

Policy Statement

PS25/3

Consumer Credit Regulatory
Returns: Credit Broking, Debt
Adjusting, Debt Counselling and
Providing Credit Information
Services

May 2025

This relates to

Consultation Paper 24/19 which is available on our website at www.fca.org.uk/publications

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Chapter 1

Summary

- 1.1** In Consultation Paper (CP24/19), we proposed a new regulatory reporting return for consumer credit firms engaging in one or more of the regulated activities of credit broking, debt adjusting, debt counselling services and providing credit information services. This return will ask more tailored questions about how a firm operates, engages with consumers, and uses its permissions. These changes will allow us to achieve our strategic objectives and become more efficient and effective in how we regulate the sector. Better quality data will allow us to act faster and more assertively where harm is greatest with less intensive supervision where appropriate.
- 1.2** This data, combined with the Product Sales Data (PSD) returns and other data sources like the Financial Lives Survey, will enable us to better understand consumers' experiences and more effectively supervise firms in this sector.

The new return seeks to make our expectations of firms clearer, using common industry terminology to help understanding. This will help firms to complete the forms more easily and result in less ad hoc information requests from us. The design of the return means we are only collecting what we need and will use and the information being provided is proportionate for each firm.

- 1.3** We intend to review and replace further returns for firms undertaking other consumer credit activities. We expect this review will gradually replace all our existing CCR returns in the long term. However, we have made the decision to slow down the implementation of the remaining phases in order to lessen the burden on firms and allow us to consider the impact, and value, of this new return and the PSD returns.
- 1.4** This Policy Statement (PS) summarises the feedback to our proposals and our response. It also sets out our final rules and guidance for incorporating the new return into SUP 16.

Who this affects

- 1.5** The rules in this PS will interest firms:
- engaged in credit broking
 - engaged in debt adjusting
 - engaged in debt counselling
 - engaged in providing credit information services
 - that advise, represent or provide software to support compliance with regulatory reporting for any of the above firms

The wider context of this policy statement

Our consultation

- 1.6** Since 2014, we have required consumer credit firms to periodically provide us with regulatory returns. These returns supply us with aggregated data for consumer credit activities. The data received is inconsistent and does not align with the harms we see in the sector, often requiring additional ad hoc data requests where we need further information to sufficiently supervise these firms.
- 1.7** The poor quality of the data, alongside changes to the way these markets operate, and the associated data needed to supervise it, have changed. This prompted us to initiate our multi-year review into the replacement of our consumer credit reporting (CCR) returns for regulated activities. CP24/19 was the second consultation we issued as part of this review, following [PS24/3](#), where we introduced 3 new PSD returns, to be completed by larger lenders.
- 1.8** For firms providing credit broking, credit information, debt adjusting, and debt counselling services, we want to better understand:
- their supply chains,
 - consumer understanding of products and services,
 - suitability of products and consumer support,
 - whether they are acting to deliver good retail customer outcomes in line with the Consumer Duty.

How it links to our objectives

- 1.9** Our final rules set out in this PS advance our operational objectives to:
- Secure an appropriate degree of protection for consumers (by enhancing our ability to identify and assess risks to them and preventing harm).
 - Protect and enhance market integrity (by allowing us to make quicker and bolder decisions so the market functions well).
 - Promote effective competition in the interests of consumers (through enhancing our ability to monitor the market).
- 1.10** The return will enable us to deliver against our strategic objectives including supporting our ability to be a smarter regulator through taking a more data led approach to better detect harm and focus our work on where it is greatest. It will also support us in fighting financial crime by improving our ability to identify firms who aim to use FCA authorisation as a cover for crime and where they do not need to hold the regulated activities in scope of this return.
- 1.11** The new return also seeks to make our returns easier to understand and complete. This supports the Government's aim to make sure firms have a positive experience engaging with the FCA, which the Government specifies is important for supporting growth in the [Treasury's November 2024 remit letter](#).

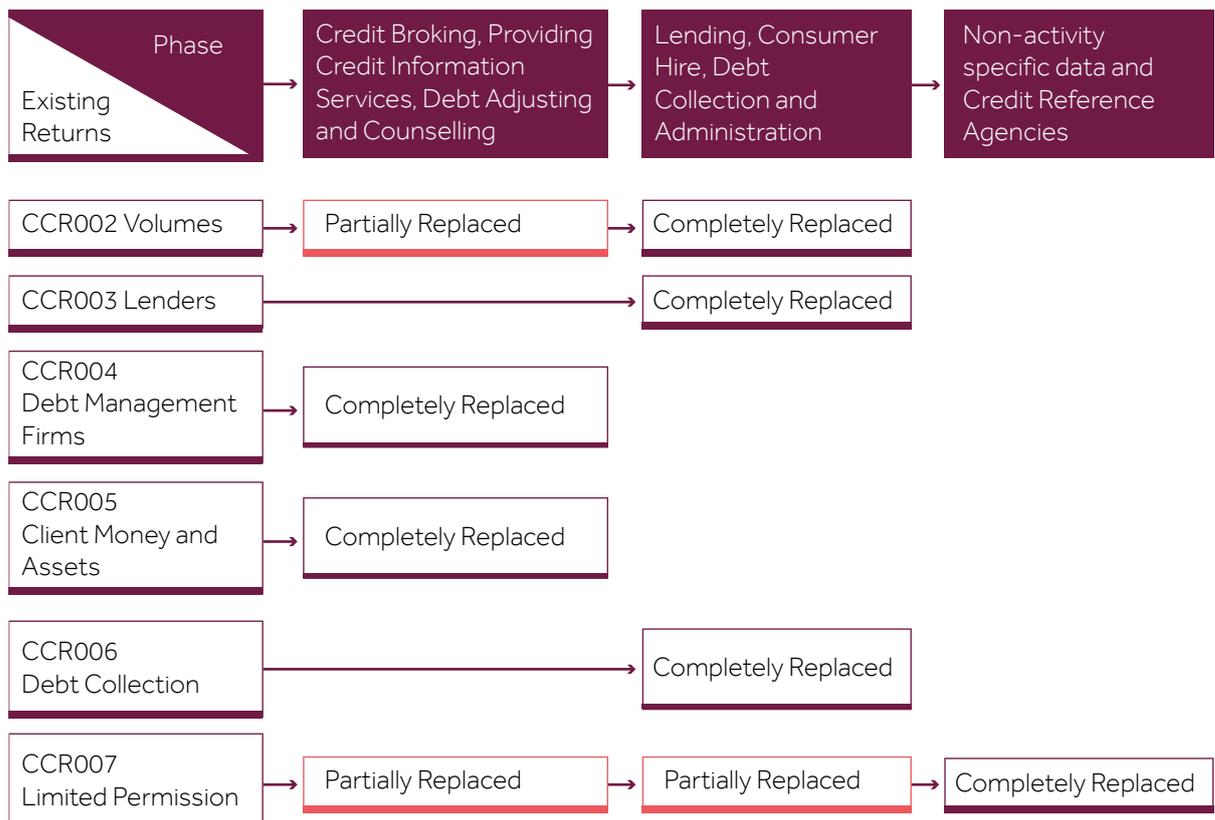
Secondary international competitiveness and growth objective

- 1.12** In implementing these measures, we have considered our secondary objective to facilitate the international competitiveness of the UK economy and its growth in the medium to long term. While the proposals may increase our data requirements for firms, we have aimed to reduce our reporting burden by streamlining report elements to enable firms to meet our requirements more easily.
- 1.13** We believe this return is compatible with our secondary objective. While we do not expect the new return to materially affect the international competitiveness of the UK economy, it aims to improve market integrity and prevent consumer harm. This should encourage consumer trust and confidence in the UK's consumer credit market resulting in long-term sustainable economic growth.
- 1.14** By improving our ability to supervise firms effectively and proportionately, through access to quality data that identifies earlier those firms presenting the highest risk of harm to consumers, we will be able to spot trends in how the consumer credit market is evolving and make sure that we monitor the evolution of markets over time. We also expect the data collected to provide a robust evidence base for policy making, for example, to support the Treasury in their decision making around reforming the Consumer Credit Act 1974.

What we are changing

- 1.15** We are introducing a return which will collect data from consumer credit firms with permission to engage in any one, or more, of the regulated activities of:
- credit broking
 - debt adjusting
 - debt counselling
 - providing credit information services
- 1.16** The new return will have 5 mandatory sections of questions for all firms in scope followed by tailored questions specific to firms' permissions. The 5 mandatory sections will ask for data about firms':
- Permissions – the regulated activities firms have undertaken in the past 12 months.
 - Business model – the financial products, goods, and/or services firms are providing.
 - Marketing – the channels firms use to acquire consumers.
 - Revenue – total revenue from credit-related activities and non-credit related activities.
 - Staff – the number of employees, and incentive and remuneration arrangements.
- 1.17** The new return will replace elements of CCR002 - Consumer credit data: Volumes and CCR007 – Consumer credit data: Key data for credit firms with limited permission.

- 1.18** Some of the new return's data elements will initially overlap with our other CCR returns. This is an interim stage until we complete our review of the remaining credit related returns.
- 1.19** We are providing regulatory forbearance so that any firms that submit CCR009 do not need to provide similar information on CCR002 or CCR007 where they relate to their credit broking, or debt management, activities (full details set out in our response to question 5 of the consultation).
- 1.20** The removal of the existing returns will be completed following a further consultation of the remaining consumer credit activities. Our decision to slow down the pace of change in order to ease the impact on firms in scope means that this overlap will take longer than previously anticipated.
- 1.21** To reduce the impact of this overlap, we will be consulting separately on changes to the scheduling of existing returns for firms in scope to bring them in line with the calendar year reporting. For most firms this will mean a shorter window in which they are expected to submit data on these activities and reducing the time needed to collate and provide information to us.
- 1.22** For principal firms, the data return must include consolidated answers from all your Appointed Representatives (ARs) unless specified otherwise. Where directed otherwise, this would either include reporting as the principal firm only or separately as the principal firm and for activities undertaken by ARs. This includes data elements which ask for qualitative information as well as figures. This data on the regulated activities of ARs will be used to support the information received through REP025 that covers the oversight and monitoring by Principal firms.



Outcomes we are seeking

- 1.23** The new return will give us important information about how consumer credit markets are functioning, including how firms are undertaking activities and using their permissions. This will help to inform our supervision, including whether firms are achieving the Consumer Duty outcomes.
- 1.24** This improved data will enable us to focus on firms where we see the greatest harm and take a more proportionate approach to firms which present lower risk to consumers.
- 1.25** Firms will be able to anticipate the data they will need to provide enabling more regulatory certainty and improving the experience for firms as the need for unscheduled data collections will significantly reduce.

Measuring success

- 1.26** The return will help us align with our strategic priority of being a smarter regulator. Through better use of data and technology we will be able to be more efficient, effective and proportionate, acting more quickly to deal with harm and enabling less intensive supervision of those firms demonstrably seeking to do the right thing.
- 1.27** As set out in CP24/19, we expect:
- To more effectively target our supervisory and policy resource as we will be able to identify harms quicker and prioritise our engagement accordingly.
 - To intervene and reduce the level of risk faster as well as more accurately identify where intervention is not required.
 - To more quickly identify firms who are not using their permissions and remove those permissions faster avoiding the potential 'halo' effect where consumers are misled about the level of protection offered.
 - The number of ad hoc information requests we issue to firms to decrease.
- 1.28** For firms, we expect:
- The number of queries from firms about how to complete our returns to decrease.
 - The number of returns submitted late to us to decrease.
- 1.29** As part of the FCA's Rule Review Framework, we are providing an additional way for stakeholders to give evidence where they feel that our rules are not achieving their intended outcomes, as set out above, once implemented. You can do this using our online feedback form.

Summary of feedback and our response

- 1.30** We received 74 responses to CP24/19, including from the main trade associations who responded on behalf of their members. Our final measures have been informed by this feedback as well as extensive engagement with firms and trade associations.
- 1.31** Overall, the feedback was positive with most comments pertaining to the scope of our data elements and/or clarifying our expectations. Respondents welcomed the return's proposed structure and frequency of submissions. Moreover, most firms appreciated the ease of completing the new return through branching logic. Most firms were able to complete the return prototype issued for testing alongside the consultation as expected.
- 1.32** However, in response to feedback, we have reduced by 27% the number of questions asked in the return. We have also made changes to make our rules clearer and more effective. These include:
- Removing questions where a large proportion of firms suggested they would need to request data from lenders.
 - Changing the data required from credit brokers from successful applications to total introductions. This is to make it easier for firms to provide the data.
 - Allowing firms who potentially don't hold all of the data required for the entire 12 months to annualise this information for the first reporting period.
- 1.33** We did not receive substantive feedback on our questions on Providing Credit Information Services. Outside of changes to some of the guidance and general changes relating to Appointed Representatives, we've made no other changes to these sections.
- 1.34** The reduction in the volume of information compared to the original proposals will leave gaps in our knowledge and visibility of firms' activities across the whole sector. However, we plan to use other existing returns, and data already being reported, to give us partial insights in these areas. We believe that removing these questions will significantly reduce the impact on firms and is a more proportionate approach. We do not consider that the final rules differ significantly from the draft rules we consulted on, as the changes are aligned with the policy intention we consulted on and do not affect the original cost benefit analysis (CBA).

Equality and diversity considerations

- 1.35** Under the Equality Act 2010 we are required by the public sector equality duty to have due regard to the need to eliminate discrimination and other conduct prohibited by that Act, to promote equality of opportunity in carrying out our policies, services and functions and to foster good relations between persons who share a relevant protected characteristic and persons who do not.
- 1.36** Before consulting, we considered the equality and diversity issues that may arise from our proposals and did not think they gave rise to any concerns. We did not receive any feedback on these considerations, and our assessment remains unchanged. So, we

do not consider that these rules and guidance materially impact any of the groups with protected characteristics under the Equality Act 2010 (in Northern Ireland, the Equality Act is not enacted but other anti-discrimination legislation applies).

Environmental, social & governance considerations

- 1.37** In developing these proposals, we have considered our duty under section 3B(1)(c) of FSMA to have regard to the need to contribute towards the Secretary of State achieving compliance with the net-zero targets, in section 5 of the Environment Act 2021. We do not think there is any contribution these proposals can make to these targets.

Next steps

What you need to do next

- 1.38** If your firm is affected by these changes, you need to make sure you meet the requirements of the new rules so that your reporting is in line with the changes set out in this PS. You will need to implement the changes within the timescales set out in Appendix 1 Handbook Text and highlighted in Chapter 2.

What we will we do next

- 1.39** We will continue to engage with industry throughout the implementation period and provide additional supporting information where appropriate. We anticipate further consultations on the data we collect on the consumer credit market, however, in order to minimise the impact of the pace of change, especially for lenders already in scope of the new PSD returns, we will delay further consultation on other consumer credit activities until after the implementation of these returns.

Chapter 2

Consultation feedback

- 2.1** In this chapter, we summarise the feedback on our proposals for issuing a new consumer credit return as set out in CP24/19. Our response to each of the questions takes into account the responses to CP24/19 and, where applicable, feedback from the prototype of the return.

Proposed data elements

Question 1: Do you agree with the questions, or data, proposed to be collected (eg the proposed format of, or guidance around, the data)? Please provide details.

Question 2: Will any of the proposed questions, or data, cause practical issues (eg requiring data you don't currently, or would struggle to, collect)? If yes, please explain why, including whether this is because of your particular business model or the way in which you structure your business activities?

General comments

- 2.2** A third of respondents welcomed the structure we proposed for collecting the data, including the questions we posed and how we aligned them to firms' regulatory activities and permissions.
- 2.3** Some respondents commented on the costs and regulatory burden of our proposals, particularly where firms will also need to submit our new PSD returns initiated in PS24/3.
- 2.4** Some respondents mentioned potential duplication of data collection, especially for data collected from lenders through the new PSD returns. Respondents questioned whether this data would also have to be collected from brokers.
- 2.5** Over half of respondents provided suggestions for clarifying or improving the data we propose to collect to better capture the nuances of their activities.

Permissions and regulatory activity

- 2.6** Some respondents struggled with the initial contextual questions on how they use their permissions and which activity option was relevant to their business model. Based on submissions from the prototype, most firms were able to complete the return as expected. However, some groups were less clear on which of the return's options applied to their business model.

- 2.7** There was some confusion around which regulatory activities are in scope, including whether regulated activities outside consumer credit should be included.
- 2.8** Some respondents commented on the difficulty of supplying information where firms have multiple business channels.
- 2.9** One respondent stated that for firms whose business is not primarily consumer credit, the new returns may cause a disproportionate amount of work.

Data not readily available

- 2.10** Some firms mentioned a lack of access to loan agreement data and the costs of setting up their systems to provide the required level of information. This feedback was not specific to a particular group of firms (neither by sector nor based on their size of the product offering). However, the overall proportion of firms where this data wasn't available was higher than initial stakeholder engagement indicated.
- 2.11** Many credit brokers pointed out that the details of credit agreements, such as APR, the term of the agreement, and especially the number of successful/declined introductions, are not readily available to them. To provide this information, they would need to request relevant data from the lenders. Credit brokers noted this will place an additional burden on the largest lenders as they will also be reporting the PSD returns at the same time.
- 2.12** Some respondents found the marketing spend question difficult to quantify, as their spending could relate to a general promotion or brand campaign rather than a specific regulated activity product or services.
- 2.13** A few respondents felt that the type of business they operate does not work well with the proposed changes.

Our response:

Alignment with PSD

Only firms with over £2m in outstanding / new lending will submit the PSD returns for consumer credit agreements, with reporting beginning in 2025. Our intention of requesting similar information directly from brokers was to make sure we had visibility of key information on all (approximately 20,000) credit brokers we have oversight of. Our initial industry engagement led us to believe this information was likely to be readily available. However, subsequent feedback indicates it is not as widespread as first expected. In addition, feedback highlighted that lenders would be the most affected from requiring this information as they would have to share this information with all brokers in their supply chains at least once a year.

Following this feedback, we removed a large number of questions from the return which can, in part, be derived from the more granular PSD returns. While this will result in some gaps in the data we receive, limiting our visibility of the sector, we estimate these gaps will be relatively

small. The additional burden on lenders, especially those larger lenders submitting the PSD returns, would not be proportionate.

The majority of remaining questions each firm would submit (based on the branching logic) will be contextual, which should be much easier for firms to provide. Overall, 57 questions have been removed accounting for a 27% reduction in questions with 52 of those questions being numeric (a 39% reduction in the number of questions requiring data to be submitted).

Summary table:

	Unique contextual questions	Unique numeric questions	Overall unique total	% Unique contextual questions	% Unique numeric questions
CP	80	132	212	38%	62%
PS	75	80	155	48%	52%
Actual Difference	5 (6%)	52 (39%)	57 (27%)		

* Please note numbers from the summary table exclude data table header rows. Contextual questions include: multiple choice, single choice, yes/no and free text questions.

The following questions have been removed for each credit broking section relating to financial products, motor vehicles (both credit and hire) and goods & services (both credit and hire):

- total number of agreements
- total value of agreements (£)
- maximum value (£)
- minimum value (£)
- average value (£)
- maximum APR (%)
- minimum APR (%)
- average APR (%)
- maximum term of agreement (months)
- minimum term of agreement (months)
- average term of agreement (months)

We have also removed the requirement to provide the following data relating to the credit broking section on relationships between lenders, brokers and owners:

- total successful introductions
- total declined introductions
- total non-successful introductions

Additional supporting materials / guidance

In a total of 59 (37%) of the final data elements and questions, we have added further guidance to help firms understand what is expected for each question or to further specify what should, or shouldn't, be included. These have been based on a combination of the feedback received and analysis of the submissions to the prototype.

Examples of these changes include:

- Additional options where firms suggested existing options didn't align with their activities or where multiple options could be selected.
- Additional guidance on what should, or should not, be included for staff or commission.
- More detailed definitions or references to existing handbook terms to support firm understanding.
- Alignment with more common industry language.

For example, we understand that firms may hold their permission for specific reasons but not actively use it and provided answer options for these scenarios. However, from our analysis and feedback, some of the answer descriptions were misunderstood. So, we have added further clarification and amended terminology based on firm feedback.

Collecting this information is important to support our work to remove unused permissions from firms faster. These changes should also improve the quality of the information we collect by improving clarity.

To minimise incorrect data being submitted, we are publishing a 'flow diagram' which sets out clearly the questions within the return and the decision points that make up the branching logic. This diagram should aid firms in understanding exactly what is required of them based on their business model and help them prepare for submitting their return. We will also work with industry and relevant trade bodies to create guides for the most common business models to aid firms' understanding of the return. It will not be possible to create these guides for the full range of business models with permissions covered within this return, but there are some groups with common business models that make up a large proportion of firms. For example, secondary brokers in the retail or motor sector and general insurance or mortgage intermediaries where credit is ancillary to their main activities.

