

---

## FINAL NOTICE

---

**To:** Leeds University Union

**Address:** University of Leeds, Woodhouse Lane, Leeds, West Yorkshire,  
LS2 9JT

**FRN:** 618918

**Dated:** 19 May 2026

### ACTION

1. For the reasons given in this Final Notice, the Authority hereby cancels Leeds University Union ("the Firm")'s Part 4A permission to carry on regulated activities.
2. The Authority issued to the Firm the Decision Notice, which notified it that for the reasons given in this notice and pursuant to section 55J of the Act, 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 Part 4A permission. The cancellation takes effect from the date of this Final Notice.

### SUMMARY OF REASONS

5. On the basis of the facts and matters set out in this Notice, it appears to the Authority that the Firm is failing to satisfy the Suitability Threshold Condition, in that the Firm is not a fit and proper person to conduct regulated activities having regard to all the circumstances. Specifically, the Firm has failed to be open and co-operative in all its dealings with the Authority as, despite repeated requests and warnings, the Firm has failed to submit its annual regulatory returns, namely the CCR007. As a result, the

Authority is not satisfied that the Firm's business is being, or will be, managed in such a way as to ensure that its affairs will be conducted in a sound and prudent manner.

6. The cancellation action set out at 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;

"COND" means the Threshold Conditions part of the Handbook;

"the Decision Notice" means the Decision Notice given to the Firm on 20 April 2026;

"the Firm" means Leeds University Union;

"the Firm's Part 4A permissions" means the permissions granted by the Authority to Firm pursuant to Part 4A of the Act;

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

"the Principles" or "PRIN" means the Authority's Principles for Businesses;

"RAG" means regulated activity group as referred to in SUP;

"the Returns" means the CCR007 Consumer Credit Data: Key Data for Credit Firms with Limited Permission returns for the periods between 1 August 2023 to 31 July 2025 which the Firm was due to submit to the Authority on various dates between 12 September 2024 and 12 September 2025;

"the Suitability Threshold Condition" means the threshold condition stated in Paragraph 2E of Schedule 6 to the Act;

"SUP" means the Authority's Supervision Manual, part of the Handbook;

"the Threshold Conditions" means the threshold conditions set out in Schedule 6 to the Act; and

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

## **RELEVANT STATUTORY AND REGULATORY PROVISIONS**

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

## **FACTS AND MATTERS**

9. The Firm was authorised by the Authority on 1 April 2014 and is permitted to conduct regulated consumer credit business:

- (a) agreeing to carry on a regulated activity;
- (b) debt adjusting;
- (c) debt-counselling; and
- (d) providing credit information services.

10. The Firm is required by SUP (and the further rules specified therein) to submit the Returns by the relevant due date. Despite repeated requests and reminders from the Authority between 25 July 2025 and 6 January 2026, the Firm has failed to submit the Returns.
11. The information contained in the Returns is essential to the Authority's assessment of whether the Firm is complying with the requirements and standards of the regulatory system and to the Authority's understanding of the Firm's business. The Firm's failure to submit the Returns places at risk the ability of the Authority to discharge its risk-based supervisory functions and to achieve the Authority's operational objectives, which include the protection of consumers and protecting and enhancing the integrity of the UK financial system.

### **FAILINGS**

12. From the facts and matters described above, the Authority, having regard to its operational objectives, which include protecting and enhancing the integrity of the UK financial system and the protection of consumers, has concluded that the Firm is failing to satisfy the Suitability Threshold Condition in that it:
- (a) has failed to comply with the rules set out in SUP that require it to submit the Returns to the Authority by the relevant due dates;
  - (b) has failed to respond appropriately to the Authority's repeated requests that it submit the Returns, and is therefore failing to comply with Principle 11 (which requires the Firm to deal with its regulators in an open and co-operative way);
  - (c) has failed to satisfy the Authority that it is ready, willing and organised to comply with the requirements and standards under the regulatory system, namely the requirements to submit regulatory returns to the Authority by the relevant due dates as set out in SUP;
  - (d) has therefore failed to satisfy the Authority that its business is being managed in such a way as to ensure that its affairs will be conducted in a sound and prudent manner or that it is a fit and proper person having regard to all the circumstances; and
  - (e) has failed to satisfy the Authority that it has complied with requirements imposed by the Authority in the exercise of its functions relating to the provision of information.
13. For the reasons set out in this Notice, the Authority has cancelled the Firm's Part 4A permission to carry on regulated activities.

