

Yes, firms will need to clean their data before submission. The Policy Statement says we will not verify the information about directory persons which is reported by the firm. If a firm becomes aware of any inaccuracies or errors in the information reported about a directory person it must rectify that information as soon as possible, in line with applicable data protection legislation (SUP 16.26.8(4)).

6.3.7   If a firm perceives a customer facing employee to be vulnerable, and they don't want to make a postcode or other information public, what should they do?

The option to provide workplace location will only show if 'face-to-face' is selected as the customer engagement method. Where an individual has a legitimate reason for not wanting a workplace location to be made public, the location details can be omitted. Please refer to the Policy Statement for more information on the circumstances in which this can happen. It should be noted that the FS Register will only publish location information to the town level, rather than display postcode.

6.3.8   If someone goes to work for another firm and have changed their passport number, their records won't match. Which firm will be responsible for obtaining the passport number? The previous firm or the firm that the individual currently works for?

The new firm will be responsible for checking the accuracy of their data. Previous records can match via the IRN number, DOB and then the NI Number or passport number. If the NI number is present, the record will match. If the NI number is not present, and the record is not matched by the passport number, the firm can either call the Contact Centre to update the passport number for the individual and then send the notification, or the firm can provide the old passport number if they have been able to obtain it, send the notification, and then update the passport information using the amend form.

6.3.9 What should firms do if their employees do not provide them with accurate information? (e.g. passport number or accreditation)

Where the error is due to an employee withholding information or knowingly supplying incorrect information, it may be reasonable for the firm to instigate a disciplinary, particularly when considering individual Conduct Rule 3 'You must be open and cooperative with the FCA, the PRA and other regulators'. If a firm can't provide data, then the individual can't hold the role, even if they have already been in that role.

6.3.10   Some of our directory persons do not have UK national insurance numbers (NINO). For these individuals, we have a passport number but their nationality is not listed in your pre-defined dropdown list. What should we do?

All our forms use a standard pre-defined list. We are looking at options to address this. For options not listed please let our Contact Centre know so we can track these cases to determine the best course of action.

6.3.11 From what date should firms start reporting directory persons, and how far should they backdate role start dates?

Dual Regulated Deposit takers and PRA designated investment firms (banking firms) – SM&CR regime started March 7th, 2016

Mandatory for these firms to report to us individuals who are directory persons on or after 9th September 2019. However, if the information is available, firms should also report to us individuals who were directory persons from 10th December 2018 to 9th September 2019, even if those individuals were no longer directory persons on 9th September 2019.

For role start dates for this population, these cannot be earlier than 7th March 2016.

Dual Regulated Insurers – SM&CR Regime started 10th December 2018 Mandatory for these firms to report to us individuals who are directory persons on or after 9th September 2019. However, if the information is available, firms should also report to us individuals who were directory persons from 10th December 2018 to 9th September 2019, even if those individuals were no longer directory persons on 9th September 2019.

For role start dates for this population, these cannot be earlier than 10th December 2018

Solo regulated Firms – SM&CR Regime started 9th December 2019

Mandatory for these firms to report to us individuals who are directory persons on or after 9th December 2019.

For role start dates for this population, these cannot be earlier than 9th December 2019.

6.3.12 We are slightly confused about which historical data should be in scope of the Directory Persons data collection exercise. Are you able to add some scenarios to help with this?

Please refer to the following scenarios:

Scenario 1:

- Jim worked for a bank.

- Jim was an Approved Person until 6 March 2016.

- On 7 March 2016 SM&CR started for banks, and Jim was not a senior manager, so his status on the FS Register changed to 'inactive'.

- On 10 March 2016, despite having a year to do so, Jim's firm certified him as being fit and proper to carry out the relevant certification function.

- On 12 January 2019, Jim left the firm having continued to be certified as a Directory Person up until that time.

Directory person submission for Jim (scenario 1)

- ✓ If Jim's firm have the data available, Jim should be submitted, because he was a certified person on and after 10 December 2018. We are asking firms to include people who were certified persons from 10 December 2018, only if they have this historical data available. It is only mandatory to submit data for people who held certified roles at the firm on or after 9 September 2019.

- ✓ For Jim's role start date, the firm would add 10 March 2016 as this was the date Jim was certified to do the role from.

- ✓ For Jim's role end date, the firm would add 12 January 2019, as this is the date Jim stopped being certified by the firm.