Sales channel and marketing

Firms were concerned that it is difficult to distinguish between marketing spend on general brand activity and regulated activity. So, we have removed the need to further breakdown marketing spend and the number of referrals or accepted agreements per channel.

The following questions have been removed from the credit broking section on sales channel and marketing:

- What is your firm's marketing spend on the channels as reported?
- Tell us about the number of referrals/agreements accepted per channel.

Credit broking

Credit broking activity options

Feedback indicated there was confusion as to which credit broking activities applied to firms, with a proportion of prototype submissions having chosen activities which didn't align to their business model. This was especially prevalent where credit broking was not the firm's primary business.

Based on this feedback, we have simplified the options describing the credit broking activity a firm has undertaken within the reporting period.

Further, we received questions seeking to clarify the difference between Option A compared to Options D and E. The significant volume of uncertainty around Options D, E and F indicated that, in its current format, the question would likely lead to significant data quality issues.

To simplify the question and improve the quality of the data we receive we have combined the 3 credit broking activities specified by Article 36A(1) (d), (e) and (f) of the Regulated Activities Order for which a fee is paid. The other 3 credit broking activities which cover introducing to a lender, introducing to an owner and introducing to another credit broker will remain and will we add common examples of each to help firms select the option relevant to their business model.

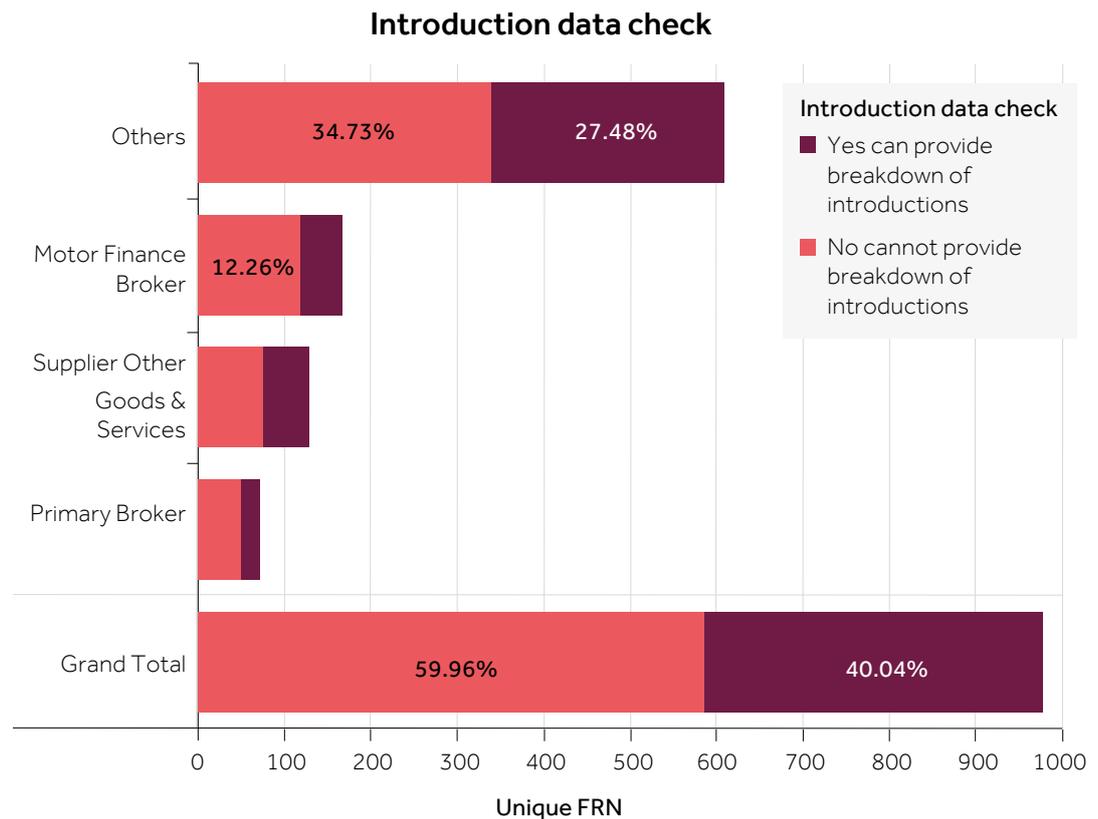
- A - Introducing a consumer to a prospective lender to enter into a credit agreement
- B - Introducing a consumer to another person, with a view to that person entering into a consumer hire agreement as owner
- C - Introducing a consumer to a credit broker with a view to the consumer entering into a credit agreement or consumer hire agreement
- D - Presenting or offering an agreement which would (if entered into) be a credit agreement
- E - Undertaking preparatory work for a consumer with a view to that consumer entering into a credit agreement
- F - Entering into a credit agreement on behalf of a lender
- G - None of the above

The highlighted options above will be merged and replaced with 'D - Charging a fee in relation to one of the credit intermediation activities described in article 36A(1)(d-f) of the Regulated Activities Order, only and not options (A), (B) or (C) above'.

Successful and declined introductions

Feedback highlighted that not all firms have oversight of the number of introductions that result in a successful agreement and the value of those agreements. So we have removed the requirement to break down brokers' introductions into successful and declined introductions. Instead, we will only ask for the 'Total number of introductions' effected by the broker.

The total number of introductions is the simplest and most consistent way to assess volumes and feedback indicated that this would be more readily available for firms without the need to request information from third parties. Moreover, we will be able to estimate these figures based on the total number of introductions and the number of successful agreements reported in the PSD returns. This should reduce the burden on lenders and the small number of firms whose business model means they will affect an introduction but may not have a more formal relationship with the lender.



Zero or 'negative' commission

Some firms highlighted that they do not earn a commission from broking credit agreements, and instead pay a commission, subsidy or merchant fee to the lender, which result in negative values for total commission and total revenue. To accommodate this scenario, we have introduced a separate data field for commission or merchant fees paid to the lender.

We expect the value to be a positive figure and, if no other income is earned, total commission and revenue would be zero.

For the section on the top 5 relationships if no revenue is received, then firms should enter the top 5 by commissions/merchant fee paid.

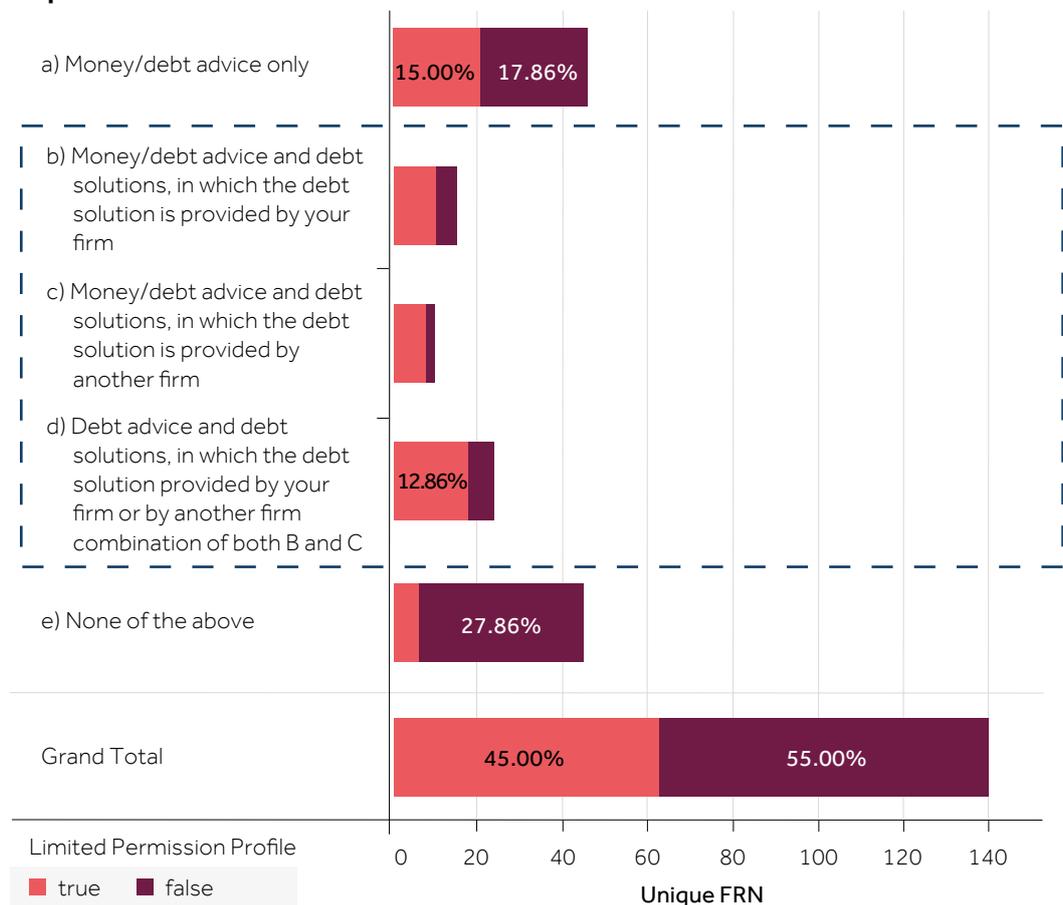
Debt advice / solutions

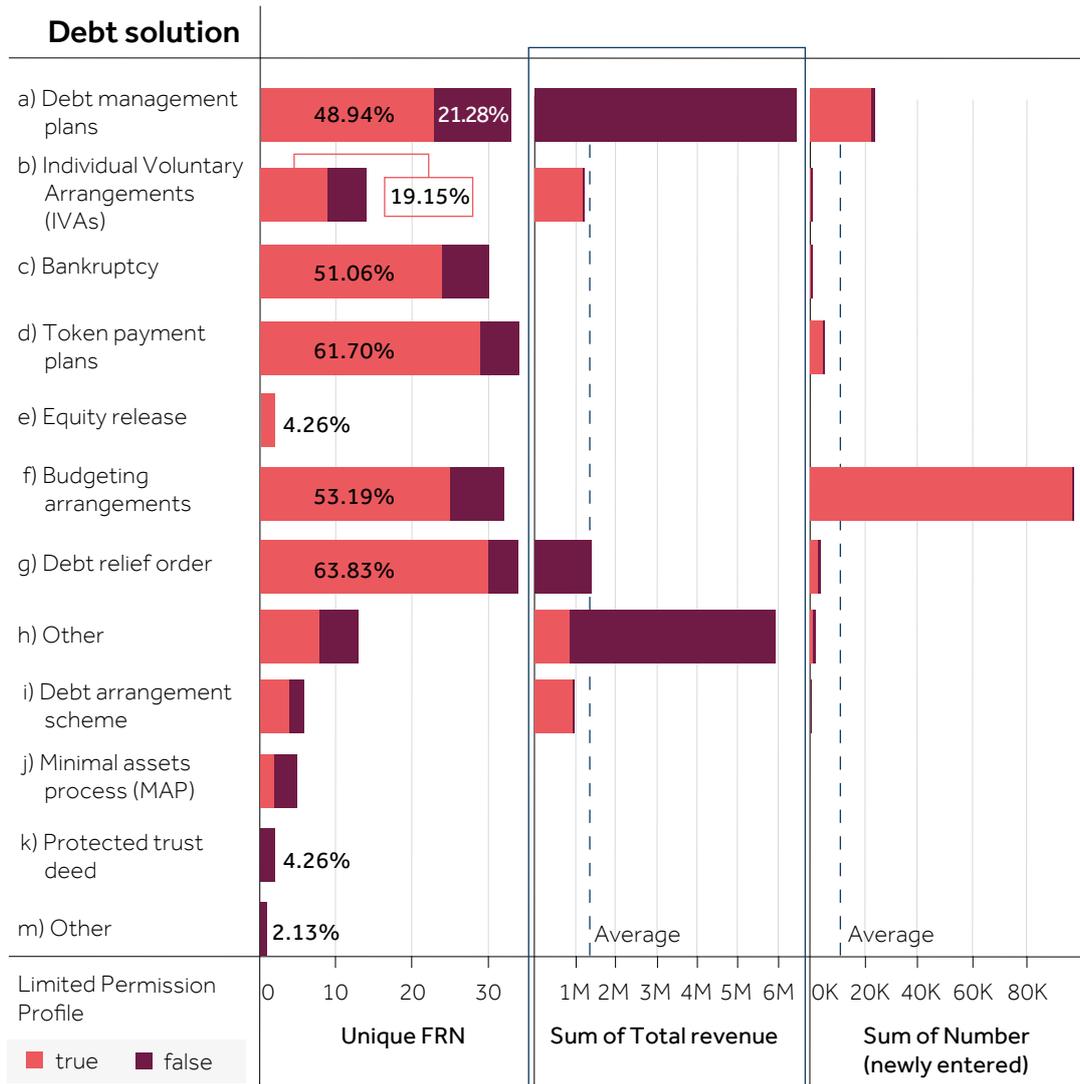
Feedback highlighted the difficulties some debt advice firms may have in providing the data in the way the questions were structured in the consultation. In particular, where some debt solutions may be administered by the firm themselves while others may be recommended but provided by a third party.

To make it easier for firms to provide this data, we have split this question for each debt solution available.

Feedback also indicated that these firms were unclear on how to provide the revenue information related to these solutions, including whether it was only the initial fees or all fees and, if so, the period those fees should cover. We have amended this section to include a more detailed breakdown of revenue by up-front and on-going fees if the solution is administered by the firm itself.

Are you a firm that offers money/debt advice and/or provide debt solutions?





Reporting Burden

Question 3: If you do not currently collect specific information which is included in these proposals, how difficult would it be for you to start collecting this data?

Feedback received:

2.14 Many respondents indicated they would need to update their data collection systems and processes to supply the new return but did not expect this to be onerous. Some mentioned that it would take time to manually enter data from physical hard copies into their systems.

- 2.15** Several respondents pointed out that collecting this new data would be more challenging for smaller firms, specifically around collecting data from lenders.
- 2.16** As noted in Question 1, a few respondents engaged in credit broking stressed that the proposals would require them to establish data sharing arrangements with lenders and update their systems accordingly. They expressed concerns that this could impact implementation timescales, particularly where lenders are implementing the PSDs at the same time. In addition, they were concerned that lenders may no longer use small brokers if the data sharing arrangements become overly burdensome and costly.
- 2.17** Where firms' in-scope activity(s) is ancillary to their main business, some respondents argued the required data elements would be challenging to record. For example, 2 respondents explained that quantifying their marketing and tracking their referrals, specific to their debt advice services, would be difficult as this service is only provided to their customers who are already using their housing services. Likewise, an insurance provider noted that it would be difficult to separate the number of employees and marketing spend for their premium finance insurance products from their other out-of-scope insurance products.

Our response:

To reduce the burden on credit brokers and their lenders, we have removed the requirement for information that would need to be shared by lenders, as outlined in our response to Q1. Where possible, we will use data from the PSD returns to examine agreements further.

We have also reduced the detail required on marketing spend as well as questions around staff levels and compliance functions.

To ease reporting, we have reduced the number of questions in the return, and removed questions concentrated around detailed breakdowns of data. This means that half of the return's questions are now contextual around firms' business models and activities. These questions are simpler as they only require firms to select from options, which feedback indicated would be relatively easy for firms to provide.

Implementation

Question 4: Do you agree with the proposed timeline for implementing these returns?

Feedback received:

- 2.18** While nearly half of the respondents considered our proposed timelines suitable, the same number suggested we extend our proposed timelines. About a fifth of those who responded had no view or expressed some concerns.

- 2.19** Many of the respondents who found our timelines too short noted they do not currently have the infrastructure to collect the proposed information. They argued extra time would enable them to establish necessary data collection processes and systems, including working with data partners, designing processes, and training staff. They added that extra time to implement these changes would result in their providing better quality data.
- 2.20** Among those who raised concerns, respondents in both credit broking and insurance industries noted that the new returns would require them to create new systems and data-sharing arrangements, particularly for lenders and brokers to capture introductions and referrals.
- 2.21** As we consider feedback before issuing our final requirements, some respondents were concerned that we may amend our proposals after the date firms would need to start collecting relevant data in time for the first return submission. They argued this could result in inadequate data and unnecessary costs for firms, including additional amendments to their IT systems and backdating data requests.
- 2.22** We received suggestions for extending our timelines, including implementing our proposals in phases or designating the first year a pilot period so that firms could adopt the changes without risking non-compliance.

Our response:

We have considered all feedback on the implementation timelines. By removing a substantial amount of our proposed questions, specifically the ones firms suggested would be difficult to provide, we expect reporting and consequently timelines will be easier to manage.

While the feedback, as well as data submitted via the prototype, indicates that all other data is already available, we cannot be certain this is the case for every item of data for every firm. On that basis we have amended the rules to make sure firms are able to complete the return in the first year.

Any firm which is a relevant ancillary credit firm as at 7 May 2025 which does not have sufficient data to report for the entire first reporting period must calculate an annualised figure based on the actual data available where possible.

The way the return is designed, means the first part is applicable and straightforward to complete for all firms. Firms have to select options that apply to them, and this helps us understand the firms' business models, how firms are using their permissions and how firms can be categorised, but does not ask for data. Collecting contextual information alongside even annualised data will still provide significant benefit but reduce any potential burden or risk of non-compliance for firms.

Frequency of submissions

Question 5: Do you agree with the proposed frequency of submissions, in line with a fixed calendar year?

Feedback received:

2.23 Over half of all respondents agreed with our proposed frequency of submissions, in line with a fixed calendar year.

Frequency

2.24 Most respondents agreed with our proposals to maintain the current reporting frequency (6-monthly for full permission firms with annual revenue over £5m, 12-monthly for full permission firms with annual revenue up to and including £5m, and annual reporting frequency for limited permission firms). They agreed that the frequency of reporting, dependent on the size of a firm's credit related revenue, was proportionate.

2.25 A couple of respondents were concerned that the frequency coupled with the new data elements and proposed implementation date would be overly burdensome for smaller firms. They felt this could potentially drive smaller firms out of the market and stifle competition.

Fixed calendar year

2.26 Less than a third of respondents disagreed with our proposal to align submissions with a fixed calendar year. Instead, most of those who disagreed suggested we align submissions with firms' accounting reference dates (ARDs), akin to Retail Mediation Activities returns, so that they are in sync with other regulatory reports. They argued this would avoid duplicating information gathering and reduce reporting burdens as firms could better plan and repurpose their resources, particularly where information requests overlap.

Our response:

Our proposed timelines and frequency were designed to give us directly comparable data across firms to help us draw peer comparisons and identify potential outliers.

Collecting data on a calendar year will align this return with the new PSD returns, which should avoid duplication of data gathering and reporting.

We also believe that those firms that undertake Retail Mediation Activities (especially mortgage intermediaries) will be required to supply far less information for this return due to the previously mentioned changes and clarifying information we will provide. This should reduce the burden on these firms, rendering alignment to other returns inconsequential.

While we are conscious of the potential impact on smaller firms, we do not believe that providing this information less than once a year would give us sufficient information to monitor the sector. Moreover, without this data, we cannot establish whether firms continue to meet the Threshold Conditions.

In order to reduce the impact on firms from reporting until the existing CCR002-007 forms are switched off, we will allow firms to not report against specific data fields within CCR002 and CCR007 where the subject matter is duplicated in CCR009. However, the remaining fields are still required to be completed.

The specific data points which firms do not have to complete are:

CCR002

- Revenue data in column B for all relevant activities must be completed but data relating to fee mechanism, total customer and total transactions in rows 9 (credit broking) or 10 (debt management activities) may be left blank.

CCR007

- 1A-3A where these relate to credit broking or Not-for-profit Debt Management activities only,
- Where a firm undertakes additional Limited Permission activities, they should still report information based on those other activities (eg limited permission lending or consumer hire).

We also plan to further consult on the potential to amend the existing reporting schedules for some firms in scope of this return in order to align them and reduce the number of times a year a firm will have to submit data to us.

Appointed Representatives

Question 6: Will the proposal for principal firms to submit consolidated data, including the activities of Appointed Representatives, cause any difficulties or lead to any potential issues? If so, please provide details including whether the data should be split by own activities and those of Appointed Representatives.

Feedback received:

- 2.27** A third of the respondents agreed with the proposal, stating that they are already consolidating the data due to the impact of the AR Instrument reporting changes.
- 2.28** A few respondents stated that for principal firms overseeing several ARs, consolidating data could be challenging due to the different systems and processes used by ARs.
- 2.29** Some principals who act as regulatory hosts highlighted that the design of the return didn't allow them to show where these activities were undertaken by ARs or by the principal firm which could lead to confusion and misrepresentation.
- 2.30** Nearly half of the respondents marked this response as 'not applicable'.

Our response:

Although we expect this proposal will only affect approximately 6% of the population, it is important that principal firms have sufficient oversight to provide either consolidated data, split data for both the principal and their ARs, or data for only the principal itself.

We expect principal firms to include a consolidated view of the activity carried out by the principal firm and their ARs (including Introducer ARs) unless specified otherwise. This applies to data elements which ask for qualitative information as well as figures.