### **PROCEDURAL MATTERS**

14. This Final Notice is given to the Firm under section 55Z of the Act and in accordance with section 390 of the Act.

15. The following paragraphs are important.

**Decision Maker**

16. The decision which gave rise to the obligation to give this Notice was made by an executive decision maker of the Authority.

**Publicity**

17. Sections 391(4), 391(6) and 391(7) of the Act apply to the publication of information about the matter to which this notice relates. Under those provisions, the Authority must publish such information about which this 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 publication would, in the opinion of the Authority, be unfair to the Firm or prejudicial to the interest of consumers or detrimental to the stability of the UK financial system.

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

**Authority Contacts**

19. For more information concerning this matter generally, the Firm should contact Rollo Quinault at the Authority (direct line: 020 7066 0253 or by email: [rollo.quinault@fca.org.uk](mailto:rollo.quinault@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.
2. Section 55J of the Act allows the Authority to cancel an authorised person's Part 4A permission, if it appears to the Authority that an authorised person is failing, or is likely to fail, to satisfy the Threshold Conditions (section 55J(1)(a)).
3. The Suitability Threshold Condition set out in Part 1B(2E) of Schedule 6 of the Act provides, in relation to a person ("A") carrying on or seeking to carry on regulated activities which do not consist of or include a PRA-regulated activity, that:

"A must be a fit and proper person having regard to all the circumstances, including –

[...]

(d) whether A has complied and is complying with requirements imposed by the FCA in the exercise of its functions, or requests made by the FCA, relating to the provision of information to the FCA and, where A has so complied or is so complying, the manner of that compliance;

[...]; and

(f) whether A's business is being ... managed in such a way as to ensure that its affairs will be conducted in a sound and prudent manner."

### **RELEVANT REGULATORY PROVISIONS**

4. In exercising its power to cancel a firm's Part 4A permissions, the Authority must have regard to the regulatory requirements and guidance published in the Handbook. The main considerations relevant to the action stated in this Final Notice are set out below.

#### **The Principles**

5. The relevant principles for businesses are set out in PRIN 2.1.1R.
6. Principle 11 (Relations with regulators) requires that a firm must deal with its regulators in an open and co-operative way, and must disclose to the Authority appropriately anything relating to the firm of which the Authority would reasonably expect notice.

#### **The Threshold Conditions**

7. COND gives guidance on the Threshold Conditions which represent the minimum statutory conditions for which the Authority is responsible, which a firm is required to satisfy, and continue to satisfy, in order to be given and to retain a Part 4A permission (COND 1.2.1G).

8. COND 1.2.3G reflects the statutory provisions of section 55J of the Act to the effect that the Authority may exercise its own-initiative powers to cancel an authorised person's Part 4A permission, if, among other things, a firm is failing to satisfy any of the Threshold Conditions, or is likely to fail to do so.

COND 2.5: Guidance on the suitability Threshold Condition

9. COND 2.5.1AUK(1) reproduces the relevant statutory provisions of Part 1B(2E) of Schedule 6 to the Act, that a person carrying on or seeking to carry on regulated activities must be a fit and proper person having regard to all the circumstances, including, amongst other things:
- a) the need to comply with requirements imposed by the Authority in the exercise of its functions, or requests made by the Authority, relating to the provision of information to the Authority, and where a person has so complied or is so complying, the manner of that compliance (COND 2.5.1AUK(1)(d)); and
  - b) the need to ensure that a person's business is being managed in such a way as to ensure that its affairs will be conducted in a sound and prudent manner (COND 2.5.1AUK(1)(f)).
10. COND 2.5.2G states that the Authority will take into consideration anything that could influence a firm's continuing ability to satisfy the Suitability Threshold Condition.
11. COND 2.5.6G gives examples of the kind of particular considerations to which the Authority may have regard when assessing whether a firm will satisfy, and continue to satisfy, the Suitability Threshold Condition including, but not limited to, whether:
- a) the firm has been open and co-operative in all its dealings with the Authority (see Principle 11 (Relations with regulators)) and is ready, willing and organised to comply with the requirements and standards under the regulatory system in addition to other legal, regulatory and professional obligations; the relevant requirements and standards will depend on the circumstances of each case, including the regulated activities which the firm has permission, or is seeking permission, to carry on (COND 2.5.6G(1));
  - b) the firm has contravened, amongst other things, any provisions of the Act or the regulatory system (which includes the threshold conditions, the Principles and other rules, the Statements of Principle and other rules, codes and guidance) (COND 2.5.6G(4)).