Scenario 2:

- As scenario 1, but Jim either left the firm before 10 December 2018, or was no longer a certified person on 10 December 2018.

Directory person submission for Jim (scenario 2)

- ✓ Jim's data should not be submitted as a Directory Person, because he was not a certified person on or after 10 December 2018.

Scenario 3:

- As scenario 1, but Jim did not stop being a certified person on 12 January 2019. He continued in the same role at the firm and left the firm on 15 September 2019, having continued to be certified up until that time.

Directory person submission for Jim (scenario 3)

- ✓ Because Jim was a certified Directory Person on or after 9 September 2019, the firm must submit data for Jim as a certified person, providing a start date of 10 March 2016 and end date of 15 September 2019.

Scenario 4:

- Helen works for an insurer.

- Helen was an Approved Person until 9 December 2018

- On 10 December 2018 SM&C started for insurers, and Helen was not a senior manager, so her status on the FS Register changed to 'inactive'.

- On 15 Feb 2019, Helen's firm certified her as being fit and proper to carry out the relevant certification function.

- From 15 Feb 2019 to 15 May 2019, Helen was certified to do role X, then from 16 May 2019 to current day, Helen has been certified to do role Y.

Directory person submission for Helen (scenario 4)

✓ Helen's data must be submitted as a Directory Person for role Y, because she was a certified person in this role on or after 9 September 2019. If the information is available, Helen's information should be submitted for role X as she held this role as a certified person on or after 10 December 2018.

✓ For role X, the firm should add 15 February 2019 as the start date and 15 May 2019 end date.

✓ For role Y, the firm should add 16 May 2019 as the start date and leave the end date field blank.

6.3.13 The SM&CR for Dual Regulated Deposit takers and PRA designated investment firms (banking firms) started on March 7th, 2016, but there is only a requirement for firms to backdate to 10 December 2018 (if they have the information), won't there be a gap in information?

Yes, there will be a gap in this information. We have to balance completeness of information with the burden on firms to provide this information.

6.3.14 Should information about customer facing trainees be included as directory persons information?

No, only once they have been certified.

6.3.15 Is the onus on firms to check that employees' accreditations are active? How should they verify this?

It is the firm's responsibility to ensure that individuals carrying out customer engagement roles requiring qualification, are active members of any of the 6 FCA-recognised accredited bodies, before providing this

information to us. It is for the firm to decide how best to verify information.

6.3.16 When backdating to December 2018, is the firm required to retrieve employees historical IRN?

Yes, if they have that information available.

6.3.17 The Policy Statement switches between accredited body and professional accreditations. This is confusing for firms. What steps will the FCA take to make it clearer?

The FCA will be clarifying this by using communications, user guides and help text in Connect forms.

6.3.18 Why is there a requirement to collect accreditation information?

We are asking firms to provide us with information about memberships of any of the 6 FCA-recognised accredited bodies, for individuals carrying out a customer engagement role that requires a qualification.

We are collecting information which will benefit consumers and help them to be better informed. We received feedback that this would be very useful information for consumers.

6.3.19 Is it only accreditations related to the individuals' current role which need to be submitted?

Memberships are not associated with the nature of the role. If an individual is carrying out a customer engagement role and is a member of one or more of the 6 FCA-recognised Accredited Bodies, then firms should provide this membership information regardless of whether it is related to their current role.

6.3.20 Are accreditations only required to be added for customer facing roles?

Yes, information about memberships of any of the 6 FCA-recognised Accredited Bodies is only required for individuals carrying out a customer engagement role that requires a qualification.

6.3.21   What should firms do about certifications, if individuals go on long periods of leave?

This is for the firm to decide. If a firm de-certifies an employee when they go on leave and then re-certifies that person once they return to work, this should be reflected.

6.3.22   How should firms interpret 'accredited' - they qualified from that institution, or continue to pay to be accredited as a member?

Individuals should be an active member of the FCA-recognised accredited body.

6.3.23   We have several Directory Persons who are in roles requiring qualification but who do not engage with customers. In the Directory Persons forms, the customer engagement value is mandatory where a qualification role is entered. How should we proceed?

From 2 March 2020, customer engagement method will be optional for role '[FCA CF] (5) Functions requiring qualifications'. However, customer engagement method will still be mandatory for following two roles - 'Sole

trader dealing with clients for which they require qualification' and 'Appointed representative dealing with clients for which they require qualification'.