On the updated amendments to the data items, we have included questions where firms should provide separate data for both the principal and their ARs. As such, some questions will be repeated and separated out to be answered on behalf of both parties. Similarly, some questions will need to be answered only for the principal itself. This includes both contextual questions with multiple choices, such as sales channel, or numerical questions, such as total number of introductions.

Firms will only be asked to provide this data if they have active ARs registered with us and is not based on any branching logic of questions.

Chapter 3

Cost-benefit analysis

3.1 In CP24/19, we presented a cost-benefit analysis (CBA) of our proposal.

3.2 We asked the following 2 questions:

Question 7: **Do you have any general comments on our cost benefit analysis?**

Question 8: **Once you have the new systems in place, what resource would you allocate to the collation and reporting of this data? Do you have an early indication of the likely scale of the costs involved?**

3.3 We discuss the feedback and our response, below.

3.4 We received a range of responses from firms for both Q7 and Q8. Some firms agreed with our CBA and supported our proposed new return. These firms also suggested that they would not face significant resource or cost implications from the proposal. Around half of firms, however, expressed scepticism about our cost estimates, with many suggesting that the costs are significantly underestimated, especially for smaller firms. However, only 2 firms gave examples of alternative cost estimates, for compliance support and external training, which we have considered. Most firms did not give us updated figures or evidence these claims.

3.5 Firms who thought our cost estimates were understated argued that, contrary to our assumptions, some of the new return requires them to provide data that is not readily available. For example, respondents stated that firms, such as credit brokers, will need to request data from lenders. These firms thought that significant resource would be required to gather the requisite data and complete our proposed returns.

3.6 Respondents suggested that smaller firms would face the greatest burden from our proposed return. They argued that smaller firms would likely need to invest in new data-gathering systems, staff training, and potentially outsource compliance support to meet the requirements. They claimed that smaller firms in particular may struggle to absorb these costs without operational impacts. Some firms suggested that additional costs would be passed on to consumers.

3.7 Several firms shared concerns about the proportionality of our proposal, stating that the benefits of our proposal are unclear or uncertain relative to the costs. One firm suggested that smaller firms with simpler operational structures may not experience the long-term benefits.

3.8 A few respondents were concerned that the volume of data being requested is disproportionate compared to the volume of consumer credit business being undertaken. Some firms suggested that smaller firms, especially, smaller brokers, and

those specialising in specific sectors may exit the market, as they will not have the resources or be able to afford to comply with the new proposals. There was also some concern about other FCA regulatory requirements and changes that firms may face in parallel to our proposal. Some firms suggested that they would struggle to provide data within the planned timescales.

Our response:

We understand and have considered firms' concerns about the proportionality of our proposal and the potentially disproportionate impact on smaller firms. Following firm feedback, and as mentioned previously in the PS, we have changed our proposal to reduce the burden on firms. This should mean the new return is more proportionate, especially for smaller firms.

Our CBA estimates were for the additional costs associated with our proposals compared to the existing returns, rather than the overall cost of completing the new return. Nonetheless, we accept that our initial estimates were understated. We assumed – following industry engagement – that the data requested was likely to be readily available to firms. Firm feedback indicates this is not universally the case. This means our initial estimates incorrectly omitted most of the costs associated with gathering data that is not readily available.

We have amended our proposed return by removing the majority of questions where a large proportion of firms suggested that the data required is not readily available and would need to be gathered from other firms. This has led to a reduction of around 27% of the original proposed return. We will also now allow some firms to provide an annualised figure based on actual data in the first reporting period where data is not readily available for the entire period. These changes should make it easier for firms to complete the new return and mean that they are unlikely to incur substantial additional costs from gathering data that is not readily available. Overall, we believe these changes should mean that our original cost estimates now accurately reflect the actions firms will need to take (explained further below). We expect our changes to especially reduce the burden on small firms, including smaller brokers and those specialising in specific sectors. So, we do not consider that our proposals are likely to significantly increase firm exits.

Overall, we consider our original cost estimates now broadly hold, and do not need to be updated. We believe that the reduction in the number of questions will not lessen our estimates of the one-off costs to firms, associated with familiarisation and gap analysis, and IT and change project costs. We estimated, on average, a one-off cost per small firm of £1,460 and ongoing costs are estimated to be £70 per year per small firm. These costs were the most substantial part of our initial estimated cost to firms in CP24/19 (total estimated cost was £47.6m of which £45.3m was one-off cost, and the remainder ongoing costs). This is because firms will still need to make the same changes to their IT

systems and put these changes through internal governance processes irrespective of the number of questions asked in the return. While the ongoing costs to firms of collating and reporting the data required may be reduced by removing questions, this change is unlikely to be linear, and, in the absence of further evidence, difficult to quantify. As the reduction will be small (a linear reduction – which would be an overestimate – would reduce our ongoing total cost estimate to firms of £2.3m per year by £0.6m to £1.7m) we believe it is reasonable to leave our cost estimates unchanged.

Finally, we anticipate there will be a slight reduction to the benefits, as we are removing a large number of questions from our new return, and, as a result, collecting less information. In place of the removed questions, we aim (where possible) to derive data from the more granular PSD returns, and, where this is not possible, we anticipate that any gaps will be relatively small. As we used contextual examples of benefits in our CBA, it is not possible to quantify a potential reduction in the benefits. Nevertheless, we do not think that any reduction would be significant and remain confident that the benefits of the proposal will outweigh the costs. This is because the core basis for additional benefits remain unchanged i.e. it remains the case that we are updating our return to gather more up-to-date, accurate, and better-quality data. This will help to improve our decision-making as a regulator and our monitoring of the wider market to quickly identify and remedy any emerging harms. This data can be derived from the remaining questions in the new return – even if contextual – and aligns with the examples of benefits that we gave in the CBA. As discussed in our CBA, it is not reasonably practicable to quantify and/or monetise these proposed benefits in full. The positive outcomes of this intervention depend on how data from the new return is used in future supervisory and policy interventions, how accurately we identify the drivers of harm from this data, and how effectively we resolve it.

Annex 1

List of non-confidential respondents

We are obliged to include a list of the names of respondents to our consultation who have consented to the publication of their name. That list is as follows:

57 Dental Care

Acorn to Oaks Financial Services Ltd

AFS Group Holdings Ltd

Association of Mortgage Intermediaries (AMI)

Association of Professional Compliance Consultants

Automobile Association Insurance Services Limited

Aviva

AXA Insurance

Bedcare Ltd

BMW (UK) Limited

Brian William Wroe

British Gas Services Ltd

British Vehicle Rental and Leasing Association (BVRLA)

Capita Customer Management Limited

Capital Credit Union

Consumer Credit Trade Association (CCTA)

Christians Against Poverty

Clear Score Technology Ltd

Compare The Market Ltd

Compliance4u Limited

Currys Group Limited

Debt Managers Standards Association Ltd (DEMSA)

DJ Compliance

Experian

FCA Smaller Business Practitioner Panel

Finance & Leasing Association

Ford & Company General Insurance Brokers Limited

HCLTECH

Howden Group

HSBC UK

IJK Regulatory Consulting Ltd

Insurance Compliance Services Ltd (ICS)

Money and Pensions Service

MoneySavingExpert

MONY Group Financial Limited

National Association of Commercial Finance Brokers (NACFB)

National Franchised Dealers Association

Necla Bakirci

SimplyBiz Services Limited

The GIConsultant.co Limited

Vanquis Banking Group PLC

Ziifa Home Loans & Protection

Annex 2

Abbreviations used in this paper

Abbreviation	Description
AR	Appointed Representative
ARD	Accounting Reference Date
CBA	Cost Benefit Analysis
CCR	Consumer Credit Reporting
CP	Consultation Paper
ESG	Environmental, Social and Governance
FSMA	Financial Services and Markets Act 2000
OFT	Office for Fair Trading
PS	Policy Statement
PSD	Product Sales Data
SUP 16	Supervision Manual

Appendix 1

Made rules (legal instrument)

**CONSUMER CREDIT (REGULATORY REPORTING) (AMENDMENT) (No 2)
INSTRUMENT 2025**

Powers exercised

- A. The Financial Conduct Authority (“the FCA”) makes this instrument in the exercise of the following powers and related provisions in the Financial Services and Markets Act 2000 (“the Act”):
- (1) section 137A (The FCA’s general rules);
 - (2) section 137T (General supplementary powers); and
 - (3) section 139A (Power of the FCA to give guidance).
- B. The rule-making provisions listed above are specified for the purposes of section 138G(2) (Rule-making instruments) of the Act.

Commencement

- C. This instrument comes into force on 7 May 2025.

Amendments to the Handbook

- D. The modules of the FCA’s Handbook of rules and guidance listed in column (1) below are amended in accordance with the Annexes to this instrument listed in column (2).

(1)	(2)
Glossary of definitions	Annex A
Senior Management Arrangements, Systems and Controls sourcebook (SYSC)	Annex B
Client Assets sourcebook (CASS)	Annex C
Supervision manual (SUP)	Annex D

Notes

- E. In the Annexes to this instrument, the notes (indicated by “**Note:**” or “*Editor’s note:*”) are included for the convenience of readers but do not form part of the legislative text.

Citation

- F. This instrument may be cited as the Consumer Credit (Regulatory Reporting) (Amendment) (No 2) Instrument 2025.

By order of the Board
1 May 2025

Annex A**Amendments to the Glossary of definitions**

Insert the following new definition in the appropriate alphabetical position. The text is not underlined.

relevant ancillary credit firm a firm which has *permission* to carry on any of the following *regulated activities*:

- (a) *credit broking*;
- (b) *debt adjusting*;
- (c) *debt counselling*; or
- (d) *providing credit information services*.

Annex B

Amendments to the Senior Management Arrangements, Systems and Controls sourcebook (SYSC)

In this Annex, underlining indicates new text and striking through indicates deleted text.

1 Application and purpose

...

1.5 Significant SYSC firm

...

Definition of a significant SYSC firm

...

1.5.3 R ...

(4) “client money” means *client money* that a *firm* receives or holds in the course of, or in connection with, all of the *regulated activities* that it carries on:

(a) as set out in the ~~most recent client money and client asset report~~ relevant questions in a CCR009 return submitted to the *FCA* under *SUP* 16.12 (Integrated Regulatory Reporting); or

...

(5) “Assets belonging to its *clients*” means the assets to which the *custody rules* apply:

(a) as set out in the ~~most recent client money and client asset report~~ relevant questions in a CCR009 return submitted to the *FCA* under *SUP* 16.12 (Integrated Regulatory Reporting); or

...

...

Annex C

Amendments to the Client Assets sourcebook (CASS)

In this Annex, underlining indicates new text and striking through indicates deleted text.

11 Debt management client money chapter

...

11.2 Firm classification

...

Notification

11.2.4 R Once every calendar year, a *CASS debt management firm* must notify the *FCA*, in ~~writing~~ the relevant questions under a CCR009 return, of the information in (1), (2) or (3), as applicable, and the information in (4), in each case no later than the *day* specified in (1) to (4):

- (1) if it held *client money* in the previous calendar year, the highest total amount of *client money* held during the previous calendar year, notification of which must be made ~~no later than the fifteenth business day of January~~ within the first 40 business days of the calendar year; or
- (2) If it did not hold *client money* in the previous calendar year but at any point up to and including the fifteenth business day of January ~~first 40 business days of the calendar year~~ the *firm* projects that it will do so in the current calendar year, the highest total amount of *client money* that the *firm* projects that it will hold during the current calendar year, notification of which must be made ~~no later than the fifteenth business day of January~~ within the first 40 business days of the calendar year; or

...

...

11.3 Responsibility for CASS operational oversight

CASS small debt management firm other than a not-for-profit debt advice body

11.3.1 R (1) A *CASS small debt management firm*, other than a *not-for-profit debt advice body*, must allocate to a *director* or *senior manager* responsibility for:

...

- (c) completing and submitting ~~a CCR005 return responses to the relevant questions under a CCR009 return to the FCA~~ in accordance with SUP 16.12.29CR.

...

CASS small debt management firm that is a not-for-profit debt advice body

- 11.3.2 R A *CASS small debt management firm* that is a *not-for-profit debt advice body* must allocate to a *director* or *senior manager*:

...

- (3) completing and submitting a ~~CCR005 return~~ responses to the relevant questions under a CCR009 return to the FCA in accordance with SUP 16.12.29CR.

...

CASS large debt management firms

...

- 11.3.4 R A *CASS large debt management firm* must allocate to a *director* or *senior manager* the function of:

...

- (3) completing and submitting a ~~CCR005~~ responses to the relevant questions under a CCR009 return to the *FCA* in accordance with SUP 16.12.29CR.

...

Annex D

Amendments to the Supervision manual (SUP)

In this Annex, underlining indicates new text and striking through indicates deleted text, unless otherwise specified.

16 Reporting requirements

...

16.12 Integrated Regulatory Reporting

...

Regulated Activity Group 12

...

16.12.29 R The applicable *data items*, reporting frequencies and submission deadlines referred to in SUP 16.12.4R are set out in the table below. Reporting frequencies are calculated from a *firm's accounting reference date*, unless indicated otherwise. The due dates are the last day of the periods given in the table below following the relevant reporting frequency period.

C

Description of <i>data item</i>	<i>Data item</i> (note 1)	Frequency		Submission deadline
		Annual revenue from <i>credit-related regulated activities</i> up to and including £5 million (note 2)	Annual revenue from <i>credit-related regulated activities</i> over £5 million	
...				
Debt management (note 6)	CCR004	Annually	Half yearly	30 business days [deleted]
Client Money & Assets (note 7)	CCR005	Annually	Half yearly	30 business days [deleted]

...				
Credit broking websites (note 10)				[deleted]
<u>Relevant ancillary credit firm</u> (note 12)	<u>CCR009</u>	<u>Annually</u>	<u>Half yearly</u>	<u>40 business days</u>
Note 1	<p>When <u>Except in relation to data item CCR009, when submitting the required data item, a firm must use the format of the data item set out in SUP 16 Annex 38A. Guidance notes for the completion of the data items is data items are set out in SUP 16 Annex 38B. When submitting data item CCR009, a firm must use the format of the data item set out in SUP 16 Annex 38CR. Guidance notes for the completion of data item CCR009 are set out in SUP 16 Annex 38DG.</u></p>			
...				
Note 6	<p>(a) Subject to (b) to (d) below, this data item applies to a debt management firm and to a not-for-profit debt advice body that at any point in the last 12 months has held £1 million or more in client money or, as the case may be, projects that it will hold £1 million or more in client money in the next 12 months.</p> <p>(b) This data item does not apply to a firm with limited permission other than a not-for-profit debt advice body within (a).</p> <p>(c) This data item does not apply to a firm required to submit a Capital Adequacy data item from a RAG other than RAG 12, or under SUP 16.13, unless (d) applies</p> <p>(d) Where a firm is required to submit a Capital Adequacy data item from a RAG other than RAG 12 or under SUP 16.13 but the firm's highest capital requirement derives from its activity under RAG 12, the firm should submit both CCR004 and the Capital Adequacy data item required from the RAG other than RAG 12 or SUP 16.13. [deleted]</p>			
Note 7	<p>This data item applies to a CASS debt management firm, unless the firm is subject to a requirement imposed under section 55L of the Act stating that it must not hold client money, or such a requirement to the same effect. [deleted]</p>			
...				

Note 9	<p>...</p> <p>(c) This <i>data item</i> does not apply to a <i>not-for-profit debt advice body</i> that at any point in the last 12 <i>months</i> has held £1 million or more in <i>client money</i> or, as the case may be, projects that it will hold £1 million or more in <i>client money</i> in the next 12 <i>months</i>. Such a <i>not-for-profit debt advice body</i> is instead required to submit <i>data items</i> CCR001, CCR002, CCR004 and CCR005 and CCR009.</p>
...	
Note 11	[deleted]
Note 12	<p><u>(a) This <i>data item</i> applies to a <i>relevant ancillary credit firm</i>. The <i>data item</i> CCR009 can be found in SUP 16 Annex 38CR.</u></p> <p><u>(b) Reporting frequencies and reporting periods for this <i>data item</i> are calculated on a calendar year basis and not by reference to the <i>firm's accounting reference date</i>. The relevant half-years end on the last <i>business day</i> of June and December.</u></p> <p><u>(c) A <i>relevant ancillary credit firm</i> with annual revenue from <i>credit-related regulated activities</i> of £5 million or less must complete <i>data item</i> CCR009 by reference to the annual reporting period beginning on 1 January and ending on 31 December.</u></p> <p><u>(d) A <i>relevant ancillary credit firm</i> with annual revenue from <i>credit-related regulated activities</i> of more than £5 million must complete <i>data item</i> CCR009 twice a year.</u></p> <p><u>(e) The submissions that a <i>firm</i> in (d) must make are in respect of:</u></p> <p style="padding-left: 40px;"><u>(i) the 6-month period beginning on 1 January and ending on 30 June; and</u></p> <p style="padding-left: 40px;"><u>(ii) the annual reporting period beginning on 1 January and ending on 31 December.</u></p> <p><u>(f) The first reporting period for a <i>firm</i> which is a <i>relevant ancillary credit firm</i> as at 7 May 2025 or which becomes a <i>relevant ancillary credit firm</i> before 1 January 2026 (regardless of its annual revenues from <i>credit-related regulated activities</i>) is the annual period beginning on 1 January and ending on 31 December 2025.</u></p> <p><u>(g) The first reporting period for a <i>firm</i> which becomes a <i>relevant ancillary credit firm</i> on or after 1 January 2026 and on a date between 1 January and 30 June with annual revenue from <i>credit-related regulated activities</i> of £5 million</u></p>

	<p><u>or more is the 6-month period beginning on 1 January and ending on 30 June.</u></p> <p><u>(h) The first reporting period for a firm which becomes a relevant ancillary credit firm on or after 1 January 2026 and on a date between 1 January and 30 June with annual revenue from credit-related regulated activities of £5 million or less is the annual period beginning on 1 January and ending on 31 December.</u></p> <p><u>(i) The first reporting period for a firm which becomes a relevant ancillary credit firm on or after 1 January 2026 and on a date between 1 July and 31 December is the annual period beginning on 1 January and ending on 31 December.</u></p>
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...

16 **Data Items relating to Consumer Credit activities**
Annex
38A

This annex consists only of one or more forms. Forms are to be found through the following address:

[*Editor's note: insert link to form SUP 16 Annex 38A*]

...

CCR004 Consumer Credit data: Debt Management Firms [deleted]

A

- ~~1~~ Total value of relevant debts under management outstanding
- ~~2~~ Total prudential resources requirement
- ~~3~~ Total prudential resources
- ~~4~~ Number of debt management plans that end before the end of the term originally agreed

CCR005 Consumer Credit data: Client Money & Assets [deleted]

A

- ~~1~~ What was the highest balance of client money held at any one time during the reporting period?
- ~~2~~ What was the highest number of clients for whom money was held at any one time during the period?
- ~~3~~ How much client money (if any) did you hold in excess of 5 days following receipt?

...

16
Annex
38B

Notes for completion of Data Items relating to Consumer Credit activities

...

CCR004 – Consumer credit data: Debt management firms [deleted]

70. ~~This data item is intended to reflect the underlying prudential requirements contained in CONC 10 and allows monitoring against the requirements set out there. [deleted]~~
71. ~~A debt management firm is a firm which carries on the activity of debt counselling or debt adjusting with a view to an individual entering into a particular debt solution. This is not limited to firms which enter into debt management plans. [deleted]~~
72. ~~This data item must be completed in sterling and single units. [deleted]~~

Guide for the completion of individual fields

1A	Total value of relevant debts under management outstanding	<p>Firms should enter the total value of all the relevant debts under management that are used to calculate the firm's current prudential resources requirement. This should be the figure calculated at the latest accounting reference date, or, if there has been a change in the value of all the relevant debts under management of more than 15%, the re-calculated figure.</p> <p>See CONC 10.2.5R to CONC 10.2.10G and CONC 10.2.13R to CONC 10.2.14R.</p>
2A	Total prudential resources requirement	<p>Firms should enter whichever figure is higher out of:</p> <p>(a) £5000; and</p> <p>(b) the variable prudential resources requirement calculated based on the value of relevant debts under management outstanding entered in element 1A.</p>

		See <i>CONC 10.2.5R</i> , <i>CONC 10.2.8R</i> and <i>CONC 10.2.11G</i> to <i>10.2.12G</i> . NB: It is not permissible to answer '0' for this question, even if '0' was entered against 1A, as the minimum prudential resources requirement in <i>CONC 10</i> is £5,000.
3A	Total prudential resources	<i>Firms</i> should enter their total prudential resources, calculated in accordance with <i>CONC 10</i> .
4A	Number of debt management plans that end before the end of the term originally agreed	<i>Firms</i> should identify the number of <i>debt management plans</i> that ended earlier than stated in the original contract during the reporting period.

