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FINAL NOTICE

To: **FIRST MONEY SERVICES LTD**

Address: **2 Kings Cross Lane, Redhill, RH1 5NU**

FRN: **921422**

Dated: **22 December 2025**

ACTION

1. For the reasons set out in this Final Notice, the Authority hereby cancels First Money Services Ltd's ("the Firm") registration as a Small Payment Institution under the Payment Services Regulations 2017 ("the PSRs").
2. The Authority issued to the Firm the Decision Notice, which notified it that for the reasons given in this notice and pursuant to regulation 10(1)(a), 10(1)(e) and 10(1)(h) of the PSRs, the Authority had decided to take the action specified above.
3. The Firm has not referred the matter to the Tribunal within 28 days of the date on which the Decision Notice was issued to it.
4. Accordingly, the Authority has today cancelled the Firm's registration. The cancellation takes effect from the date of this Final Notice.

SUMMARY OF REASONS

5. The Firm:
 - a. did not provide payment services within 12 months of becoming registered;
 - b. is no longer meeting the conditions for registration as an SPI under the PSRs. In particular, the Firm has failed to comply with a requirement of The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 ("the MLRs") to be included in a register maintained under the MLRs; and
 - c. has reported providing payment services after its registration with HMRC ended.
6. The cancellation action set out in paragraph 1 above has been imposed in order to advance the Authority's consumer protection and integrity objectives (sections 1C and 1D of the Act).

DEFINITIONS

7. The definitions below are used in this Final Notice (and in the Annex):

"the Act" means the Financial Services and Markets Act 2000;

"the Authority" means the Financial Conduct Authority;

"the Decision Notice" means the Decision Notice given to the Firm on 18 November 2025;

"the Firm" means First Money Services Ltd;

"the Handbook" means the Authority's Handbook of rules and guidance;

"HMRC" means His Majesty's Revenue and Customs;

"the PSRs" means the Payment Services Regulations 2017;

"the MLRs" means Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017;

"Return" means annual regulatory report submitted by an SPI to the Authority using form FSA057;

"SPI" means "Small Payment Institution" as defined in Regulation 2(1) of the PSRs; and

"the Tribunal" means the Upper Tribunal (Tax and Chancery Chamber).

RELEVANT STATUTORY PROVISIONS

8. The statutory and regulatory provisions relevant to this Final Notice are set out in the Annex.

FACTS AND MATTERS

9. The Firm was registered by the Authority as an SPI on 28 September 2020.
10. The Firm is required by rules made by the Authority under the PSRs to report certain information to the Authority, by way of Return, on an annual basis. The Return includes details of the payment services provided by the SPI in the preceding year.
11. The Firm submitted a Return (covering the period 1 January to 31 December) for each of the years 2020, 2021 and 2022. In each Return, it reported having undertaken no payment transactions, nor any other business. This is consistent with its filed accounts at Companies House which show it to have been dormant from 1 February 2020 to 31 January 2023.
12. As a condition of its registration, the Firm is also required to comply with a requirement of the MLRs to be included in a register maintained under the MLRs. As the Firm is registered to carry out money remittance services only, the Firm is required to be included in a register maintained by HMRC.
13. The Firm's registration with HMRC under the MLRs ended on 12 March 2022.
14. On 29 January 2024, the Firm submitted a Return for the period 1 January to 31 December 2023. In that Return, the Firm reported carrying out payment transactions. The reported payment transactions would have been carried out after the Firm's registration with HMRC had ended and would have therefore been provided whilst the Firm was not meeting the conditions for registration.
15. On 30 September 2024, following communication from the Authority in relation to the payment transaction reported (without HMRC registration) in the Return submitted on 29 January 2024, the Firm stated that it had not provided any payment services and that the Return submitted showing payment transactions was completed incorrectly. The Firm stated that it was taking steps to rectify the Returns and ensure future submissions are in line with the Authority's requirements.
16. On 22 January 2025, the Firm submitted a Return for the period 1 January to 31 December 2024. In that Return, the Firm again reported carrying out payment transactions. The reported payment transactions would have been carried out after the Firm's registration with HMRC had ended and would have therefore been provided whilst the Firm was not meeting the conditions for registration.
17. On 17 February 2025, following further communication from the Authority in relation to the payment transactions reported (without HMRC registration) in the Return submitted on 22 January 2025, the Firm stated that this was a mistake and that the Return would be updated. The Firm also confirmed that it was still not registered with HMRC.
18. On 21 April 2025 the Firm signed a voluntary undertaking agreeing to not provide any payment services until it had obtained HMRC registration.
19. To date, the Firm has not secured registration with HMRC, as is required under the MLRs. Additionally, the Firm has not satisfied the Authority that it has not provided any payment services after its registration with HMRC ended on 12 March 2022.