6.3.24   Regarding previous name, your guidance suggests "If the Directory Person was previously known by a different name other than that which currently appears on their passport or National Insurance card, then please put this name here". How far back in time do you need this requirement to cover (e.g. whilst held role with our firm, since SM&CR started, all previous names held as an adult) and if they have more than one previous name how should we add this, as only one previous name can be added to the Multiple Add form?

Firms should provide all previous names known to the firm. If there is more than one previous name, please use the single notification form to add this data as this form accepts multiple previous names.

6.3.25   I want to submit a directory person whose name includes an apostrophe, e.g. John O'Neil. The single notification form does not

allow apostrophes. How should I proceed?

We are aware of this issue and are asking firms to use the Multiple Add template until we have established whether we can fix this.

6.4 Data submission

6.4.1   In the multiple add template, how do we input the data for multiple individuals that work for multiple entities?

If you need to add individuals who work at different legal entities, you will need to complete more than one directory persons application form. This is because each multiple add template can only contain individuals from one firm (FRN).

6.4.2   In the multiple add template, how can firms show that individuals have left a role between December 2018 and March 2020?

The FCA will be adding 'role end date' columns to the multiple add template.

6.4.3   Should the fields in the Policy Statement match the field names in the multiple add template?

We will ensure the field names are aligned in the final version of the Multiple Add template

6.4.4   Under which customer engagement category should video conferencing fall?

This should be categorised as 'online'. We will be clarifying this in the guide.

6.4.5   Does workplace location only show if 'face-to-face' is selected as a customer engagement method?

Yes, this is correct.

6.4.6   What postcode do we use for advisers at telephony sites, their exact call centre, or the main head office? It may confuse consumers if telephony sites are added, as they cannot physically see the adviser at this location.

In this example, the user would select 'telephone' rather than 'face-to-face' as the engagement method, so they would not be required to add a post code.

6.4.7   Do you have plans for a 'Multiple Amend' functionality?

Multiple Amend template is being introduced from February 2020. Instructions on how to use this can be found in the Multiple Amend guide.

6.4.8 If a directory person is a non-executive director (NED) with no certification, how do we record this?

In Connect, when selecting a role type, firms can select 'Director of a firm who is not a certification employee or a SMF manager'.

6.5 Reporting

6.5.1 Will there be a multiple export facility to allow firms to cross-check their data periodically, e.g. against HR records, for accuracy?

We are currently working with our technical teams to see whether it is possible to generate this from Connect

6.5.2 Will firms have a multiple API download facility?

There isn't a facility for a multiple download of directory persons data. An API facility to systematically access directory persons Data will be available from March / April 2020. But this will not be a bulk download API service. For Existing Register Data, there is a beta API service that users can sign up to here: https://register.fcs.org.uk/Developer/ This is a beta (test) service and there are some browser compatibility issues, so we recommend using Chrome. This gives the user access to the Developer Portal with the documentation on the APIs plus the ability to create a key to access the APIs. The directory persons data APIs will be added to this service next year. Any service or technical queries should be sent to the support team on registerapisupport@fca.org.uk.

6.5.3 Could an API be developed to reduce the operational risk for firms introduced by manual spreadsheet entry?

There are no plans to receive directory persons Data via an API.

6.6 Publishing directory persons information

6.6.1 How will the FCA ensure that no confusion is caused for users viewing December 2018 as the role start date for most individuals working at dual- regulated deposit takers and PRA designated investment firms (banking firms), when those individuals may have been fulfilling that function for years?

Our rules clearly state that firms will be providing the actual role start date (no earlier than 7th March 2016) and not the directory start date (Dec 2018). So, this problem should not arise.

6.6.2 How will the FCA ensure that no confusion is caused by the 'gap' in directory information for many individuals between the March 2016 end of the Register data and the December 2018 start of the directory data?

This potential 'information gap' will be communicated to consumers. They will be told to check the relevant certification sites where they can find historical membership information.

6.6.3 How will the FCA ensure that accreditations are clearly marked as only showing for individuals performing customer facing roles which require qualifications?

Firms should provide information about memberships of any of the 6 FCA- recognised Accredited Bodies, not accreditations. But this is only for customer engagement roles requiring qualification.

We have included explanatory text in the multiple add template to make it clear we are asking for information on memberships rather than accreditations and only for customer engagement roles requiring qualification. This will be reflected on the final Connect form.

6.6.4 Will multiple locations assigned to a customer facing employee (selecting 'face-to-face' engagement type), confuse consumers?