CCR005 – Consumer credit data: Client money and assets [deleted]

73. The purpose of this *data item* is so that the *FCA* has an understanding of how much *client money* and assets is being held by *CASS debt management firms* in relation to debt management activity. [deleted]
74. *Firms* that meet the definitions of *CASS debt management firm*, unless subject to a requirement imposed under section 55L of the *Act* stating that it must not hold *client money* or such a *requirement* to the same effect, should complete this *data item*. [deleted]

Guide for the completion of individual fields

1A	What was the highest balance of client money held during the reporting period?	A <i>CASS debt management firm</i> should enter the highest total amount of <i>client money</i> that was held in respect of debt management activity at a single point in time during the reporting period.
2A	What was the highest number of clients for whom client money was held during the reporting period?	A <i>CASS debt management firm</i> should enter the highest number of <i>clients</i> for whom <i>client money</i> was held in respect of debt management activity at a single point in time during the reporting period.

3A	How much client money (if any) did you hold in excess of five days following receipt?	<p>If a <i>CASS debt management firm</i>, at any point during the reporting period, held <i>client money</i> for an individual <i>client</i>, relating to a single transaction, in excess of five days of receipt of cleared funds, it should report the aggregate balance of this <i>client money</i> (i.e. the sum of all the amounts that were held longer than five days).</p> <p>A <i>CASS debt management firm</i> should report '0' if it did not hold <i>client money</i> in excess of five days at any point during the reporting period.</p> <p>In accordance with <i>CASS 11</i>, a <i>CASS debt management firm</i> must pay any <i>client money</i> it receives to creditors as soon as reasonably practicable, save in the circumstances set out in <i>CASS 11</i>. In the <i>FCA's</i> view the payment to creditors should normally be within five <i>business days</i> of the receipt of cleared funds.</p>
----	---	--

...

After SUP 16 Annex 38B (Notes for completion of Data Items relating to Consumer Credit activities), insert the following new annexes, SUP 16 Annex 38CR and SUP 16 Annex 38DG. The text is all new and is not underlined.

16 Annex 38CR Data item relating to relevant ancillary credit firms

The following *data elements* must be provided, where applicable, in relation to all relevant *credit related regulated activity*. When providing the *data elements*, *firms with appointed representatives* must provide consolidated data that includes the activities of both the *firm* itself as *principal* and the activities of its *appointed representatives*, unless otherwise stated below.

Unless stated below, your response should apply to the relevant reporting period as indicated in Note 12 under SUP 16.12.29CR.

In respect of the first reporting period for a *firm* which is a *relevant ancillary credit firm* as at 7 May 2025 only, if a *firm* does not have sufficient data to report for the entire period it must calculate an annualised figure based on actual data where possible. If the *data element* is a cumulative measure such as revenue/income, introductions made or commission received it must apply the formula:

$$A \times (12 \div B)$$

where:

A = the value or figure available; and

B = the number of *months* to which the value or figure relates.

CCR009 - Consumer credit data: relevant ancillary credit firm

Section 1: Reporting fields for a firm with permission to carry on the regulated activity of credit broking		
Section 1.1: Credit broking – permissions		
Tell us about your <i>permissions</i> . Some questions will only apply if you have not undertaken or do not intend to undertake any relevant <i>credit-related regulated activity</i> .		
Reference	Data element	Code (where applicable)
101A	Our systems show that you have the <i>credit broking permission</i> . Which of the following activities have	A - Introducing an <i>individual</i> to a prospective <i>lender</i> with a view to them entering into a <i>credit agreement</i> B - Introducing an <i>individual</i> to another <i>person</i> , with a view to that <i>person</i> entering into a <i>consumer hire agreement as owner</i>

	been undertaken using that <i>permission</i> ?	<p>C - Introducing an <i>individual</i> who wishes to enter into a <i>credit agreement</i> or <i>consumer hire agreement</i> to another <i>person</i> that carries on a <i>credit broking</i> activity under options (A) or (B)</p> <p>D - Charging a fee in relation to one of the <i>credit broking</i> activities described in article 36A(1)(d-f) of the <i>Regulated Activities Order</i> only and not options (A), (B) or (C) above</p> <p>E – Haven’t undertaken any activities in the past 12 months but expect to undertake activities in the next 12 months</p> <p>X - None of the above</p>
102A	Why do you hold your <i>credit broking permission</i> ?	<p>A - Applied to cancel <i>authorisation</i> or to vary <i>permission</i> to remove <i>credit broking</i></p> <p>B - Required to hold the <i>permission</i> as a provider of ‘home credit’ or ‘payday’ lending to comply with the Competition and Markets Authority Review of Home Credit Market Investigation Order 2007 (as amended) and Payday Lending Market Investigation Order 2015 (as amended) requirements to publish information on a price comparison website</p> <p>C - Hold <i>permission</i> at the request of a <i>lender</i> or <i>owner</i> in order to be on their panel</p> <p>D - Hold <i>permission</i> to in relation to <i>credit agreements</i> secured by a <i>legal or equitable mortgage</i> on <i>land</i> only and not any other <i>credit agreement</i> or <i>consumer hire agreement</i> eg, mortgage intermediaries</p> <p>W - Other reason</p>
103A	If you have selected ‘W - Other reason’, please specify why you have not used your <i>credit broking permission</i> .	[Free text]
104A	Do you engage in <i>credit broking</i> activity in respect of <i>individuals</i> who wish to enter into <i>credit agreements</i>	<p>A - <i>Credit broking</i> activity is solely in respect of agreements which are wholly or predominantly for business purposes</p> <p>B - <i>Credit broking</i> activity is mostly in respect of agreements which are wholly or predominantly for business purposes</p>

	or <i>consumer hire agreements</i> which are wholly or predominantly for the purposes of a business carried on, or intended to be carried on, by the <i>individual</i> ?	<p>C - <i>Credit broking</i> activity is sometimes in respect of agreements which are wholly or predominantly for business purposes</p> <p>D - <i>Credit broking</i> activity is never in respect of agreements which are wholly or predominantly for business purposes</p>
105A	Do you engage in <i>credit broking</i> activity in respect of any of the following types of financial product?	<p>A - <i>Finance</i> for specific <i>goods</i> or services other than insurance premiums</p> <p>B - <i>Finance</i> for insurance premiums</p> <p>C - <i>Credit agreements</i> secured on <i>land</i></p> <p>D - Cash loans</p> <p>E - Credit cards</p> <p>F - Overdrafts</p> <p>W - Any other <i>credit agreements</i></p>
<p>For the remainder of Section 1: Credit broking, do not include any activities undertaken, or intended to be undertaken, using the <i>credit broking</i> permission which relate to <i>credit agreements</i> secured by a <i>legal or equitable mortgage</i> on <i>land</i>.</p>		
<p>Section 1.2: Credit broking – credit agreements (apart from finance for specific goods and services other than insurance premiums)</p> <p>Tell us about the <i>credit agreements</i> in respect of which you act as a <i>credit broker</i>.</p>		
<p>Please provide us with the following information:</p> <ul style="list-style-type: none"> • 106B-W – Total number of introductions made by your firm (excluding activity of your <i>appointed representatives</i>, if you have any) • 107B-W – Total number of introductions made by <i>appointed representatives</i> of your firm <p>This information is to be provided for each type of <i>credit agreement</i> (apart from <i>finance</i> for specific <i>goods</i> and services other than insurance premiums) reported in 105A.</p>		

Section 1.3: Credit broking – goods and services

Tell us about the *goods* and services you broker *finance* for. This section only applies if you broker *finance* for *goods* and/or services.

Reference	Data element	Code (where applicable)
108A	Which of the following <i>goods</i> and services relate to your firm's engagement in <i>credit broking</i> activity?	A - <i>Goods</i> - Motor vehicles B - <i>Goods</i> - Mobility aids C - <i>Goods</i> - Home improvement D - <i>Goods</i> - Mobile phones E - <i>Goods</i> - Jewellery and watches F - <i>Goods</i> - Household goods G - <i>Goods</i> - Sports and leisure goods H - <i>Goods</i> - Mobile homes I - <i>Goods</i> - Tools J - <i>Goods</i> - Agriculture equipment and supplies K - <i>Goods</i> - Other plant machinery L - <i>Goods</i> - Office equipment M - <i>Goods</i> - Health care and medical care equipment N - <i>Goods</i> - Other O - <i>Services</i> - Health care and medical care P - <i>Services</i> - Education and training Q - <i>Services</i> - Travel R - <i>Services</i> - Membership and subscription fees

		S - Services - Other
109A	Does your firm supply any of the following <i>goods</i> to <i>individuals</i> , with a view to the purchase being made on <i>credit</i> ?	<p>A - Motor vehicles</p> <p>B - Mobility aids</p> <p>C - Home improvement</p> <p>D - Mobile phones</p> <p>E - Jewellery and watches</p> <p>F - Household <i>goods</i></p> <p>G - Sports and leisure <i>goods</i></p> <p>H - Mobile homes</p> <p>I - Tools</p> <p>J - Agriculture equipment and supplies</p> <p>K - Other plant machinery</p> <p>L - Office equipment</p> <p>M - Health care and medical care equipment</p> <p>W - Other</p> <p>X - Our firm does not supply <i>goods</i> to <i>individuals</i></p>
110A	Does your firm supply any of the following <i>services</i> to <i>individuals</i> , with a view to the purchase being made on <i>credit</i> ?	<p>A - Health care and medical care</p> <p>B - Education and training</p> <p>C - Travel</p> <p>D - Membership and subscription fees</p> <p>W - Other</p> <p>X - Our firm does not supply <i>services</i> to <i>individuals</i></p>

Section 1.3.1: Credit broking – motor vehicles		
This section only applies if your <i>credit broking</i> activity is related to motor vehicles.		
Reference	Data element	Code (where applicable)
111A	Which of the following types of vehicles do you arrange <i>finance</i> for?	A - Cars B - Mopeds, motorbikes or quad bikes C - Vans or light goods vehicles (up to 3.5t) D - Goods vehicles (3.5t to 7.5t) E - Heavy goods vehicles (over 7.5t) F - Motorhomes and campervans G - Buses H - Agricultural I - Construction W - Other
112A	What is the condition of vehicles you arrange <i>finance</i> for?	A - New B - Used Z - Unknown
113A	Which types of <i>finance</i> are available on the vehicles you arrange <i>finance</i> for?	A - Personal contract purchase (PCP) B - Hire-purchase (HP) C - Conditional sale D - Any other type of <i>credit</i> E - <i>Consumer</i> hire

<p>Section 1.3.2: Credit broking – motor vehicles on credit agreements</p> <p>Tell us about the vehicles you arrange <i>finance</i> for. This section only appears for <i>credit agreements</i> relating to motor vehicles.</p>		
<p>Please provide us with the following information:</p> <ul style="list-style-type: none"> • 114A-W – Total number of introductions made by your firm (excluding activity of your <i>appointed representatives</i>, if you have any) • 115A-W – Total number of introductions made by <i>appointed representatives</i> of your firm <p>This information is to be provided for the vehicle types reported in 111A.</p>		
<p>Section 1.3.3: Credit broking – motor vehicles on consumer hire agreements</p> <p>Tell us about the vehicles on which you arrange <i>consumer hire agreements</i>. This section only applies for hire agreements relating to motor vehicles.</p>		
<p>Please provide us with the following information:</p> <ul style="list-style-type: none"> • 116A-W – Total number of introductions made by your firm (excluding activity of your <i>appointed representatives</i>, if you have any) • 117A-W – Total number of introductions made by <i>appointed representatives</i> of your firm <p>This information is to be provided for the vehicle types reported in 111A.</p>		
<p>Section 1.4: Credit broking – general goods and services</p> <p>This section only appears if your <i>credit broking</i> activity is related to <i>goods</i> and services (apart from motor vehicles).</p>		
Reference	Data element	Code (where applicable)
118A	What types of <i>finance</i> are available on the <i>goods</i> and services you sell?	A - Hire purchase B - Conditional sale C - Any other <i>fixed-sum credit</i> D - <i>Running-account credit</i> E - Consumer hire

<p>Section 1.4.1: Credit broking – general goods and services on credit agreements</p> <p>Tell us about the <i>goods</i> or services you supply on <i>credit agreements</i>. This section only appears for <i>credit agreements</i> relating to <i>goods</i> and services (apart from motor vehicles).</p>		
<p>Please provide us with the following information:</p> <ul style="list-style-type: none"> • 119B-S – Total number of introductions made by your firm (excluding activity of your <i>appointed representatives</i>, if you have any) • 120B-S – Total number of introductions made by <i>appointed representatives</i> of your firm <p>This information is to be provided for the <i>goods</i> and services reported in 108A.</p>		
<p>Section 1.4.2: Credit broking – general goods and services on consumer hire agreements</p> <p>Tell us about the <i>goods</i> or service you supply on <i>consumer hire agreements</i>. This section only applies for hire agreements relating to <i>goods</i> and services (apart from motor vehicles).</p>		
<p>Please provide us with the following information:</p> <ul style="list-style-type: none"> • 121B-S – Total number of introductions made by your firm (excluding activity of your <i>appointed representatives</i>, if you have any) • 122B-S – Total number of introductions made by <i>appointed representatives</i> of your firm <p>This information is to be provided for the <i>goods</i> and services reported in 108A.</p>		
<p>Section 1.5: Credit broking – supplementary</p> <p>Tell us about any extras or add-ons which your firm sells in support of the main <i>goods</i> or service.</p>		
Reference	Data element	Code (where applicable)
123A	What extras or add-ons does your firm sell in support of the main <i>goods</i> or service, not included as part of the <i>credit agreement</i> or <i>consumer hire agreement</i> ?	<p>A - Regulated insurance product to cover <i>goods</i> or parts</p> <p>B - Non-regulated warranty or service product provided by the firm</p> <p>C - Non-regulated warranty or service product provided by a third party</p> <p>X - None of above</p>

124A	What extras or add-ons does your firm sell in support of the main <i>goods</i> or service, included as part of the <i>credit agreement</i> and <i>consumer hire agreements</i> ?	<p>A - Regulated insurance product to cover <i>goods</i> or parts</p> <p>B - Non-regulated warranty or service product provided by the firm</p> <p>C - Non-regulated warranty or service product provided by a third party</p> <p>X - None of above</p>
<p>Section 1.6: Credit broking – relationships with lenders, brokers and owners</p> <p>Tell us about the <i>lenders</i>, brokers and <i>owners</i> your firm introduces to.</p>		
Reference	Data element	Code (where applicable)
125A	Who does your firm engage with in relation to your <i>credit broking</i> activities to <i>individuals</i> for the purposes of obtaining <i>credit</i> ?	<p>A - <i>Lenders</i> unrelated to your firm</p> <p>B - <i>Lenders</i> within the same group</p> <p>C - Brokers unrelated to your firm</p> <p>D - Brokers within the same group</p> <p>E - <i>Owners</i> (consumer hire) unrelated to your firm</p> <p>F - <i>Owners</i> (consumer hire) within the same group</p> <p>G - None</p>
<p>Section 1.6.1: Credit broking – total introductions</p> <p>Tell us about the details of the introductions made by your firm (excluding activity by <i>appointed representatives</i>, if you have any).</p>		
<p>Please provide us with the following information:</p> <ul style="list-style-type: none"> • 126AA-FA – Total <i>credit broking</i> revenue • 126AB-FB – Total commission earned • 126AC-FC – Total fees from <i>individuals</i> • 126AD-FD – Other revenue received 		

- 126AE-FE – Total commission / merchant fees paid
- 126AF-FF – Total introductions

This information is to be provided in relation to the *lenders*, brokers and *owners* you engage with under 125A.

Section 1.6.2: Credit broking – total introductions via appointed representatives

Tell us about the *lenders*, *credit brokers* and *owners* to which *appointed representatives* of your firm introduce *individuals* on your behalf.

Please provide us with the following information:

- 127AA-FA – Total *credit broking* revenue
- 127AB-FB – Total commission earned
- 127AC-FC – Total fees from *individuals*
- 127AD-FD – Other revenue received
- 127AE-FE – Total commission / merchant fees paid
- 127AF-FF – Total introductions

This information is to be provided in relation to the *lenders*, brokers and *owners* your *appointed representatives* engage with under 125A.

Section 1.6.3: Credit broking – top 5 lenders

Tell us about the top 5 relationships with *lenders* by revenue. This section only applies if your firm has a relationship with one or more *lenders* for *credit broking* activities.

Where there is no revenue made, please enter the top 5 *lenders* by commission or merchant fee paid to them.

Please provide us with the following information (excluding activity of your *appointed representatives*, if you have any):

- 128A-132A – Name of *lender*
- 128B-132B – Firm reference number (if applicable)
- 128C-132C – Total introductions
- 128D-132D – Revenue
- 128E-132E – Commission / merchant fees paid

This information is to be provided in relation to the *lenders* you engage with under 125A.

Section 1.6.4: Credit broking – top 5 lenders via appointed representatives

Tell us about the top 5 relationships with *lenders* by revenue. This section only applies if *appointed representatives* of your *firm* have a relationship with one or more *lenders* for *credit broking* activities.

Where there is no revenue made, please enter the top 5 *lenders* by commission or merchant fee paid to them.

Please provide us with the following information (generated by activity of your appointed representatives):

- 133A-137A – Name of *lender*
- 133B-137B – Firm reference number (if applicable)
- 133C-137C – Total introductions
- 133D-137D – Revenue
- 133E-137E – Commission / merchant fees paid

This information is to be provided in relation to the *lenders* your *appointed representatives* engage with under 125A.

Section 1.6.5: Credit broking – top 5 brokers

Tell us about the top 5 relationships with *credit brokers* by revenue. This section only applies if your firm (excluding activity of your *appointed representatives*, if you have any) has a relationship with one or more *credit brokers* for *credit broking* activities.

Where there is no revenue made, please enter the top 5 *credit brokers* by commission or merchant fee paid to them.

Please provide us with the following information (excluding the activity of *appointed representatives*, if you have any):

- 138A-142A – Name of broker
- 138B-142B – Firm reference number (if applicable)
- 138C-142C – Total introductions
- 138D-142D – Revenue
- 138E-142E – Commission / merchant fees paid

This information is to be provided in relation to the brokers you engage with under 125A.

Section 1.6.6: Credit broking – top 5 brokers via appointed representatives

Tell us about the top 5 relationships with *credit brokers* by revenue. This section only applies if *appointed representatives* of your firm have a relationship with one or more *credit brokers* for *credit broking* activities carried out on your behalf.

Please provide us with the following information (generated by activity of your *appointed representatives*):

- 143A-147A – Name of broker
- 143B-147B – Firm reference number (if applicable)
- 143C-147C – Total introductions
- 143D-147D – Revenue
- 143E-147E – Commission / merchant fees paid

This information is to be provided in relation to the *credit brokers* you engage with under 125A.

Section 1.6.7: Credit broking – top 5 owners

Tell us about the top 5 relationships with *owners* by revenue. This section only applies if your firm (excluding the activity of *appointed representatives*, if you have any) has a relationship with one or more *owners* for *credit broking* activities.

Please provide us with the following information (excluding the activity of *appointed representatives*, if you have any):

- 148A-152A – Name of *owner*
- 148B-152B – Firm reference number (if applicable)
- 148C-152C – Total introductions
- 148D-152D – Revenue
- 148E-152E – Commission / merchant fees paid

This information is to be provided in relation to the *owners* you engage with under 125A.

Section 1.6.8: Credit broking – top 5 owners via appointed representatives

Tell us about the top 5 relationships with *owners* by revenue. This section only applies if *appointed representatives* of your firm have a relationship with one or more *owners* for *credit broking* activities.

Please provide us with the following information (in respect of activity generated by your *appointed representatives*):

- 153A-157A – Name of *owner*

- 153B-157B – Firm reference number (if applicable)
- 153C-157C – Total introductions
- 153D-157D – Revenue
- 153E-157E – Commission / merchant fees paid

This information is to be provided in relation to the *owners* you engage with under 125A.

Section 1.7: Credit broking – declines

Tell us about declines following an introduction.

Reference	Data element	Code (where applicable)
158A	Does your firm introduce <i>individuals</i> that a <i>lender</i> or <i>owner</i> has declined for <i>credit</i> to another <i>credit broker, lender</i> or <i>hirer</i> outside of your standard panel?	Yes/No

Section 1.8: Credit broking – firm remuneration

Tell us about how your firm is remunerated.