FAILINGS

20. The Authority has concluded that, on the basis of the facts and matters described above:

- (a) the Firm did not provide payment services within 12 months beginning with the date on which the registration took effect. This provides a basis for cancelling the Firm's registration in accordance with Regulation 10(1)(a) (as applied by Regulation 15) of the PSRs;
- (b) the Firm has not been included on a register maintained under the MLRs, as is required by regulation 14(11) of the PSRs, since its registration with HMRC ended on 12 March 2022. This provides a basis for cancelling the Firm's registration in accordance with Regulation 10(1)(e) (as applied by Regulation 15) of the PSRs; and
- (c) cancellation is desirable in order to protect the interests of consumers, pursuant to regulation 10(1)(h) (as applied by regulation 15) of the PSRs. Particularly, as the Firm has not satisfied the Authority in relation to its position regarding the provision of payment services after it was no longer registered with HMRC.

23. For the reasons set out in this Notice, the Authority has cancelled the Firm's registration as an SPI, pursuant to regulation 10(1)(a), 10(1)e and 10(1)(h) of the PSRs.

PROCEDURAL MATTERS

24. This Final Notice is given to the Firm in accordance with section 390 of the Act (as applied by paragraph 10 of Schedule 6 of the PSRs).

Decision maker

25. The decision which gave rise to the obligation to give this Final Notice was made by an Authority staff member under the executive procedures.

Publicity

26. Sections 391(4), 391(6) and 391(7) of the Act (as applied by paragraph 10 of Schedule 6 of the PSRs) apply to the publication of information about the matter to which this Final Notice relates. Under those provisions, the Authority must publish such information about the matter to which this Final Notice relates as the Authority considers appropriate. The information may be published in such manner as the Authority considers appropriate. However, the Authority may not publish information if such information would, in the opinion of the Authority, be unfair to the Firm or prejudicial to the interests of consumers.

27. The Authority intends to publish such information about the matter to which this Final Notice relates as it considers appropriate.

Authority contact

28. For more information concerning this matter generally, the Firm should contact M Alexander Bajko at the Authority (direct line: 0207066 1838 / email: macieji.bajko@fca.org.uk).

Jeremy Parkinson
Enforcement and Market Oversight Division

ANNEX

RELEVANT STATUTORY PROVISIONS

1. The Authority's operational objectives established in section 1B(3) of the Act include protecting and enhancing the integrity of the UK financial system and securing an appropriate degree of protection for consumers.

The PSRs

2. Regulation 14(11) of the PSRs requires a small payment institution to comply with a requirement of the MLRs to be included in a register maintained under the MLRs where such a requirement applies to the firm. The register in which the Firm must be included under the Regulations is maintained by HMRC.
3. Regulation 15 of the PSRs provides:

"Regulations 7 to 12 apply to registration as a small payment institution as they apply to authorisation as a payment institution as if—

(a) references to authorisation were references to registration;

[...]."

4. Under Regulation 10(1)(a) (as applied by regulation 15) of the PSRs, the Authority may cancel the registration of an SPI where the firm does not provide payment services within 12 months beginning with the date on which the registration took effect.
5. Regulation 10(1)(e) (as applied by regulation 15) of the PSRs gives the Authority the power to cancel the registration of an SPI where the person no longer meets, or is unlikely to meet, any of the conditions set out in regulation 14(4) to (11) (conditions for registration as small payment institution).
6. Under Regulation 10(1)(h) (as applied by regulation 15) of the PSRs, the Authority may cancel the registration of an SPI where the cancellation is desirable in order to protect the interests of consumers.
7. Regulation 2 of the PSRs defines 'money remittance' as a service for the transmission of money (or any representation of monetary value), without any payment accounts being created in the name of the payer or the payee, where—
 - (a) funds are received from a payer for the sole purpose of transferring a corresponding amount to a payee or to another payment service provider acting on behalf of the payee; or
 - (b) funds are received on behalf of, and made available to, the payee;
8. Paragraph 1 of Part 1 of Schedule 1 to the PSRs provides that subject to the exclusions in Part 2 of Schedule 1 to the PSRs the following, when carried out as a regular occupation or business activity are payment services:

[...]

(f) money remittance.

[...].

The MLRs

9. Regulation 3(1) of the MLRs provides the following relevant definitions:

“the Commissioners” means the Commissioners for [HMRC];

“money service business” means an undertaking which by way of business operates a currency exchange office, transmits money (or any representation of monetary value) by any means or cashes cheques which are made payable to customers;”

10. Regulation 54(2) of the MLRs requires the Commissioners to maintain a register of relevant persons who are not included in a register maintained by the [Authority] under paragraph (1) and are:

[...]

b. money service businesses;

[...]

RELEVANT HANDBOOK PROVISIONS

11. In exercising its powers to cancel the registration of an SPI, the Authority must have regard to guidance published in the Handbook and in regulatory guides, such as ENFG. The main considerations relevant to the action stated in this notice are set out below.

Enforcement Guide

12. The Authority’s policy for the use of its enforcement powers under the PSRs is set out in Appendix 2 of the Enforcement Guide (“ENFG”), the relevant provision of which is summarised below.

13. ENFG App 2.2.2 G states that the Authority’s approach to the exercise of its powers under the PSRs is consistent with the use of powers under FSMA and the Authority’s general policy as explained in ENFG.

14. The statutory grounds for cancelling a firm’s Part 4A permission under Schedule 6A and s.55J of FSMA include where the firm has failed, during a period of at least 12 months, to carry on a regulated activity to which its Part 4A permission relates.