If a directory person works in multiple locations, they should be available to serve consumers at each of those locations. When a consumer searches for an individual within a defined radius, the directory person should be listed in the results and be available for a face-to-face meeting in that location, despite working elsewhere during other times of the week

6.7 Error message glossary

Table below contains frequently asked error messages for multiple directory person form submission:

Category	Error message	Error description and how to resolve
Information mismatch error	IRN mismatch error: Our IRN record does not match with what you have submitted	This error will occur when an IRN has been provided, but some of the personal information provided in the spreadsheet does not match our records. Please make sure that all the information provided such as - date of birth, national insurance number, passport and nationality matches the information that we hold in our records. If the problem persists, try submitting this record via the single notification form.
Information mismatch error	Surname mismatch error: Surname provided does not match our record	When an IRN has been provided, surname should match our records. If there is a mismatch then this error message will be generated. Please make sure that the information provided matches our records. If the problem persists, try submitting this record via single notification form.
Formatting error	Title is defined by a range of values. Please select from dropdown	Please select title from the drop-down list that is provided in the template. Note - list is case sensitive. For example, putting MR instead of Mr. will result in this error message.
File validation error	Columns missing or file is corrupted. Please do not modify the csv file once converted from xlsx	This error is displayed when the whole file is rejected by the system. Please make sure that you don't change the file after converting it into .CSV. Another reason for this error is when a user submits a multiple add template for an amend notification and vice-versa.
File validation error	Unsupported file format; Please submit file in CSV UTF-8 format	Please submit the file in the UTF-8 CSV format only.
File validation error	Date format is incorrect. It should be dd/mm/yyyy and the number format for all cells with date populated should be 'Date'	System only accepts date in dd/mm/yyyy format, example 01/01/1980. Please make sure that the date provided is in the specified date format. You can verify it by clicking on the date cell and view the value that is displayed under home tab -> number format. If the value displayed there is anything other than 'date', example 'General', then it will also result in this error message.
Duplicate value error	Duplicate individual	Please use the single notification form to submit this record as the system is unable to identify a unique record in the database and

Category	Error message	Error description and how to resolve
		therefore unable to process record.
Duplicate value error	Individual already holds [Role Name]	A firm can only submit a new role for an individual when the same role previously submitted by the firm has ended. For example, if a DP holds client dealing role with a start date of 03/06/2020 and no end date, then the firm cannot submit a notification for the same individual without first end dating the current role.
Duplicate value error	Duplicate Role records present for individual	This error will result due to the same role being provided more than once for the same individual in the same notification form. Please use a separate notification form to record gaps in employment. For example, if a Directory Person individual held [FCA CF] (5) Functions requiring qualifications role from 01/01/2020-02/02/2020 and then again from 04/04/2020 to present, then first submit an add notification with the historical role, i.e. for the period of 01/01/2020-02/02/2020 and once that is processed successfully, please submit another notification for the
Data validation error	Individual Failed	Please use the single notification form to submit this record as the system is unable to process this record via the multiple add

Below table contains all error messages that a firm can receive when submitting multiple directory person form:

Category	Error message	Error description and how to resolve
Mandatory field error	FRN cannot be blank	FRN is a mandatory field. Please provide FRN for each individual record that you are submitting.
Mandatory field error	Start date cannot be blank for the [Role Name]	Start date is mandatory where a role has been submitted. Please provide start date.
Mandatory field error	At least one role is mandatory	Please provide at least one role when submitting a Directory Person
Mandatory field error	First name(s) cannot be blank	First name(s) is a mandatory field and must be provided.
Mandatory field error	Last name cannot be blank	Last name is a mandatory field and must be provided.
Mandatory field error	Date of birth cannot be blank	Date of birth is a mandatory field and must be provided.