Reference	Data element	Code (where applicable)
159A	How is your firm remunerated for its <i>credit broking</i> activities?	A - Flat fee for click through B - Flat fee for introduction C - Flat fee for successful <i>credit agreement</i> entered D - Percentage of transaction value E - Fee received from the <i>individual</i>

		W - Other X - No remuneration Z - Not applicable
Section 1.8.1: Credit broking – revenue per channel		
Tell us about the breakdown of revenue per channel. This section only applies if your firm charges a fee for its <i>credit broking</i> activities.		
Reference	Data element	Code (where applicable)
160A-W	Please provide your firm’s revenue (excluding activity of your <i>appointed representatives</i> , if you have any) for each channel.	A - Flat fee for click through [Enter value] B - Flat fee for introduction [Enter value] C - Flat fee for successful <i>credit agreement</i> entered [Enter value] D - Percentage of transaction value [Enter value] E - Fee received from the <i>individual</i> [Enter value] W - Other [Enter value]
161A-W	Please provide your firm’s revenue (generated through activity of your <i>appointed representatives</i>) for each channel.	A - Flat fee for click through [Enter value] B - Flat fee for introduction [Enter value] C - Flat fee for successful <i>credit agreement</i> entered [Enter value] D - Percentage of transaction value [Enter value] E - Fee received from the <i>individual</i> [Enter value] W - Other [Enter value]
162A	Does your firm proactively notify <i>individuals</i> that you	A - Always B - Sometimes

	receive commission from the <i>lender</i> or <i>owner</i> ?	C - No D - Not applicable
163A	Does your firm proactively tell <i>individuals</i> the value (or percentage) of the commission you receive?	A - Always B - Sometimes C - No D - Not applicable
164A	When does your firm charge the <i>individual</i> fees for <i>credit broking finance</i> ?	A - On initial contact with the <i>individual</i> B - Following introduction to a <i>lender</i> C - Following introduction to another <i>credit broker</i> D - Once the <i>customer</i> has been presented with the <i>credit broker's</i> terms and conditions E - Following provision of advice/recommendation to the <i>customer</i> F - Following entry into a <i>credit agreement</i> W - Other
<p>Section 1.9: Credit broking – sales channels Tell us about your sales channels.</p>		
Reference	Data element	Code (where applicable)
165A	Which of the following channels have <i>individuals</i> used to purchase your products or services on <i>credit</i> ?	A - Online, including website and/or app B - Email C - Telephone D - At your own physical premises, such as a store or dealership E - In an <i>individual's</i> home or dwelling

		F - Other non-trade premises G - Lead generation activities
Section 1.9.1: Credit broking – comparison tool		
Tell us about your comparison tool		
166A	Does your firm offer personalised digital credit comparison tools to <i>individuals</i> ?	Yes/No
Section 1.9.2: Credit broking – inside the individual’s home		
167A	Do you demonstrate the <i>goods</i> or service inside the <i>individual’s</i> home?	Yes/No
168A	Do you provide a quote for <i>goods/services</i> while inside the <i>individual’s</i> home?	Yes/No
169A	Do sales take place inside the <i>individual’s</i> home?	Yes/No
Section 1.10: Credit broking – staff remuneration		
Tell us about your staff remuneration. Certain questions will only apply if staff earn commission.		
Reference	Data element	Code (where applicable)
170A	Are any of your staff involved with the selling of	Yes/No

	regulated financial products?	
171A	How are your sales staff remunerated in relation to your <i>regulated activities</i> ?	A - Regular salary B - Salary plus commission C - Commission only
172A-B	What is the average percentage split between your sales staff salaries versus commission?	Salary [%] Commission [%]
173A	How many FTE sales staff do you employ that can receive commission/direct remuneration in relation to your <i>regulated activities</i> ?	[Enter value]
174A	What is your firm's sales staff commission model?	A - Variable commission based on value of product B - Variable commission based on number of sales C - Fixed commission based on value of product D - Fixed commission based on number of sales E - Flat fee W - Other
175A	Do your sales staff earn commission on the sale of <i>goods</i> or services?	Yes/No

176A	Do your sales staff earn commission on <i>finance</i> agreements?	Yes/No
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Section 2: Reporting fields for a firm with permission to carry on the regulated activities of debt adjusting and/or debt counselling

Section 2.1: Debt adjusting and/or debt counselling – permissions

Tell us about your *permissions*. Certain questions will only apply if you have not undertaken or do not intend to undertake any relevant *credit-related regulated activities*.

Reference	Data element	Code (where applicable)
201A	Our systems show that you have the <i>debt adjusting</i> and/or <i>debt counselling permission(s)</i> . Which of the following activities have you undertaken in relation to debts due under a <i>credit agreement</i> or a <i>consumer hire agreement</i> ?	<p>A - Negotiating with the <i>lender</i> or <i>owner</i>, on behalf of the <i>borrower</i> or <i>hirer</i>, terms for the discharge of a debt</p> <p>B - Taking over, in return for payments by the <i>borrower</i> or <i>hirer</i>, the <i>borrower</i> or <i>hirer's</i> obligation to discharge a debt</p> <p>C - Any similar activity to (a) or (b) above concerned with the liquidation of debt</p> <p>D - Giving advice to a <i>borrower</i> or <i>hirer</i> about the liquidation of a debt due</p> <p>E - For activities (a) to (d) – hold the <i>permissions</i> solely for the purpose of full or partial settlement of <i>credit agreements</i> in respect of motor vehicles or other <i>goods</i> – eg, part exchange of vehicle</p> <p>F - For activities (a) to (d) – hold the <i>permissions</i> solely for the purpose of providing <i>debt counselling</i> in connection with <i>investment</i> advice, mortgage advice, or the whole or partial settlement of <i>credit agreements</i> to <i>finance</i> insurance premiums</p> <p>G – Haven't undertaken any activities in the past 12 months but expect to undertake activities in the next 12 months</p> <p>X - None of the above</p>

202A	Why have do you hold <i>debt adjusting</i> and/or <i>debt counselling permission</i> ?	A - Applied to cancel <i>authorisation</i> or to vary <i>permission</i> to remove <i>debt adjusting</i> and/or <i>debt counselling</i> W - Other reason
203A	If you have selected “W - Other reason”, then please specify why have you not used your <i>permission</i> ?	[Free text]
For the remainder of Section 2: Debt adjusting and/or debt counselling, do not include any activities undertaken, or intended to be undertaken, using the <i>debt adjusting</i> and/or <i>debt counselling</i> permission which are in connection with <i>investment advice</i> , mortgage advice, or the whole or partial settlement of <i>credit agreements</i> to <i>finance</i> insurance premiums.		
Section 2.2: Debt adjusting and/or debt counselling – business model Tell us about your business model.		
Reference	Data element	Code (where applicable)
204A	Are you a <i>firm</i> that offers money/debt advice and/or provides <i>debt solutions</i> ?	A - Money/debt advice only B - Money/debt advice and <i>debt solutions</i> , in which the <i>debt solution</i> is provided by your firm C - Money/debt advice and <i>debt solutions</i> , in which the <i>debt solution</i> is provided by another <i>firm</i> D - Debt advice and <i>debt solutions</i> , in which the <i>debt solution</i> is provided by your firm or by another <i>firm</i> (ie, a combination of (b) and (c)) X - None of the above
Section 2.3: Debt adjusting and/or debt counselling – fees and revenues Tell us about your fees and revenues. Certain questions will only apply if there is a fee charged to <i>individuals</i> .		

Reference	Data element	Code (where applicable)
205A	What are the different types of money/debt advice that your firm offers?	A - Advice on expenditure (eg, money management/budgeting) B - Advice on income (eg, welfare benefits) C - Unregulated debts (eg, council tax, utilities) D - Regulated debts (eg, personal loans, mortgages) E - Advice on debt solution W - Other
206A	Are <i>individuals</i> charged a fee for money/debt advice that your firm offers?	Yes/No
207A	Do you charge a standalone fee for money/debt advice?	Yes/No
208A	Do you charge a subscription fee for money/debt advice?	Yes/No
209A-W	Total revenue of fees and commission per money/debt advice type for your firm (excluding activity of your <i>appointed representatives</i> , if you have any)	A - Advice on expenditure (eg, money management/budgeting) [Enter value] B - Advice on income (eg, welfare benefits) [Enter value] C - Unregulated debts (eg, council tax, utilities) [Enter value] D - Regulated debts (eg, personal loans, mortgages) [Enter value] E - Advice on <i>debt solution</i> [Enter value] W - Other [Enter value]
210A-W	Total revenue of fees and commission per money/debt	A - Advice on expenditure (eg, money management/budgeting) [Enter value]

	advice type generated by <i>appointed representatives</i> of your firm	B - Advice on income (eg, welfare benefits) C - Unregulated debts (eg, council tax, utilities) D - Regulated debts (eg, personal loans, mortgages) E - Advice on <i>debt solution</i> W - Other	[Enter value] [Enter value] [Enter value] [Enter value] [Enter value]
Section 2.4: Debt adjusting and/or debt counselling – debt advice/solutions			
Tell us about the <i>debt solutions</i> you provide.			
Reference	Data element	Code (where applicable)	
211A	Total number of your firm's <i>customers</i> (including new and existing) (excluding activity of your <i>appointed representatives</i> , if you have any)	[Enter value]	
212A	Total number of <i>customers</i> (including new and existing) generated by activity of your <i>appointed representatives</i>	[Enter value]	
213A	Total number of your firm's <i>customers</i> (excluding activity of your <i>appointed representatives</i> , if you have any) who received money/debt advice and did not take up a <i>debt solution</i>	[Enter value]	

214A	Total number of your firm's <i>customers</i> (generated by activity of your <i>appointed representatives</i>) who received money/debt advice and did not take up a <i>debt solution</i>	[Enter value]
215A	Total number of your firm's <i>customers</i> (excluding activity of your <i>appointed representatives</i> , if you have any) who received money/debt advice and took up a <i>debt solution</i>	[Enter value]
216A	Total number of your firm's <i>customers</i> (generated by activity of your <i>appointed representatives</i>) who received money/debt advice and took up a <i>debt solution</i>	[Enter value]
217A	Total number of your firm's <i>customers</i> (excluding activity of your <i>appointed representatives</i> , if you have any) who received money/debt advice and were not offered a <i>debt solution</i>	[Enter value]

218A	Total number of your firm’s <i>customers</i> (generated by activity of your <i>appointed representatives</i>) who received money/debt advice and were not offered a <i>debt solution</i>	[Enter value]
219A	Total number of your firm’s <i>customers</i> (excluding activity of your <i>appointed representatives</i> , if you have any) who received money/debt advice and were referred to a <i>debt solution</i> that was offered by another <i>firm</i>	[Enter value]
220A	Total number of your firm’s <i>customers</i> (generated by activity of your <i>appointed representatives</i>) who received money/debt advice and were referred to a <i>debt solution</i> that was offered by another <i>firm</i>	[Enter value]
Section 2.4.1: Debt solutions offered and administered by your firm		
Reference	Data element	Code (where applicable)

<p>221A</p>	<p>What are the different types of <i>debt solutions</i> that your firm offers, in which the <i>debt solution</i> is administered by your firm?</p>	<p>A - <i>Debt management plans</i> B - Individual voluntary arrangements (IVAs) C - Debt consolidation loan D - Token payment plans E - Equity release F - Budgeting arrangements G - Debt relief order H - Other I - Scotland only – Debt arrangement scheme J - Scotland only – Minimal assets process (MAP) K - Scotland only – Protected trust deed L - Scotland only – Sequestration M - Scotland only – Other</p>
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Please provide us with the following information:

- 222A-M – Total revenue for your firm (excluding activity of your *appointed representatives*, if you have any) of commission per *debt solution*
- 223A-M – Total up-front fees for your firm (excluding activity of your *appointed representatives*, if you have any) per *debt solution*
- 224A-M – Total ongoing fees for your firm (excluding activity of your *appointed representatives*, if you have any) per *debt solution*
- 225A-M – Total number of *debt solutions* (excluding activity of your *appointed representatives*, if you have any) per solution type

This information is to be provided for the *debt solutions* reported in 221A.

Section 2.4.2: Debt solutions offered and administered by your firm via appointed representative

Please provide us with the following information:

- 226A-M – Total revenue for your firm (generated by activity of your *appointed representatives*) of commission per *debt solution*
- 227A-M – Total up-front fees for your firm (generated by activity of your *appointed representatives*) per *debt solution*
- 228A-M – Total ongoing fees for your firm (generated by activity of your *appointed representatives*) per *debt solution*
- 229A-M – Total number of *debt solutions* (generated by activity of your *appointed representatives*) per *debt solution* type

This information is to be provided for the *debt solution* reported in 221A.

Section 2.4.3: Debt solutions offered by your firm but administered by another firm

Reference	Data element	Code (where applicable)
230A	What are the different types of <i>debt solutions</i> that your firm offers, in which the <i>debt solution</i> is administered by another <i>firm</i> ?	A - <i>Debt management plans</i> B - Individual voluntary arrangements (IVAs) C – Debt consolidation loan D - Token payment plans E - Equity release F - Budgeting arrangements G - Debt relief order H - Other I - Scotland only – Debt arrangement scheme J - Scotland only – Minimal assets process (MAP) K - Scotland only – Protected trust deed L - Scotland only – Sequestration M - Scotland only – Other

Please provide us with the following information:

- 231A-M – Total revenue for your firm (excluding activity of your *appointed representatives*, if you have any) of fees or commission per *debt solution*
- 232A-M – Total number of *debt solutions* (excluding activity of your *appointed representatives*, if you have any) per solution type

This information is to be provided for the *debt solution* reported in 230A.

Section 2.4.4: Debt solutions offered by your firm but administered by another firm via appointed representative

Please provide us with the following information:

- 233A-M – Total revenue (generated by activity of your *appointed representatives*) of fees or commission per *debt solution*
- 234A-M – Total number of *debt solutions* (generated by activity of your *appointed representatives*) per solution type

This information is to be provided for the *debt solutions* reported in 230A.

Section 2.4.5: Debt management plans

Tell us about your *debt management plans*

Reference	Data element	Code (where applicable)
235A	Total number of <i>debt management plans</i> (excluding plans entered into through activity of your firm’s <i>appointed representatives</i> , if you have any) broken within 6 <i>months</i> of being entered into	[Enter value]
236A	Total number of <i>debt management plans</i> (excluding plans entered into through activity of your firm’s <i>appointed</i>	[Enter value]

	<i>representatives</i> , if you have any) broken between 6 and 12 <i>months</i> of being entered into	
237A	Total number of <i>debt management plans</i> (excluding plans entered into through activity of your firm's <i>appointed representatives</i> , if you have any) being administered at the end of the reporting period	[Enter value]
Section 2.4.6: Debt management plans via appointed representatives Tell us about your <i>debt management plans</i>		
Reference	Data element	Code (where applicable)
238A	Total number of <i>debt management plans</i> (generated by activity of your <i>appointed representatives</i>) broken within 6 <i>months</i> of being entered into	[Enter value]
239A	Total number of <i>debt management plans</i> (generated by activity of your <i>appointed</i>	[Enter value]

	<i>representatives</i>) broken between 6 to 12 <i>months</i> of being entered into	
240A	Total number of <i>debt management plans</i> (generated by activity of your <i>appointed representatives</i>) being administered at the end of the reporting period	[Enter value]
Section 2.5: Debt adjusting and/or debt counselling – charity and not-for-profit-body Tell us if you are a <i>charity</i> or <i>not-for-profit body</i> .		
Reference	Data element	Code (where applicable)
241A	Are you a <i>charity</i> or <i>not-for-profit body</i> ?	Yes/No
Section 2.6: Debt adjusting and/or debt counselling – funding source Tell us about your funding source.		
Reference	Data element	Code (where applicable)
242A	Where do you receive funding from?	A - Government department B - Money and Pensions Service (directly or as part of a supply chain) C - Government sponsored body other than Money and Pensions Service D - Private companies (including donations) E - Fair-share contributions

		<p>F - General public donations</p> <p>G - Other charities and/or <i>not-for-profit bodies</i></p> <p>H - Internal revenue generation – eg, merchandise sales, referral fee</p> <p>I - Network – funding received as part of a debt advice network</p> <p>W - Other</p>
243A-W	What is the amount of funding received per source?	<p>A - Government department [Enter value]</p> <p>B - Money and Pensions Service (directly or as part of a supply chain) [Enter value]</p> <p>C - Government sponsored body other than Money and Pensions Service [Enter value]</p> <p>D - Private companies (including donations) [Enter value]</p> <p>E - Fair share contributions [Enter value]</p> <p>F - General public donations [Enter value]</p> <p>G - Other charities and/or <i>not-for-profit bodies</i> [Enter value]</p> <p>H - Internal revenue generation, eg, merchandise sales, referral fee [Enter value]</p> <p>I - Network – funding received as part of a debt advice network [Enter value]</p> <p>W - Other [Enter value]</p>
<p>Section 2.7: Debt adjusting and/or debt counselling – network</p> <p>Tell us about your network.</p>		
Reference	Data element	Code (where applicable)
244A	Are you part of a network?	<p>A - Citizens Advice</p> <p>B - Community Money Advice</p> <p>C - Advice UK</p>

		D - Law centre W - Other X - Not part of any network
Section 2.8: Debt adjusting and/or debt counselling – engagement with individuals		
Tell us about how you engage with <i>individuals</i> .		
Reference	Data element	Code (where applicable)
245A	How do you engage with <i>individuals</i> ?	A - Website B - Live/web chat C - Chatbot D - Email E - Online / digital advice tool F - Instant messaging (eg, WhatsApp) G - Video conferencing or chat H - Telephone I - SMS J - Your own physical premises K - <i>Individual's</i> home or dwelling L - Other non-trade premises
Section 2.8.1 Debt adjusting and/or debt counselling – contact centre		
Tell us about your contact centre. Certain questions will only apply if your firm has a contact centre.		
Reference	Data element	Code (where applicable)

246A	Do you have a contact centre?	A - Yes, and we collect data / Management Information (“MI”) B - Yes, but we do not collect data / MI C - No
247A	How many inbound calls are received?	[Enter value]
248A	How many inbound calls are dropped?	[Enter value]
249A	How many inbound calls are answered?	[Enter value]
250A	What is the total wait time for inbound calls (seconds)?	[Enter value]
251A	What is the average call waiting time (seconds)?	[Enter value]
Section 2.8.2: Debt adjusting and/or debt counselling – web chat		
Tell us about your web chat demand. Certain questions will only apply if your firm has web chat as a method of engagement.		
Reference	Data element	Code (where applicable)
252A	Number of web chat enquiries	[Enter value]
253A	Number of web chat enquires that have been resolved	[Enter value]

254A	Number of webchat enquiries that have been abandoned	[Enter value]
Section 2.8.3: Debt adjusting and/or debt counselling – chatbot Tell us about your chatbot demand. Certain questions will only apply if your firm has a chat bot as a method of engagement.		
Reference	Data element	Code (where applicable)
255A	Number of chatbot enquiries that went on to involve a human agent	[Enter value]
256A	Number of chatbot enquiries that led to a resolution without speaking to a human agent	[Enter value]
257A	Number of chatbot enquiries that were abandoned	[Enter value]
Section 2.9: Debt adjusting and/or debt counselling – referrals Tell us about your referrals.		
Reference	Data element	Code (where applicable)
258A	How are <i>individuals</i> referred to your firm?	A - Government body B - Local council C - Credit card provider D - Utility provider

		<p>E - Referral from an <i>appointed representative</i> of the reporting firm</p> <p>F - Internal referral from another firm in same group structure</p> <p>G - Other regulated <i>firms</i></p> <p>H - Self-referral, eg, in which <i>individuals</i> refer themselves to your firm</p> <p>W - Other</p> <p>Z - Unknown</p>
259A-Z	Total referrals to your firm per referral source type	<p>A - Government body [Enter value]</p> <p>B - Local council [Enter value]</p> <p>C - Credit card provider [Enter value]</p> <p>D - Utility provider [Enter value]</p> <p>E - Referral from an <i>appointed representative</i> of the reporting firm [Enter value]</p> <p>F - Internal referral from another firm in same group structure [Enter value]</p> <p>G - Other regulated <i>firms</i> [Enter value]</p> <p>H - Self-referral, eg, in which <i>individuals</i> refer themselves to your firm [Enter value]</p> <p>W - Other [Enter value]</p> <p>Z - Unknown [Enter value]</p>
260A	How are <i>individuals</i> referred to <i>appointed representatives</i> of your firm?	<p>A - Government body</p> <p>B - Local council</p> <p>C - Credit card provider</p> <p>D - Utility provider</p> <p>F - Internal referral from another <i>firm</i> in same group structure</p> <p>G - Other regulated <i>firms</i></p>

		H - Self-referral, eg, in which <i>individuals</i> refer themselves to your firm W - Other Z - Unknown	
261A-Z	Total referrals to <i>appointed representatives</i> of your firm per referral source type	A - Government body B - Local council C - Credit card provider D - Utility provider F - Internal referral from another firm in same group structure G - Other regulated <i>firms</i> H - Self-referral, eg, in which <i>individuals</i> refer themselves to your firm W - Other Z - Unknown	[Enter value] [Enter value] [Enter value] [Enter value] [Enter value] [Enter value] [Enter value] [Enter value]
Section 2.10: Debt adjusting and/or debt counselling – staff			
Tell us about your staff. Certain questions will only apply if your staff earn a commission.			
Reference	Data element	Code (where applicable)	
262A	Do you have <i>customer</i> -facing advisors?	Yes/No	
263A	What is the employment status of the <i>customer</i> -facing advisors in your firm?	A - Full time employed B - Part time employed C - Volunteer W - Other	

264A	How many full-time equivalent (FTE) <i>customer-facing</i> advisors do you employ?	[Enter value]
265A	How are your <i>customer-facing</i> advisors remunerated?	A - Regular salary B - Salary plus commission C - Commission only
266A-B	What is the average percentage split between your <i>customer-facing</i> advisors' salaries and commission?	Salary [%] Commission [%]
267A	Do your <i>customer-facing</i> advisors earn commission when an <i>individual</i> enters a <i>debt solution</i> ?	Yes/No
268A	How many <i>customer-facing</i> advisors volunteer with your firm?	[Enter value]
<p>Section 2.11: Debt adjusting and/or debt counselling – settlements Tell us about your settlements.</p>		
Reference	Data element	Code (where applicable)
269A	Total number of settlements made by your firm	[Enter value]

	(excluding activity of your <i>appointed representatives</i> , if you have any) involving a part-exchange of a vehicle or <i>goods on finance</i>	
270A	Total value of all settlements made by your firm (excluding activity of your <i>appointed representatives</i> , if you have any) involving a part-exchange of a vehicle or <i>goods on finance</i>	[Enter value]
Section 2.13.1: Debt adjusting and/or debt counselling – settlements via appointed representatives		
Reference	Data element	Code (where applicable)
271A	Total number of settlements made by <i>appointed representatives</i> of your firm involving a part-exchange of a vehicle or <i>goods on finance</i>	[Enter value]
272A	Total value of all settlements made by <i>appointed representatives</i> of your firm involving a part-exchange of a vehicle or <i>goods on finance</i>	[Enter value]
Section 2.12: Debt adjusting and/or debt counselling – prudential		
Tell us about your prudential information.		