**The Supervision Manual**

Chapter 6B of SUP regarding cancellation of a firm's permission

12. The Authority's approach in relation to its enforcement powers is set out Chapter 6B of SUP, certain provisions of which are summarised below.
13. SUP 6B.1.1G(1) reflects the statutory provisions of section 55J of the Act to the effect that the Authority may use its own-initiative power to cancel an authorised person's Part 4A permission where, amongst other factors, the person is failing, or is likely to fail, to

satisfy the Threshold Conditions for which the Authority is responsible (SUP 6B.1.1G(1)), or it is desirable to exercise one or more of its operational objectives (SUP 6B.1.1G(3)).

14. SUP 6B.5.1G(1) states that the Authority will consider cancelling a firm's Part 4A permission using its own initiative powers contained in section 55J of the Act in circumstances where the Authority has very serious concerns about a firm, or the way its business is or has been conducted (SUP 6B.5.1G(1)).
15. SUP 6B.5.2G provides examples of the types of circumstances in which the Authority will consider cancelling a firm's Part 4A permission, and SUP 6B.5.2G(4) specifies that non-submission of regulatory returns is one such circumstance.

Chapter 16 of SUP sets out the Authority's reporting requirements

16. SUP 16.2.1G sets out that the purpose of the reporting requirements are:
  - a) to enable the Authority to obtain timely and accurate information about firms on a regular basis in order to discharge its function under the Act; and
  - b) to amplify Principle 11 by setting out in more detail the information that the Authority requires. The reports required help the Authority to monitor firms' compliance with the Principles governing relationships between firms and their customers, with Principle 4, which requires firms to maintain adequate financial resources, and with other requirements and standards under the regulatory system.
17. SUP 16.3.13R(1) requires that a firm submit a required report in the frequency, and so as to be received by the Authority no later than the due date, specified for that report.
18. SUP 16.3.13R(4) states that if the due date for submission of a required report will be determined by (a) the firm's accounting reference date; or (b) monthly, 3 monthly, or 6 months after the firm's accounting reference date, as the case may be, except where otherwise indicated.
19. SUP 16.3.14R requires a firm to pay an administrative fee of £250 if it does not submit a complete report by the date on which it is due in accordance with the rules or the provisions of relevant legislation and any prescribed submission.
20. SUP 16.3.15 states that the Authority may from time to time send reminders to firms when reports are overdue. Firms should not, however, assume that the Authority has received a report merely because they have not received a reminder.
21. SUP 16.12.3R(1)(a)(ii) requires that unless (iii) applies, where a firm is required to submit completed data items for more than one RAG, that firm must only submit the data item of the same name and purpose in respect of the lowest numbered RAG applicable to it, RAG 1 being the lowest and RAG 12 the highest.
22. SUP 16.12.3R(1)(a)(iii) specifies that where a firm is, but for this rule, required to submit data items for more than one RAG and this includes the submission of data items in respect of fees, the FOS or FSCS levy, or threshold conditions, that firm must only submit these if they belong to the lowest numbered of the RAGs applicable to it.
23. The specific reporting requirements for the Firm (which are relevant to this Final Notice) are set out in SUP and DISP and the rules referred to therein which stipulate the type,

frequency and due date of each of the regulatory reports which the Firm is required to submit, according to the regulated activities which the Firm has permission to conduct:

<b>RAG Number</b>	<b>Return(s) applicable (Relevant rule)</b>	<b>Frequency of return(s) to be submitted (Relevant rule)</b>	<b>Due date of return(s) to be submitted (Relevant rule)</b>
RAG 12 (Credit-related regulated activity)	CCR007 (SUP 16.12.29CR)	Annually (SUP 16.12.29CR)	30 business days (SUP 16.12.29CR)