Category	Error message	Error description and how to resolve
Mandatory field error	Please provide Passport number if Nationality present in Record	Passport number becomes a mandatory field if Nationality has been provided. Please either provide passport number or remove nationality if NI number has also been provided.
Mandatory field error	Please provide NI number, or where the individual does not have one, their Passport number and	Either NI or a combination of passport and nationality is mandatory. This error will result when none of these values are provided for a Directory Person record.
Information mismatch error	IRN mismatch error: Our IRN record does not match with what you have submitted	This error will occur when an IRN has been provided, but some of the personal information provided in the spreadsheet does not match our records. Please make sure that all the information provided such as - date of birth, national insurance number, passport and nationality matches the information that we hold in our records. If the problem persists, try submitting this record via the single notification form.
Information mismatch error	Surname mismatch error: Surname provided does not match our record	When an IRN has been provided, surname should match our records. If there is a mismatch then this error message will be generated. Please make sure that the information provided matches our records. If the problem persists, try submitting this record via single notification form.
Information mismatch error	Personal Information mismatch error: One or more of the following information does not match our records; Date of birth; National Insurance (NI) number; Passport or Nationality	When an IRN has been provided, other details such as date of birth and National Insurance number/Passport number + Nationality must match our records. If there is a mismatch then this error message will be generated. Please make sure that the information provided matches our records. If the problem persists, try submitting via single notification
Formatting error	Title is defined by a range of values. Please select from dropdown	Please select title from the drop-down list that is provided in the template. Note - list is case sensitive. For example, putting MR instead of Mr. will result in this error message.
Formatting error	Roles should be defined by a range of values. Please select from dropdown	Please select role from the drop-down list that is provided in the template. Note - list is case sensitive.
Formatting error	NI Number format is wrong	The format of the National Insurance number is two prefix letters, six digits and one suffix letter. An example is AB123456C. Please make sure that NI number submitted is in

Category	Error message	Error description and how to resolve
Formatting error	Date of birth format is wrong. It should be in dd/mm/yyyy format	System only accepts date in dd/mm/yyyy format, example 01/01/1980. Please make sure that the date provided is in the specified date format.
Formatting error	Date format is wrong. It should be in dd/mm/yyyy format	System only accepts date in dd/mm/yyyy format, example 01/01/2020. Please make sure that the date provided is in the specified date format.
Formatting error	IRN format is wrong	The format of the IRN is three prefix letters and five digits. An example is ABC12345. Please make sure that IRN submitted is in this
Formatting error	Nationality should be defined by a range of values. Please select from dropdown	Please select Nationality from the drop-down list that is provided in the template. Note - list is case sensitive.
Formatting error	Please declare Customer Engagement method. Please select from dropdown	Please select customer engagement method from the drop-down list that is provided in the template. Note - list is case sensitive.
Formatting error	Activity-should be defined by a range of values. Please select from	Please select activity from the drop-down list that is provided in the template. Note - list is case sensitive.
Formatting error	Accreditation-should be defined by a range of values. Please select from dropdown	Please select accreditation from the drop-down list that is provided in the template. Note - list is case sensitive.
Formatting error	Role end date format is wrong. It should be in dd/mm/ yyyy format	System only accepts date in dd/mm/yyyy format, example 01/01/2020. Please make sure that the date provided is in the specified date format.
File validation error	Columns missing or file is corrupted. Please do not modify the csv file once converted from xlsx	This error is displayed when the whole file is rejected by the system. Please make sure that you don't change the file after converting it into .CSV. Another reason for this error is when a user submits a multiple add template for an amend notification and
File validation error	Unsupported file format; Please submit file in CSV UTF-	Please submit the file in the UTF-8 CSV format only.
File validation error	Date format is incorrect. It should be dd/mm/yyyy and the number format for all cells with date populated should be 'Date'	System only accepts date in dd/mm/yyyy format, example 01/01/1980. Please make sure that the date provided is in the specified date format. You can verify it by clicking on the date cell and view the value that is displayed under home tab -> number format. If the value displayed there is anything other than 'date', example 'General', then it will also result in this error
Duplicate value error	Duplicate individual	Please use the single notification form to submit this record as the system is unable to identify a unique record in the database and therefore unable to process