Reference	Data element	Code (where applicable)
273A	Total value of <i>relevant debts under management</i> that are outstanding	[Enter value]
274A	Total prudential resources requirement	[Enter value]
275A	Total prudential resources	[Enter value]
Section 2.13: Debt adjusting and/or debt counselling – client money Tell us about your firm's <i>regulated activity</i> in relation to client money.		
Reference	Data element	Code (where applicable)
276A	Select the option which describes your firm's <i>regulated activity</i> in relation to client money	A - The reporting firm's activity in relation to client money is for <i>debt management activity</i> only B - The reporting firm's activity in relation to client money includes, but is not limited to, <i>debt management activity</i> C - The reporting firm's activity in relation to client money does not include <i>debt management activity</i> D - The reporting firm does not carry out any <i>regulated activity</i> in relation to client money E - The reporting firm is unable to determine whether it carries out any <i>regulated activity</i> in relation to client money
277A	What was the balance of client money held as at the reporting period end?	[Enter value]

278A	What was the highest total amount of client money held during the reporting period?	[Enter value]								
279A	If the firm did not hold client money during the reporting period, please project what the firm will hold for the next calendar year	[Enter value]								
280A	What is your 'CASS debt management firm type' classification?	A - CASS large debt management firm B - CASS small debt management firm								
281A	What was the highest number of <i>clients</i> for whom client money was held at any one time during the reporting period?	[Enter value]								
282A-D	What was the balance of unallocated client money held as at the reporting period end which has remained unallocated for a period of 6 <i>business days</i> or more?	<table border="0"> <tr> <td data-bbox="801 940 1093 975">A - 6-29 days</td> <td data-bbox="1093 940 2045 975">[Enter value]</td> </tr> <tr> <td data-bbox="801 991 1093 1026">B - 30-59 days</td> <td data-bbox="1093 991 2045 1026">[Enter value]</td> </tr> <tr> <td data-bbox="801 1042 1093 1077">C - 60-90 days</td> <td data-bbox="1093 1042 2045 1077">[Enter value]</td> </tr> <tr> <td data-bbox="801 1093 1093 1128">D - 90+ days</td> <td data-bbox="1093 1093 2045 1128">[Enter value]</td> </tr> </table>	A - 6-29 days	[Enter value]	B - 30-59 days	[Enter value]	C - 60-90 days	[Enter value]	D - 90+ days	[Enter value]
A - 6-29 days	[Enter value]									
B - 30-59 days	[Enter value]									
C - 60-90 days	[Enter value]									
D - 90+ days	[Enter value]									

Section 3: Reporting fields for a firm with *permission* to carry on the regulated activity of providing credit information services

Section 3.1: Providing credit information services – permissions

Tell us about your <i>permissions</i> .		
Reference	Data element	Code (where applicable)
301A	Our systems show that you have <i>permission</i> for <i>providing credit information services</i> . Which of the following activities have you undertaken?	<p>A - Checking whether a <i>credit information agency</i> holds information on behalf of an <i>individual</i></p> <p>B - Considering the content of the information about an <i>individual</i> from a <i>credit information agency</i></p> <p>C - Taking steps leading to the modification of information about an <i>individual</i> that a <i>credit information agency</i> holds</p> <p>D - Taking steps to stop a <i>credit information agency</i> holding information about an <i>individual</i> or passing such information onto others</p> <p>E - Giving advice to an <i>individual</i> about any of the above</p> <p>X - None of the above</p>
302A	Why do you hold <i>providing credit information services permission</i> ?	<p>A - Applied to cancel <i>authorisation</i> or to vary <i>permission</i> to remove <i>providing credit information services</i></p> <p>B - Hold the permission solely for the purpose of providing credit information that my own firm holds on the individual</p> <p>C - Hold the permission to operate an electronic system in relation to lending under Article 36H of the Regulated Activities Order (RAO)</p> <p>D - Haven't undertaken any activities in the past 12 months but expect to undertake activities in the next 12 months</p> <p>W - Other reason</p>
303A	If you have selected 'W – Other reason', please specify why you have not used your <i>permission</i>	[Free text]

304A	In the past 12 <i>months</i> , where have you got <i>credit information</i> from?	A - Equifax B - Experian C - TransUnion D - Other credit reference agency (CRA) not listed above E - <i>Lenders</i> F - Other <i>credit information agency</i> G - Open Banking data
Section 3.2: Providing credit information services – fee model		
Reference	Data element	Code (where applicable)
305A	Do you charge a fee for getting <i>credit information</i> on behalf of an <i>individual</i> ?	A - Yes, there is a standalone fee for getting the information B - Yes, there is a subscription fee that includes this service C - No, the service is offered free of charge
Section 3.2.1: Providing credit information services – standalone fees		
Tell us about the standalone fees you charge for <i>providing credit information services</i> on to an <i>individual</i> .		
Reference	Data element	Code (where applicable)
306A	Fee charged per <i>individual</i> (excluding activity of your <i>appointed representatives</i> , if you have any)	[Enter value]
307A	Total number of <i>individuals</i> charged a fee (excluding	[Enter value]

	activity of your <i>appointed representatives</i> , if you have any)	
308A	Total revenue from fees (excluding activity of your <i>appointed representatives</i> , if you have any)	[Enter value]
309A	Fee charged per <i>individual</i> (generated by activity of your <i>appointed representatives</i>)	[Enter value]
310A	Total number of <i>individuals</i> charged a fee (generated by activity of your <i>appointed representatives</i>)	[Enter value]
311A	Total revenue from fees (generated by activity of your <i>appointed representatives</i>)	[Enter value]
Section 3.2.2: Providing credit information services – subscription fees		
Tell us about the subscription fees you charge for <i>providing credit information services</i> to an <i>individual</i> .		
Reference	Data element	Code (where applicable)
312A	What subscription terms do you (excluding activity of your <i>appointed</i>	A - Weekly B - Monthly

	<i>representatives, if you have any) offer?</i>	C - Annually W - Other
313A-W	What are the subscription fees for each of the subscription terms (excluding activity of your <i>appointed representatives, if you have any</i>)?	A - Weekly [Enter value] B - Monthly [Enter value] C - Annually [Enter value] W - Other [Enter value]
314A	What subscription terms do you (generated by activity of your <i>appointed representatives</i>) offer?	A - Weekly B - Monthly C - Annually W - Other
315A-W	What are the subscription fees for each of the subscription terms (generated by activity of your <i>appointed representatives</i>)?	A - Weekly [Enter value] B - Monthly [Enter value] C - Annually [Enter value] W - Other [Enter value]
<p>Section 3.3: Providing credit information services – subscriptions</p> <p>Tell us about your <i>customers</i> and their interaction with your subscription models.</p>		
Reference	Data element	Code (where applicable)
316A	How many <i>individuals</i> signed up to a subscription (excluding activity of your	[Enter value]

	<i>appointed representatives, if you have any)?</i>	
317A	How many <i>individuals</i> have cancelled a subscription (excluding activity of your <i>appointed representatives, if you have any)?</i>	[Enter value]
318A	What is the total revenue made from subscriptions (excluding activity of your <i>appointed representatives, if you have any)?</i>	[Enter value]
319A	What is the average duration of a subscription before it is cancelled (excluding activity of your <i>appointed representatives, if you have any)?</i>	[Enter value]
320A	How many <i>individuals</i> signed up to a subscription (generated by activity of your <i>appointed representatives)?</i>	[Enter value]
321A	How many <i>individuals</i> have cancelled a subscription (generated by activity of	[Enter value]

	your <i>appointed representatives</i>)?	
322A	What is the total revenue made from subscriptions (generated by activity of your <i>appointed representatives</i>)?	[Enter value]
323A	What is the average duration of a subscription before it is cancelled (generated by activity of your <i>appointed representatives</i>)?	[Enter value]
<p>Section 3.3.1: Providing credit information services – subscription cancellations Tell us about your subscription cancellations.</p>		
Reference	Data element	Code (where applicable)
324A	Are <i>individuals</i> able to cancel their subscription term early?	Yes/No
325A	Do you charge a cancellation fee?	Yes/No
326A	How much is the cancellation fee?	[Enter value]
<p>Section 3.4: Providing credit information services – business model Tell us about your business model.</p>		

Reference	Data element	Code (where applicable)
327A	Do you collect the information in order to give wider financial advice (eg, as part of your role as a mortgage or financial adviser)?	Yes/No
328A	Do you collect the information in order to undertake regulated debt advice (eg, as part of offering <i>debt counselling</i> and/or <i>debt adjusting</i> services)?	Yes/No
Section 3.5: Providing credit information services – credit score Please provide us with information in relation to your services and credit scores.		
Reference	Data element	Code (where applicable)
329A	Do you collect the information to give general advice on how an <i>individual</i> should improve their credit score (eg, sign up to the electoral roll)?	Yes/No
330A	Do you collect the information to tailor the advice on how an <i>individual</i>	Yes/No

	should improve their credit score?	
331A	In your marketing, do you advertise that you can improve an <i>individual's</i> credit score?	Yes/No
332A	What is the total number of <i>individuals</i> you track credit scores for (excluding activity of your <i>appointed representatives</i> , if you have any)?	[Enter value]
333A	What is the total number of <i>individuals</i> you track credit scores for (generated by activity of your <i>appointed representatives</i>)?	[Enter value]
334A	Of the <i>individuals</i> you track credit scores for, how many <i>individuals</i> have had an improved score after using your services (excluding activity of your <i>appointed representatives</i> , if you have any)?	[Enter value]
335A	Of the <i>individuals</i> you track credit scores for, how many have had an improved score	[Enter value]

	after using your services (generated by activity of your <i>appointed representatives</i>)?	
Section 3.6: Providing credit information services – tailoring advice		
Tell us about how you tailor your advice.		
Reference	Data element	Code (where applicable)
336A	Do you tailor the advice per <i>individual</i> ?	Yes/No
337A	Do you tailor the advice based on an <i>individual's</i> credit score?	Yes/No
338A	Do you utilise the <i>credit information</i> to provide tailored introductions to <i>lenders</i> (eg, to offer price comparison services or other <i>credit broking</i> activities)?	Yes/No
339A	Do you tailor the list of <i>lenders/credit brokers</i> based on credit score?	Yes/No
340A	Do you rank credit facilities in order of <i>lenders</i> that provide the highest value commissions?	Yes/No

341A	What is the total number of <i>individuals</i> who have gone on to take out <i>credit</i> based on a referral via your firm (excluding activity of your <i>appointed representatives</i> , if you have any)?	[Enter value]
342A	What is the total number of <i>individuals</i> who have gone on to take out <i>credit</i> based on a referral via your firm (generated by activity of your <i>appointed representatives</i>)?	[Enter value]

Section 4: Reporting fields for a relevant ancillary credit firm		
Section 4.1: Relevant ancillary credit firm – marketing Tell us about your firm’s marketing.		
Reference	Data element	Code (where applicable)
401A	Which of the following channels does your firm use for marketing?	A - Online B - Email C - Telephone D - Social media E - Door-to-door

		F - Traditional media (TV, radio, print) G - Outdoor advertising X - None of the above
Section 4.2: Relevant ancillary credit firm – revenues		
Tell us about your firm’s revenues.		
402A-C	Total revenue from your firm’s <i>credit-related regulated activities</i> (excluding activity of your <i>appointed representatives</i> , if you have any)	A - <i>Credit broking</i> [Enter value] B - <i>Debt adjusting and debt counselling</i> [Enter value] C - <i>Providing credit information services</i> [Enter value]
403A-C	Total revenue from your firm’s <i>credit-related regulated activities</i> (generated by activity of your <i>appointed representatives</i>)	A - <i>Credit broking</i> [Enter value] B - <i>Debt adjusting and debt counselling</i> [Enter value] C - <i>Providing credit information services</i> [Enter value]
Section 4.3: Relevant ancillary credit firm – miscellaneous		
Tell us about the following.		
Reference	Data element	Code (where applicable)
404A	Are you a member of a trade body or association that has a code of conduct that you are signed up to?	Yes/No

16 Annex 38DG **Notes for completion of data item relating to relevant ancillary credit firms**

Introduction

1. These notes relate to the CCR009 return in *SUP 16 Annex 38CR* (Data item relating to relevant ancillary credit firms).
2. They aim to assist *relevant ancillary credit firms* in completing and submitting the *data item* relevant to *credit broking, debt adjusting, debt counselling* and *providing credit information services*.
3. The purpose of the *data item* is to provide a framework for the collection of information by the *FCA* as a basis for its supervisory and other activities. It also has the purposes set out in *SUP 16.12.2G*.
4. The data should be accurate and not give a misleading impression of the *firm*. A *data item* is likely to give a misleading impression if a *firm* omits a material item, includes an immaterial item or presents items in a manner which is misleading.

Scope

5. Subject to *SUP 16.12.29BR*, *relevant ancillary credit firms* are required to complete the *data item* applicable to the activities they undertake as set out in *SUP 16.12.29CR*.

Defined terms

6. Where terms are italicised, they have the meaning shown in the *Glossary* of definitions in the *FCA Handbook*. Where we use an alternative word or phrase, we expect *firms* to apply an ordinary meaning to that word or phrase.

Currency

7. Unless otherwise stated, *firms* should report in sterling.
8. Where annual audited accounts are reported in a currency other than sterling, the values should be converted to sterling using an appropriate rate of exchange at the reporting date or, where appropriate, the rate of exchange fixed under the terms of any relevant currency hedging transaction.
9. Where you are reporting any monetary values, calculations or percentages, unless otherwise stated, figures should be reported to 2 decimal places.

10. Where you report any non-monetary values, unless otherwise stated, figures should be reported as a whole number.

General reporting guidelines

11. The *data elements* in SUP 16 Annex 38CR (Data item relating to relevant ancillary credit firms) should reflect the standard accounting practices followed in the preparation of a *firm's annual report and accounts*, unless otherwise stated.
12. Unless otherwise stated, your response should apply to the relevant reporting period as indicated in Note 12 under SUP 16.12.29CR.
13. All figures should be reported in single units.

CCR009 – Data item relating to relevant ancillary credit firms

14. This *data item* enables the *FCA* to better capture and understand how *firms* operate in the *consumer credit* markets.
15. Not all of the following questions will appear when a *firm* completes this return. Certain questions will only appear where applicable and based on a *firm's* responses.
16. Unless otherwise stated, the responses made by a principal firm must include a consolidated view of the activity carried on by the principal firm and their *appointed representatives*, including *introducer appointed representatives*. This applies to *data elements* which ask for qualitative information as well as figures.
17. In relation to an *appointed representative* with more than one *principal*, a *principal firm* must only report information about the *appointed representative's* activity for which the *principal firm* is responsible.

Guide for the completion of individual fields

Section 1: Reporting fields for a firm with permission to carry on the regulated activity of credit broking		
Section 1.1: Credit broking – permissions		
101A	Our systems show that you have the <i>credit broking permission</i> . Which of the following activities have been undertaken using that <i>permission</i> ?	<p>Select all that apply.</p> <p>See <i>PERG 2.7.7EG</i> for details of the activities that fall within <i>credit broking</i>.</p> <p>Examples of <i>credit broking</i> activities generally include, but are not limited to, the following (whether or not the <i>credit broking firm</i> earns a fee):</p> <p>A - A price comparison website that introduces <i>customers</i> to third-party <i>lenders</i> to take out a loan.</p> <p>A - A supplier of <i>goods</i> or services, such as a high street retailer or a dentist that introduces the <i>customer</i> to a third-party <i>lender</i> to pay for the <i>goods</i> or service.</p> <p>B - A motor dealer that introduces <i>customers</i> to a <i>finance</i> provider to facilitate the hire of a vehicle under a <i>consumer hire agreement</i>.</p> <p>B - A supplier of machinery that introduces the <i>customer</i> to a hire/lease company so they can hire/lease the equipment from that company under a <i>consumer hire agreement</i>.</p> <p>C - A motor dealer (or other type of supplier of goods or services) that introduces <i>customers</i> to a third-party company who then introduces that <i>customer</i> to a <i>lender</i> or a hire/leasing provider.</p> <p>C - An <i>insurance intermediary</i> who introduces a <i>customer</i> to an <i>insurer</i> who then introduces that <i>customer</i> to another third party company to pay their insurance premiums via a <i>credit agreement</i>.</p> <p>If the activities undertaken using the <i>credit broking permission</i> relate only to <i>credit agreements</i> secured by a <i>legal or equitable mortgage</i> on <i>land</i> and not any other <i>credit agreement</i> or <i>consumer hire agreement</i>, select 'X - None of the above'. You will then only need to complete 102A; and not the remainder of Section 1: Credit broking of this return.</p>

102A	Why do you hold your <i>credit broking permission</i> ?	Select one option only.
103A	If you have selected ‘W - Other reason’, please specify why you have not used your <i>credit broking permission</i>	N/A
104A	Do you engage in <i>credit broking</i> activity in respect of <i>individuals</i> who wish to enter into <i>credit agreements</i> or <i>consumer hire agreements</i> which are wholly or predominantly for the purposes of a business carried on, or intended to be carried on, by the <i>individual</i> ?	<p>Select one option only.</p> <p>Please answer in respect of <i>credit broking</i> activity undertaken in the past 12 <i>months</i> (if applicable). If not applicable, then please answer in respect of <i>credit broking</i> activity your firm intends to undertake within the next 12 <i>months</i>.</p>
105A	Do you engage in <i>credit broking</i> activity in respect of any of the following types of financial product?	<p>The selections made should relate to agreement types for which the reporting firm’s <i>credit broking</i> activities constitute <i>regulated activity</i>.</p> <p>Please answer in respect of <i>credit broking</i> activity undertaken in the past 12 months (if applicable). If not applicable, then please answer in respect of <i>credit broking</i> activity your firm intends to undertake within the next 12 months.</p> <p>Select all that apply.</p> <p>A - <i>Finance</i> for specific goods or services other than insurance premiums</p> <p>This includes <i>fixed-sum credit</i> and <i>running-account credit</i>, the use of which is restricted to the financing of <i>goods</i> or services other than insurance premiums. It also includes <i>consumer hire agreements</i>. It does not include <i>credit agreements</i> which are secured by a <i>legal or equitable mortgage</i> on <i>land</i>.</p>

		<p>B - <i>Finance</i> for insurance premiums This includes <i>fixed-sum credit</i> and <i>running-account credit</i>, the use of which is restricted to the financing of insurance premiums.</p> <p>C - <i>Credit agreements secured on land</i> This includes any <i>credit agreements</i> secured by a <i>legal or equitable mortgage on land</i>.</p> <p>D - Cash loans This includes any <i>fixed-sum credit</i> agreements which are not restricted to the financing of <i>goods</i> or <i>services</i>, and are not secured on <i>land</i>.</p> <p>E - Credit cards</p> <p>F - Overdrafts</p> <p>W - Any other <i>credit agreements</i> This includes <i>credit agreements</i> which are not one of any of the above agreement types.</p>
<p>For the remainder of Section 1: Credit broking, do not include any activities undertaken, or intended to be undertaken, using the <i>credit broking</i> permission which relate to <i>credit agreements</i> secured by a <i>legal or equitable mortgage on land</i>.</p>		
<p>Section 1.2: Credit broking – credit agreements (apart from finance for goods and services other than insurance premiums)</p>		
106B-W	Total number of introductions made by your firm (excluding activity of your <i>appointed representatives</i> , if you have any)	Total number of introductions of <i>individuals</i> made to prospective <i>lenders</i> , regardless of outcome. For firms that undertake <i>lead generator</i> activity, this includes the number of <i>customers</i> whose contact details were passed onto a <i>lender</i> or <i>credit broker</i> .
107B-W	Total number of introductions made by <i>appointed representatives</i> of your firm	

Section 1.3: Credit broking – goods and services		
108A	Which of the following <i>goods</i> and services relate to your firm's engagement in <i>credit broking</i> activity?	Select all that apply Please answer in respect of <i>credit broking</i> activity undertaken in the past 12 months (if applicable). If not applicable, then please answer in respect of <i>credit broking</i> activity your firm intends to undertake within the next 12 months.
109A	Does your firm supply any of the following <i>goods</i> to <i>individuals</i> , with a view to the purchase being made on <i>credit</i> ?	Select all that apply. Select the <i>good(s)</i> that your firm provides, in respect of which you may broker <i>credit</i> for. If your firm does not supply <i>goods</i> , and acts purely as a broker in this regard, select 'X - Our firm does not supply <i>goods</i> to <i>individuals</i> '.
110A	Does your firm supply any of the following services to <i>individuals</i> , with a view to the purchase being made on <i>credit</i> ?	Select all that apply. Select the service(s) that your firm provides, in which you may broker <i>credit</i> for. If your firm does not supply services, and acts purely as a broker in this regard, select 'X - Our firm does not supply services to <i>individuals</i> '.
Section 1.3.1: Credit broking – motor vehicles		
111A	Which of the following types of vehicles do you arrange <i>finance</i> for?	Select all that apply.
112A	What is the condition of vehicles you arrange <i>finance</i> for?	Select all that apply.

113A	Which types of <i>finance</i> are available on the vehicles you arrange <i>finance</i> for?	<p>Select all that apply.</p> <p>A - Personal contract purchase (PCP)</p> <p>A <i>hire-purchase agreement</i> which includes a guaranteed minimum future value of the motor vehicle which is set out as an optional additional repayment at the end of the agreement, with the option for the <i>borrower(s)</i> to return the motor vehicle instead of making that repayment.</p> <p>B - Hire-purchase (HP)</p> <p>A <i>hire-purchase agreement</i> that is not a personal contract purchase.</p> <p>C - Conditional sale</p> <p>A <i>conditional sale agreement</i>.</p> <p>D - Any other <i>credit</i></p> <p>A <i>credit agreement</i> which is not one of any of the above <i>credit agreement</i> types.</p> <p>E - Consumer hire</p> <p>A <i>consumer hire agreement</i>.</p>
Section 1.3.2: Credit broking – motor vehicles on credit agreements		
114A-W	Total number of introductions made by your firm (excluding activity of your <i>appointed representatives</i> , if you have any)	<p>Total number of introductions of <i>individuals</i> made to prospective <i>lenders</i>, regardless of outcome.</p> <p>For firms that undertake <i>lead generator</i> activity, this includes the number of <i>customers</i> whose contact details were passed onto a <i>lender</i> or <i>credit broker</i>.</p>
115A-W	Total number of introductions made by <i>appointed representatives</i> of your firm	
Section 1.3.3: Credit broking – motor vehicles on consumer hire agreements		

116A-W	Total number of introductions made by your firm (excluding activity of your <i>appointed representatives</i> , if you have any)	Total number of introductions of <i>individuals</i> made to prospective <i>owners</i> , regardless of outcome. For firms that undertake <i>lead generator</i> activity, this includes the number of <i>customers</i> whose contact details were passed onto an <i>owner</i> or <i>credit broker</i> .
117A-W	Total number of introductions made by <i>appointed representatives</i> of your firm	
Section 1.4: Credit broking – general goods and services		
118A	What types of <i>finance</i> are available on the <i>goods</i> and services you sell?	<p>Select all that apply.</p> <p>A - Hire-purchase (HP) <i>A hire-purchase agreement.</i></p> <p>B - Conditional sale <i>A conditional sale agreement.</i></p> <p>C - Any other <i>fixed-sum credit</i> <i>A fixed-sum credit agreement which is not one of any of the above agreement types.</i></p> <p>D - <i>Running-account credit</i> <i>A Running-account credit agreement</i></p> <p>E - Consumer hire <i>A consumer hire agreement.</i></p>
Section 1.4.1: Credit broking – general goods and services on credit agreements		
119B-S	Total number of introductions made by your <i>firm</i> (excluding	Total number of introductions of <i>individuals</i> made to prospective <i>lenders</i> , regardless of outcome.

	activity of your <i>appointed representatives</i> , if you have any)	For firms that undertake <i>lead generator</i> activity, this includes the number of <i>customers</i> whose contact details were passed onto a <i>lender</i> or <i>credit broker</i> .
120B-S	Total number of introductions made by <i>appointed representatives</i> of your <i>firm</i>	
Section 1.4.2: Credit broking – general goods and services on consumer hire agreements		
121B-S	Total number of introductions made by your firm (excluding activity of your <i>appointed representatives</i> , if you have any)	Total number of introductions of <i>individuals</i> made to prospective <i>owners</i> , regardless of outcome. For firms that undertake <i>lead generator</i> activity, this includes the number of <i>customers</i> whose contact details were passed onto an <i>owner</i> or <i>credit broker</i> .
122B-S	Total number of introductions made by <i>appointed representatives</i> of your firm	
Section 1.5: Credit broking – supplementary		
123A	What extras or add-ons does your firm sell in support of the main <i>goods</i> or service, not included as part of the <i>credit agreement</i> or <i>consumer hire agreement</i> ?	Select all that apply.
124A	What extras or add-ons does your firm sell in support of the main <i>goods</i> or service, included as part of the <i>credit</i>	Select all that apply.

	<i>agreement and consumer hire agreements?</i>	
Section 1.6: Credit broking – relationships with lenders, brokers and owners		
125A	Who does your firm engage with in relation to your <i>credit broking</i> activities to <i>individuals</i> for the purposes of obtaining <i>credit</i> ?	Select all that apply. ‘Within the same group’ refers to a company within the same group structure or another branch. ‘Unrelated’ means not part of the same corporate group structure. ‘Brokers’ in this instance means those <i>firms</i> that your firm introduces to.
Section 1.6.1: Credit broking – total introductions		
126AA-FA	Total <i>credit broking</i> revenue	Total income received from <i>individuals, credit brokers, lenders, owners</i> or vendors for your <i>credit broking</i> activities. This includes commissions, fees from <i>individuals</i> and any other income received.
126AB-FB	Total commission earned	This is a subtotal of total <i>credit broking</i> revenue.
126AC-FC	Total fees from <i>individuals</i>	This is a subtotal of total <i>credit broking</i> revenue.
126AD-FD	Other revenue received	This is a subtotal of total <i>credit broking</i> revenue.
126AE-FE	Total commission / merchant fees paid	Total amount paid to <i>credit brokers, lenders, owners</i> or vendors for your <i>credit broking</i> activities.
126AF-FF	Total introductions	Total number of <i>individuals</i> introduced regardless of outcome. For firms that undertake <i>lead generator</i> activity, this includes the number of <i>customers</i> whose contact details were passed onto a <i>lender</i> or <i>credit broker</i> .
Section 1.6.2: Credit broking – total introductions via appointed representatives		

127AA-AF	Total <i>credit broking</i> revenue (generated by activity of your <i>appointed representatives</i>)	Total income received from <i>individuals, credit brokers, lenders, owners</i> or vendors for your <i>credit broking</i> activities. This includes commissions, fees from <i>individuals</i> and any other income received.
127AB-FB	Total commission earned (generated by activity of your <i>appointed representatives</i>)	This is a subtotal of total <i>credit broking</i> revenue.
127AC-FC	Total fees from <i>individuals</i> (generated by activity of your <i>appointed representatives</i>)	This is a subtotal of total <i>credit broking</i> revenue.
127AD-FD	Other revenue received (generated by activity of your <i>appointed representatives</i>)	This is a subtotal of total <i>credit broking</i> revenue.
127AE-FE	Total commission / merchant fees paid (generated by activity of your <i>appointed representatives</i>)	Total amount paid to <i>credit brokers, lenders, owners</i> or vendors for your <i>credit broking</i> activities.
127AF-FF	Total introductions (generated by activity of your <i>appointed representatives</i>)	Total number of <i>individuals</i> introduced regardless of outcome. For firms that undertake <i>lead generator</i> activity, this includes the number of <i>customers</i> whose contact details were passed onto a <i>lender</i> or <i>credit broker</i> .
Section 1.6.3: Credit broking – top 5 lenders		
128A-132A	Name of <i>lender</i>	This can include <i>lenders</i> who are unrelated to your <i>firm</i> or within the same group.
128B-132B	Firm reference number (if applicable)	N/A

128C-132C	Total introductions	Total number of <i>individuals</i> in respect of whom your <i>firm</i> engaged in a <i>credit broking</i> activity.
128D-132D	Revenue (£)	Amount of commission earned by the <i>firm</i> from the <i>lender</i> in respect of the <i>firm's</i> engagement in <i>credit broking</i> activities.
128E-132E	Commission / merchant fees paid (£)	N/A
Section 1.6.4: Credit broking – top 5 lenders via appointed representatives		
133A-137A	Name of <i>lender</i>	This can include <i>lenders</i> who are unrelated to your <i>firm</i> or within the same group.
133B-137B	Firm reference number (if applicable)	N/A
133C-137C	Total introductions	Total number of <i>individuals</i> in respect of whom your <i>firm</i> engaged in a <i>credit broking</i> activity.
133D-137D	Revenue (£)	Amount of commission earned by the <i>firm</i> from the <i>lender</i> in respect of the <i>firm's</i> engagement in <i>credit broking</i> activities.
133E-137E	Commission / merchant fees paid (£)	N/A
Section 1.6.5: Credit broking – top 5 brokers		
138A-142A	Name of broker	This can include <i>credit brokers</i> who are unrelated to your <i>firm</i> or within the same group. 'Brokers' in this instance are defined as those firms that your firm introduces to.
138B-142B	Firm reference number (if applicable)	N/A

138C-142C	Total introductions	Total number of <i>individuals</i> in respect of whom your <i>firm</i> engaged in a <i>credit broking</i> activity, regardless of outcome. For firms that undertake <i>lead generator</i> activity, this includes the number of <i>customers</i> whose contact details were passed onto a <i>lender</i> or <i>credit broker</i> .
138D-142D	Revenue (£)	Amount of commission earned by the <i>firm</i> from the <i>credit broker</i> in respect of the <i>firm's</i> engagement in <i>credit broking</i> activities.
138E-142E	Commission / merchant fees paid	N/A
Section 1.6.6: Credit broking – top 5 brokers via appointed representatives		
143A-147A	Name of broker	This can include <i>credit brokers</i> who are unrelated to your <i>firm</i> or within the same group. 'Brokers' in this instance are defined as those firms that your firm introduces to.
143B-147B	Firm reference number (if applicable)	N/A
143C-147C	Total introductions	Total number of <i>individuals</i> in respect of whom your <i>firm</i> engaged in a <i>credit broking</i> activity, regardless of outcome. For firms that undertake <i>lead generator</i> activity, this includes the number of <i>customers</i> whose contact details were passed onto a <i>lender</i> or <i>credit broker</i> .
143D-147D	Revenue	Amount of commission earned by the <i>firm</i> from the <i>credit broker</i> in respect of the <i>firm's</i> engagement in <i>credit broking</i> activities.
143E-147E	Commission / merchant fees paid	N/A
Section 1.6.7: Credit broking – top 5 owners		

148A-152A	Name of <i>owner</i>	This can include <i>owners</i> who are unrelated to your <i>firm</i> or within the same group.
148B-152B	Firm reference number (if applicable)	N/A
148C-152C	Total introductions	Total number of <i>individuals</i> in respect of whom your <i>firm</i> engaged in a <i>credit broking</i> activity, regardless of outcome. For firms that undertake <i>lead generator</i> activity this includes the number of <i>customers</i> whose contact details were passed onto a <i>lender</i> or <i>credit broker</i> .
148D-152D	Revenue	Amount of commission earned by the <i>firm</i> from the <i>owner</i> in respect of the <i>firm's</i> engagement in <i>credit broking</i> activities.
148E-152E	Commission / merchant fees paid	N/A
Section 1.6.8: Credit broking – top 5 owners via appointed representatives		
153A-157A	Name of <i>owner</i>	This can include <i>owners</i> who are unrelated to your <i>firm</i> or within the same group.
153B-157B	Firm reference number (if applicable)	N/A
153C-157C	Total introductions	Total number of <i>individuals</i> in respect of whom your <i>firm</i> engaged in a <i>credit broking</i> activity, regardless of outcome. For firms that undertake <i>lead generator</i> activity this includes the number of <i>customers</i> whose contact details were passed onto a <i>lender</i> or <i>credit broker</i> .
153D-157D	Revenue	Amount of commission earned by the <i>firm</i> from the <i>owner</i> in respect of the <i>firm's</i> engagement in <i>credit broking</i> activities.

153E-157E	Commission / merchant fees paid	N/A
Section 1.7: Credit broking – declines		
158A	Does your firm introduce <i>individuals</i> that a <i>lender</i> or <i>owner</i> has declined for <i>credit</i> to another <i>credit broker</i> , <i>lender</i> or <i>hirer</i> outside of your standard panel?	For example, to a specialist <i>credit broker</i> who deals with low credit score <i>individuals</i> .
Section 1.8: Credit broking – firm remuneration		
159A	How is your firm remunerated for its <i>credit broking</i> activities?	Select all that apply.
Section 1.8.1: Credit broking – revenue per channel		
160A-W	Please provide your firm's revenue (excluding activity of your <i>appointed representatives</i> , if you have any) for each channel.	Set out the amount of revenue earned by the <i>firm</i> under each channel in respect of the <i>firm's</i> engagement in <i>credit broking</i> activities.
161A-W	Please provide your firm's revenue (generated through activity of your <i>appointed representatives</i>) for each channel.	Set out the amount of revenue earned by the firm under each channel in respect of the <i>firm's</i> engagement in <i>credit broking</i> activities.

162A	Does your firm proactively notify <i>individuals</i> that you receive commission from the <i>lender</i> or <i>owner</i> ?	Select one option only.
163A	Does your firm proactively tell <i>individuals</i> the value (or percentage) of the commission you receive?	Select one option only.
164A	When does your firm charge the <i>individual</i> fees for <i>credit brokering finance</i> ?	Select all that apply.
Section 1.9: Credit broking – sales channels		
165A	Which of the following channels have <i>individuals</i> used to purchase your products or services on <i>credit</i> ?	Select all that apply. Where an <i>individual</i> has agreed and accepted the terms and conditions and has made a payment to your <i>firm</i> such as an initial <i>deposit</i> or direct debit set up. For cross-channel sales journeys, this is where the bulk of the transaction takes place. Where a sale has been made through more than 1 method – eg, telephone and then post – report the channel where the product choice was made.
Section 1.9.1: Credit broking – comparison tool		
166A	Does your firm offer personalised digital credit comparison tools to <i>individuals</i> ?	For example, showing an <i>individual</i> a list of broking options between different <i>lenders</i> , or different types of <i>credit</i> products such as regulated <i>hire-purchase agreements</i> and personal loans.
Section 1.9.2: Credit broking – inside the individual’s home		

167A	Do you demonstrate the <i>goods</i> or service inside the <i>individual's</i> home?	N/A
168A	Do you provide a quote for <i>goods/services</i> while inside the <i>individual's</i> home?	N/A
169A	Do sales take place inside the <i>individual's</i> home?	A sale has taken place where an <i>individual</i> has agreed and accepted terms and conditions and there has been a payment made to your <i>firm</i> such as an initial <i>deposit</i> or direct debit set up.
Section 1.10: Credit broking – staff remuneration		
170A	Are any of your staff involved with the selling of regulated financial products?	N/A
171A	How are your sales staff remunerated in relation to your <i>regulated activities</i> ?	‘Sales staff’ in this instance is any staff member of the firm that interacts with <i>individuals</i> and sells <i>credit agreements</i> . The staff member may not be directly employed to do so, but this forms part of their role. Select one option only.
172A-B	What is the average percentage split between your sales staff salaries versus commission?	Provide percentage figures for both staff salary and commission.
173A	How many FTE sales staff do you employ that can receive commission / direct remuneration in relation to your <i>regulated activities</i> ?	‘Sales staff’ in this instance is any staff member of the firm that interacts with <i>individuals</i> and sells <i>credit agreements</i> . The staff member may not be directly employed to do so, but this forms part of their role. ‘Full-time equivalent (FTE)’ is a unit of measurement used to compare the number of hours worked by staff in a business. FTE is calculated by comparing a member of staff’s average hours

		worked to the average hours of a full-time member of staff. For example, if a full-time member of staff works 40 hours per week, and a part-time staff member works 20 hours per week, the part-time staff is counted as 0.5 FTE. If you are a sole proprietor with no additional staff, enter '0.00'.
174A	What is your firm's sales staff commission model?	Select all that apply. 'Fixed commission' is commission based per unit or for meeting sales targets. 'Variable commission' is commission based on a percentage of a product value.
175A	Do your sales staff earn commission on the sale of <i>goods</i> or services?	N/A
176A	Do your sales staff earn commission on <i>finance</i> agreements?	N/A
Section 2: Reporting fields for a firm with <i>permission</i> to carry on the regulated activities of debt adjusting or debt counselling		
Section 2.1: Debt adjusting and/or debt counselling – permissions		
201A	Our systems show that you have the <i>debt adjusting</i> and/or <i>debt counselling permission(s)</i> . Which of the following activities have you undertaken in relation to debts due under a <i>credit agreement</i> or a <i>consumer hire agreement</i> ?	See <i>PERG 2.7.8BG</i> and <i>PERG 2.7.8CG</i> for details of the activities that fall within <i>debt adjusting</i> and <i>debt counselling</i> , respectively. Select all that apply.
202A	Why do you hold <i>debt adjusting</i> and/or <i>debt counselling permission</i> ?	Select one option only.

203A	If you have selected “W - Other reason”, then please specify why have you not used your <i>permission</i> ?	N/A
For the remainder of Section 2: Debt adjusting and/or debt counselling, do not include any activities undertaken, or intended to be undertaken, using the <i>debt adjusting</i> and/or <i>debt counselling</i> permission which are in connection with <i>investment advice</i> , mortgage advice, or the whole or partial settlement of <i>credit agreements</i> to <i>finance</i> insurance premiums.		
Section 2.2: Debt adjusting and/or debt counselling – business model		
204A	Are you a firm that offers money/debt advice and/or provides <i>debt solutions</i> ?	<p>Select one option only.</p> <p>Please answer in respect of relevant activity undertaken in the past 12 months (if applicable). If not applicable, then please answer in respect of activity your firm intends to undertake within the next 12 months.</p> <p>‘Money advice’ means general advice on money-related issues such as budgeting, utility bills or council tax.</p> <p>‘Debt advice’ means giving an opinion as a guide to action to be taken, in this case the liquidation of debts. It either explicitly or implicitly steers the <i>individual</i> to a particular course of action as set out in <i>PERG</i> 17.5G.</p> <p>Should you refer <i>individuals</i> for a <i>debt solution</i> to another <i>firm</i> in the same umbrella group of companies as your own <i>firm</i>, select ‘C - Money/debt advice and <i>debt solutions</i>, in which the <i>debt solution</i> is provided by another <i>firm</i>’.</p>
Section 2.3: Debt adjusting and/or debt counselling – fees and revenues		
205A	What are the different types of money/debt advice that your firm offers?	Select all that apply.
206A	Are <i>individuals</i> charged a fee for money/debt advice that your firm offers?	This includes any administration fee for using your <i>firm</i> ’s service for debt advice.