Category	Error message	Error description and how to resolve
Duplicate value error	Individual already holds [Role Name]	A firm can only submit a new role for an individual when the same role previously submitted by the firm has ended. For example, if a DP holds client dealing role with a start date of 03/06/2020 and no end date, then the firm cannot submit a notification for the same individual without first end dating the current role.
Duplicate value error	Duplicate Individual: NI number already present in Excel Sheet	If the same NI number has been provided for more than one record in the same spreadsheet, then it will result in this error message. If there is more than one entry of the same individual with the same NI in the same spreadsheet, then it will also result in
Duplicate value error	Duplicate Role records present for individual	This error will result due to the same role being provided more than once for the same individual in the same notification form. Please use a separate notification form to record gaps in employment. For example, if a Directory Person individual held [FCA CF] (5) Functions requiring qualifications role from 01/01/2020-02/02/2020 and then again from 04/04/2020 to present, then first submit an add notification with the historical role, i.e. for the period of 01/01/2020-02/02/2020 and once that is processed successfully, please submit another notification for the current time
Duplicate value error	Duplicate Individual: Passport number already present in Excel Sheet	If the same passport number has been provided for more than one record in the same spreadsheet, then it will result in this error message. If there is more than one entry of the same individual with the same passport number in the same spreadsheet then it will also result in this error message.
Duplicate value error	Duplicate Activity records present for individual	This error is due to an individual already having this activity on record.
Duplicate value error	Duplicate Accreditation records present for individual	This error is due to an individual already having this accreditation. Please remove this accreditation and submit again.
Duplicate value error	Duplicate Post Code present for individual;	This error is due to same workplace location provided more than once for the same individual.

Category	Error message	Error description and how to resolve
Data validation error	FRN should be same as Parent organisation	The same FRN should be entered in the spreadsheet that has been selected by the CONNECT user when they select Directory Person form. Please submit a separate notification for each associated entity. Submitting Directory Person data for more than one FRN in the same spreadsheet will also result in this error.
Data validation error	Activity cannot be blank for [Role Name]	Activity is mandatory for the following roles: -Functions requiring qualification -Sole trader dealing with clients for which they require qualification -Appointed representative dealing with clients for which they require qualification
Data validation error	Date started role for [Role Name] : You have selected a date that is earlier than the commencement of the certification regime for your type of firm	Dual Regulated Deposit takers and PRA designated investment firms (banking firms) – SM&CR regime started 7th March 2016 For role start dates for this population, these cannot be earlier than 7th March 2016. Dual Regulated Insurers – SM&CR Regime started 10th December 2018 For role start dates for this population, these cannot be earlier than 10th December 2018 Solo regulated Firms – SM&CR Regime started 9th December 2019 For role start dates for this population, these cannot be earlier than 9th December 2019.
Data validation error	Customer engagement cannot be blank for the [Role Name]	Customer engagement method is mandatory for the following roles: - Sole trader dealing with clients for which they require qualification - Appointed representative dealing with clients for which they require qualification
Data validation error	Individual Failed	Please use the single notification form to submit this record as the system is unable to process this record via the multiple add
Data validation error	This individual cannot be processed using the bulk upload facility; for this individual please submit a single Directory Person Notification form	Please use the single notification form to submit this record as the system is unable to process this record via the multiple add template.

Category	Error message	Error description and how to resolve
Data validation error	First name(s) cannot be more than 80 characters	There is a limit of 80 characters for this field. Please make sure that the value provided does not exceed this limit.
Data validation error	Commonly used name(s) cannot be more than 80	There is a limit of 80 characters for this field. Please make sure that the value provided does not exceed this limit.
Data validation error	Previous First name(s) cannot be more than 80	There is a limit of 80 characters for this field. Please make sure that the value provided does not exceed this limit.
Data validation error	Previous Last name cannot be more than 80 characters	There is a limit of 80 characters for this field. Please make sure that the value provided does not exceed this limit.
Data validation error	Last name cannot be more than 80 characters	There is a limit of 80 characters for this field. Please make sure that the value provided does not exceed this limit.
Data validation error	Age should be equal or greater than 16 years	The minimum age of directory person is 16 years.
Data validation error	Role end date cannot be before Role start date	Role end date should be greater than the role start date. For example, if a role start date is 03/06/2020 then the earliest role end date could be 04/06/2020.
Data validation error	Post code should be proper format of: [Postcode] is wrong	Please only provide postcode and not the full address. There is a limit of 8 characters for this field. Ensure there are no white spaces **after** the postcode.
Data validation error	You have selected a date that is more than 3 months in the future. You cannot make this change now.	The start date of a role can only by up to 3 months from the current date. Please submit the role/record when there are 3 months or less until the role start date.
Data validation error	When Role which holds Customer Engagement as face to face is not active user cannot add workplace location	You can add workplace location only if any active role holds Customer Engagement method as Face-to-Face.
Duplicate value error	Duplicate Individual: IRN already present in Excel Sheet	Only one entry per individual should be added in Amend file. Please do not add multiple entry for single individual.
Data validation error	For applied role user cannot hold any activities /workplace/accreditations	User can only add activities, workplace, and accreditation for specific roles.

FINANCIAL CONDUCT AUTHORITY

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