207A	Do you charge a standalone fee for money/debt advice?	A one-off fee that your firm charges for providing debt advice.
208A	Do you charge a subscription fee for money/debt advice?	A regular payment made to receive a money/debt advice product or service from your <i>firm</i> .
209A-W	Total revenue of fees and commission per money/debt advice type for your firm (excluding activity of your <i>appointed representatives</i> , if you have any)	Provide values in respect of fees or commission received.
210A-W	Total revenue of fees and commission per money/debt advice type generated by <i>appointed representatives</i> of your firm	
Section 2.4: Debt adjusting and/or debt counselling – debt advice/solutions		
211A	Total number of your firm's <i>customers</i> (including new and existing) (excluding activity of your <i>appointed representatives</i> , if you have any)	<p>Include all <i>individuals</i> who approached your <i>firm</i> for money/debt advice and/or a <i>debt solution</i>.</p> <p>'Approach' means engagement with a <i>firm</i> through any one or more of the following channels:</p> <ul style="list-style-type: none"> • webform; • live/web chat; • chatbot; • email; • online/digital advice tool • instant messaging (eg, WhatsApp); • video conferencing or chat;

		<ul style="list-style-type: none"> • telephone; • SMS; • your own physical premises; • <i>individual's</i> home or dwelling; or • other non-trade premises.
<p>212A</p>	<p>Total number of <i>customers</i> (including new and existing) generated by activity of your <i>appointed representatives</i></p>	<p>Include all <i>individuals</i> who approached your <i>appointed representatives</i> for money/debt advice and/or a <i>debt solution</i>.</p> <p>‘Approach’ means engagement with a <i>firm</i> through any one or more of the following channels:</p> <ul style="list-style-type: none"> • webform; • live/web chat; • chatbot; • email; • online/digital advice tool • instant messaging (eg, WhatsApp); • video conferencing or chat; • telephone; • SMS; • your own physical premises; • <i>individuals's</i> home or dwelling; or • other non-trade premises.

213A	Total number of your firm's <i>customers</i> (excluding activity of your <i>appointed representatives</i> , if you have any) who received money/debt advice and did not take up a <i>debt solution</i>	When a <i>debt solution</i> (provided by your <i>firm</i>) was presented but the <i>individual</i> did not proceed with the arrangement, scheme or procedure. This should be a subset of the total number of <i>customers</i> .
214A	Total number of your firm's <i>customers</i> (generated by activity of your <i>appointed representatives</i>) who received money/debt advice and did not take up a <i>debt solution</i>	When a <i>debt solution</i> (provided by your <i>appointed representatives</i>) was presented but the <i>individual</i> did not proceed with the arrangement, scheme or procedure. This should be a subset of the total number of <i>customers</i> .
215A	Total number of your firm's <i>customers</i> (excluding activity of your <i>appointed representatives</i> , if you have any) who received money/debt advice and took up a <i>debt solution</i>	When a <i>debt solution</i> (provided by your <i>firm</i>) was presented and the <i>individual</i> proceeded with the arrangement, scheme or procedure. This should be a subset of the total number of <i>customers</i> .
216A	Total number of your firm's <i>customers</i> (generated by activity of your <i>appointed representatives</i>) who received money/debt advice and took up a <i>debt solution</i>	When a <i>debt solution</i> (provided by your <i>appointed representative</i>) was presented and the <i>individual</i> proceeded with the arrangement, scheme or procedure. This should be a subset of the total number of <i>customers</i> .
217A	Total number of your firm's <i>customers</i> (excluding activity of your <i>appointed representatives</i> , if you have any) who received money/debt advice and were not offered a <i>debt solution</i>	When, after engagement, no suitable <i>debt solution</i> was found or needed. This should be a subset of the total number of <i>customers</i> .
218A	Total number of your firm's <i>customers</i> (generated by activity of your <i>appointed</i>	

	<i>representatives</i>) who received money/debt advice and were not offered a <i>debt solution</i>	
219A	Total number of your firm’s <i>customers</i> (excluding activity of your <i>appointed representatives</i> , if you have any) who received money/debt advice and were referred to a <i>debt solution</i> that was offered by another <i>firm</i>	This could be referrals within the same group or to an unrelated <i>firm</i> . This should be a subset of the total number of <i>customers</i> .
220A	Total number of your firm’s <i>customers</i> (generated by activity of your <i>appointed representatives</i>) who received money/debt advice and were referred to a <i>debt solution</i> that was offered by another <i>firm</i>	
Section 2.4.1: Debt solutions offered and administered by your firm		
221A	What are the different types of <i>debt solutions</i> that your firm offers, in which the <i>debt solution</i> is administered by your firm?	Select all that apply.
222A-M	Total revenue for your firm (excluding activity of your <i>appointed representatives</i> , if you have any) of commission per <i>debt solution</i>	Provide values in respect of commission received, in which the <i>debt solution</i> is administered by you firm. Include any revenue received via Fair Share.
223A-M	Total up-front fees for your firm (excluding activity of your <i>appointed</i>	Provide values in respect of fees that are received up front – ie, received when the <i>debt solution</i> is entered into.

	<i>representatives, if you have any) per debt solution</i>	
224A-M	Total ongoing fees for your firm (excluding activity of your <i>appointed representatives, if you have any) per debt solution</i>	Provide values in respect of ongoing fees received in the reporting period – eg, a monthly fee received for a <i>debt solution</i> . Include all fees received in the reporting period, including those for <i>debt solutions</i> that have been entered into prior to said period.
225A-M	Total number of <i>debt solutions</i> (excluding activity of your <i>appointed representatives, if you have any) per solution type</i>	Provide values in respect of <i>debt solutions</i> that are administered by your firm.
Section 2.4.2: Debt solutions offered and administered by your firm via appointed representative		
226A-M	Total revenue for your firm (generated by activity of your <i>appointed representatives</i>) of commission per <i>debt solution</i>	Provide values in respect of commission received, in which the <i>debt solution</i> is administered by your <i>appointed representatives</i> . Include any revenue received via Fair Share.
227A-M	Total up-front fees for your firm (generated by activity of your <i>appointed representatives</i>) per <i>debt solution</i>	Provide values in respect of fees that are received up front – ie, received when the <i>debt solution</i> is entered into.
228A-M	Total ongoing fees for your firm (generated by activity of your <i>appointed representatives</i>) per <i>debt solution</i>	Provide values in respect of ongoing fees received in the reporting period – eg, a monthly fee received for a <i>debt solution</i> . Include all fees received in the reporting period, including those for <i>debt solutions</i> that have been entered into prior to said period.

229A-M	Total number of <i>debt solutions</i> (generated by activity of your <i>appointed representatives</i>) per <i>debt solution</i> type	Provide values in respect of <i>debt solutions</i> that are administered by your <i>appointed representatives</i> .
Section 2.4.3: Debt solutions offered by your firm but administered by another firm		
230A	What are the different types of <i>debt solutions</i> that your firm offers, in which the <i>debt solution</i> is administered by another <i>firm</i> ?	Select all that apply.
231A-M	Total revenue for your firm (excluding activity of your <i>appointed representatives</i> , if you have any) of fees or commission per <i>debt solution</i>	Provide values in respect of fees or commission received, in which the <i>debt solution</i> is administered by another <i>firm</i> .
232A-M	Total number of <i>debt solutions</i> (excluding activity of your <i>appointed representatives</i> , if you have any) per solution type	Provide values in respect of <i>debt solutions</i> that are administered by another <i>firm</i> .
Section 2.4.4: Debt solutions offered by your firm but administered by another firm via appointed representative		
233A-M	Total revenue (generated by activity of your <i>appointed representatives</i>) of fees or commission per <i>debt solution</i>	Provide values in respect of fees or commission received, in which the <i>debt solution</i> is administered by another <i>firm</i> .
234A-M	Total number of <i>debt solutions</i> (generated by activity of your <i>appointed representatives</i>) per solution type	Provide values in respect of <i>debt solutions</i> that are administered by another <i>firm</i> .

Section 2.4.5: Debt management plans		
235A	Total number of <i>debt management plans</i> (excluding plans entered into through activity of your firm's <i>appointed representatives</i> , if you have any) broken within 6 <i>months</i> of being entered into	A <i>debt management plan</i> is broken if 3 consecutive payments are missed, excluding partial payments.
236A	Total number of <i>debt management plans</i> (excluding plans entered into through activity of your firm's <i>appointed representatives</i> , if you have any) broken between 6 and 12 <i>months</i> of being entered into	
237A	Total number of <i>debt management plans</i> (excluding plans entered into through activity of your firm's <i>appointed representatives</i> , if you have any) being administered at the end of the reporting period	N/A
Section 2.4.6: Debt management plans via appointed representatives		
238A	Total number of <i>debt management plans</i> (generated by activity of your <i>appointed representatives</i>) broken within 6 <i>months</i> of entering into a solution	A <i>debt management plan</i> is broken if 3 consecutive payments are missed, excluding partial payments.
239A	Total number of <i>debt management plans</i> (generated by activity of your <i>appointed</i>	

	<i>representatives</i>) broken between 6 to 12 months after entering into a solution	
240A	Total number of <i>debt management plans</i> (generated by activity of your <i>appointed representatives</i>) being administered at the end of the reporting period	N/A
Section 2.5: Debt adjusting and/or debt counselling – charity and not-for-profit-body		
241A	Are you a <i>charity</i> or <i>not-for-profit body</i> ?	N/A
Section 2.6: Debt adjusting and/or debt counselling – funding source		
242A	Where do you receive funding from?	Select all that apply.
243A-W	What is the amount of funding received per source?	N/A
Section 2.7: Debt adjusting and/or debt counselling – network		
244A	Are you part of a network?	Select all that apply.
Section 2.8: Debt adjusting and/or debt counselling – engagement with individuals		
245A	How do you engage with <i>individuals</i> ?	Select all that apply. This relates to engagement before, during or after providing either debt advice or a <i>debt solution</i> .
Section 2.8.1: Debt adjusting and/or debt counselling – contact centre		
246A	Do you have a contact centre?	Select one option only.

		A ‘contact centre’ is a dedicated team/operation for answering phone calls/queries for debt or money advice over the phone.
247A	How many inbound calls are received?	‘Inbound’ means <i>individual to firm</i> .
248A	How many inbound calls are dropped?	‘Dropped’ means that the <i>individual</i> left the call queue before their call could be answered.
249A	How many inbound calls are answered?	‘Answered’ means that the call was taken by a member of staff.
250A	What is the total wait time for inbound calls (seconds)?	The ‘total wait time’ is the length of time that the <i>individual</i> waits to speak with a member of staff after that initial route. Set out the length of time in seconds by adding all of the wait times for all <i>individuals</i> .
251A	What is the average call waiting time (seconds)?	This is calculated by dividing the <i>individual’s</i> total wait time by the number of calls answered. Set out the length of time in seconds.
Section 2.8.2: Debt adjusting and/or debt counselling – web chat		
252A	Number of web chat enquiries	‘Enquiries’ mean that a user started an initial interaction through the communication tool.
253A	Number of web chat enquires that have been resolved	This relates to an interaction which the firm classed as resolved by the human agent.
254A	Number of webchat enquiries that have been abandoned	This relates to an interaction which was left unresolved, due to the disconnection of the chat.
Section 2.8.3: Debt adjusting and/or debt counselling – chatbot		
A real-time online communication tool that allows users to interact with a chatbot (a computer program that simulates and processes human conversation)		

255A	Number of chatbot enquiries that went on to involve a human agent	This relates to an interaction which needed further assistance provided by a member of staff.
256A	Number of chatbot enquiries that led to a resolution without speaking to a human agent	This relates to an interaction which the firm deemed to be successfully resolved by the chatbot.
257A	Number of chatbot enquiries that were abandoned	This relates to an interaction which was left unresolved, due to the disconnection of the chat.
Section 2.9: Debt adjusting and/or debt counselling – referrals		
258A	How are <i>individuals</i> referred to your firm	Referred as introduced to your firm by another <i>firm</i> for the purpose of obtaining money/debt advice and/or <i>debt solutions</i> . Select all that apply.
259A-Z	Total referrals per referral source type	Enter total referral numbers for each source type.
260A	How are <i>individuals</i> referred to <i>appointed representatives</i> of your firm?	Referred as introduced to your firm by another <i>firm</i> for the purpose of obtaining money/debt advice and/or <i>debt solutions</i> . Select all that apply.
261A-Z	Total referrals to <i>appointed representatives</i> of per referral source type	Enter total referral numbers for each source type.
Section 2.10: Debt adjusting and/or debt counselling – staff		
262A	Do you have <i>customer-facing</i> advisors?	A ' <i>customer-facing advisor</i> ' is anyone in the firm who interacts with <i>individuals</i> for the purpose of providing debt advice and/or <i>debt solution</i> services.

263A	What is the employment status of the <i>customer</i> -facing advisors in your firm?	Select all that apply. ‘Employed’ includes contractors or those directly employed by your firm.
264A	How many FTE <i>customer</i> -facing advisors do you employ?	Where you have part-time <i>customer</i> facing advisors, calculate this by adding the total hours worked by part-time and full-time <i>customer</i> facing advisors and dividing that total by the number of available full-time hours in year. For example, if the <i>firm</i> has 20 part-time <i>customer</i> facing advisors that work 50% of normal hours, the figure would be 10. Report to 2 decimal places where the result is not a whole number. For example, if the <i>firm</i> has 15 part time <i>customer</i> facing advisors that work 50% of normal hours, the figure would be 7.50.
265A	How are your <i>customer</i> -facing advisors remunerated?	Select all that apply.
266A-B	What is the average percentage split between your <i>customer</i> -facing advisors’ salaries and commission?	Provide percentage figures for both <i>customer</i> facing advisors’ salary and commission.
267A	Do your <i>consumer</i> -facing advisors earn commission when a <i>customer</i> enters a <i>debt solution</i> ?	Answer ‘Yes’ if advisors get a commission linked to <i>individuals</i> entering into a <i>debt solution</i> even where the commission is paid after a period of time, or other similar incentives where the commission is based on a number or percentage of <i>individuals</i> entering into a <i>debt solution</i> .
268A	How many <i>customer</i> -facing advisors volunteer with your firm?	N/A
Section 2.11: Debt adjusting and/or debt counselling – Settlements		
269A	Total number of settlements made by your firm (excluding activity of your <i>appointed representatives</i> , if you have	A settlement is each occasion where money is paid to cleared off the outstanding amount under the loan until it is repaid in full (including any applicable fees and interest).

	any) involving a part-exchange of a vehicle or <i>goods on finance</i>	
270A	Total value of all settlements made by your firm (excluding activity of your <i>appointed representatives</i> , if you have any) involving a part-exchange of a vehicle or <i>goods on finance</i>	
Section 2.11.1: Debt adjusting and/or debt counselling – settlements via appointed representatives		
271A	Total number of settlements made by <i>appointed representatives</i> of your firm involving a part-exchange of a vehicle or <i>goods on finance</i>	A settlement is each occasion where money is paid to cleared off the outstanding amount under the loan until it is repaid in full (including any applicable fees and interest).
272A	Total value of all settlements made by <i>appointed representatives</i> of your firm involving a part-exchange of a vehicle or <i>goods on finance</i>	
Section 2.12: Debt adjusting and/or debt counselling – prudential		
273A	Total value of <i>relevant debts under management</i> that are outstanding	Enter the total value of all the <i>relevant debts under management</i> that are used to calculate the <i>firm's</i> current prudential resources requirement. This should be the figure calculated at the latest <i>accounting reference date</i> , or, if there has been a change in the value of all the <i>relevant debts under management</i> of more than 15%, the recalculated figure. See <i>CONC 10.2.5R</i> to <i>CONC 10.2.10G</i> and <i>CONC 10.2.13R</i> to <i>CONC 10.2.14R</i> for further information.

274A	Total prudential resources requirement	<p>Enter whichever figure is higher out of:</p> <ul style="list-style-type: none"> • £5000; and • the variable prudential resources requirement calculated based on the value of <i>relevant debts under management</i> outstanding entered in element 270A (Total value of <i>relevant debts under management</i> that are outstanding). <p>See <i>CONC 10.2.5R</i>, <i>CONC 10.2.8R</i> and <i>CONC 10.2.11G</i> to <i>CONC 10.2.12G</i>.</p> <p>It is not permissible to answer ‘0’ for this question, even if ‘0’ was entered against 270A (Total value of <i>relevant debts under management</i> that are outstanding), as the minimum prudential resources requirement in <i>CONC 10</i> is £5,000.</p>
275A	Total prudential resources	Enter the <i>firm’s</i> total prudential resources, calculated in accordance with <i>CONC 10</i> .
Section 2.13: Debt adjusting and/or debt counselling – client money		
276A	Select the option which describes your <i>firm’s regulated activity</i> in relation to client money.	<p>Select 1 option only.</p> <p>Your <i>firm</i> is not subject to a <i>requirement</i> imposed under section 55L of the <i>Act</i> stating that it must not hold client money, or such a <i>requirement</i> to the same effect.</p> <p>This section of the <i>data item</i> relates to money which your <i>firm</i> receives or holds on behalf of a <i>client</i> in the course of or in connection with <i>debt management activity</i> only.</p>
277A	What was the balance of client money held as at the reporting period end?	N/A
278A	What was the highest total amount of client money held during the reporting period?	<p>Report the highest total amount of client money held during the preceding reporting period.</p> <p>Monetary values must be a sterling equivalent GBP (£) reported to 2 decimal places.</p> <p>Record zero amounts as 0.00.</p>

279A	If the firm did not hold client money during the reporting period, please project what the firm will hold for the next calendar year.	N/A
280A	What is your ' <i>CASS debt management firm type</i> ' classification?	Select 1 option only. As described in <i>CASS 11.2.3R</i> .
281A	What was the highest number of <i>clients</i> for whom client money was held at any one time during the reporting period?	A <i>CASS debt management firm</i> should enter the highest number of <i>clients</i> for whom client money was held in respect of <i>debt management activity</i> at a single point in time during the reporting period.
282A-D	What was the balance of unallocated client money held as at the reporting period end which has remained unallocated for a period of 6 <i>business days</i> or more?	When entering this data, <i>firms</i> should report the data according to 1 of 4 specified time bands according to the length of time for which the client money has remained unallocated: <ul style="list-style-type: none"> • 6-29 <i>days</i>; • 30-59 <i>days</i>; • 60-90 <i>days</i>; and • 90+ <i>days</i>. This would align with a similar question on unresolved client money items in the client money and asset return (CMAR) for <i>investment firms</i> (see Q24 in the CMAR) set out in <i>SUP 16 Annex 29R</i> (Client Money and Asset Return).

Section 3: Reporting fields for a firm with *permission* to carry on the regulated activity of providing credit information services

Section 3.1: Providing credit information services – permissions

301A	Our systems show that you have <i>permission</i> for providing credit information services. Which of the	Select all that apply.
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	following activities have you undertaken?	See <i>PERG 2.7.20KG</i> for details of the activities that fall within <i>providing credit information services</i> .
302A	Why do you hold <i>providing credit information services permission</i> ?	Select 1 option only.
303A	If you have selected ‘W - Other reason’, please specify why you have not used your <i>permission</i>	N/A
304A	In the past 12 <i>months</i> , where have you got <i>credit information</i> from?	Select all that apply.
Section 3.2: Providing credit information services – fee model		
305A	Do you charge a fee for getting <i>credit information</i> on behalf of an <i>individual</i> ?	A ‘standalone fee’ is a one-off fee. A ‘subscription fee’ is a regular payment made to receive a product or service. Select all that apply.
Section 3.2.1: Providing credit information services – standalone fees		
306A	Fee charged per <i>individual</i> (excluding activity of your <i>appointed representatives</i> , if you have any)	The standalone fee that is charged per <i>individual</i> for obtaining <i>credit information</i> on their behalf. Where the fee is not fixed, enter the average amount of all of the fees charged within the reporting period.
307A	Total number of <i>individuals</i> charged a fee (excluding activity of your <i>appointed representatives</i> , if you have any)	The total number of <i>individuals</i> charged a fee for obtaining <i>credit information</i> .

308A	Total revenue from fees (excluding activity of your <i>appointed representatives</i> , if you have any)	The total amount of income received for getting <i>credit information</i> on behalf of an <i>individual</i> .
309A	Fee charged per <i>individual</i> (generated by activity of your <i>appointed representatives</i>)	The standalone fee that is charged per <i>individual</i> for obtaining <i>credit information</i> on their behalf. Where the fee is not fixed, enter the average amount of all of the fees charged within the reporting period.
310A	Total number of <i>individuals</i> charged a fee (generated by activity of your <i>appointed representatives</i>)	The total number of <i>individuals</i> charged a fee for obtaining <i>credit information</i> .
311A	Total revenue from fees (generated by activity of your <i>appointed representatives</i>)	The total amount of income received for getting <i>credit information</i> on behalf of an <i>individual</i> .
Section 3.2.2: Providing credit information services – subscription fees		
312A	What subscription terms do you (excluding activity of your <i>appointed representatives</i> , if you have any) offer?	Select all that apply. A ‘subscription term’ is the inherent commitment length for subscriptions linked to the service you provide.
313A-W	What are the subscription fees for each of the subscription terms (excluding activity of your <i>appointed representatives</i> , if you have any)?	A ‘subscription fee’ is the fee that is charged per <i>individual</i> for obtaining <i>credit information</i> on their behalf. Where the fee is not fixed, enter the average amount of all of the fees charged within the reporting period.

314A	What subscription terms do you (generated by activity of your <i>appointed representatives</i>) offer?	Select all that apply. A ‘subscription term’ is the inherent commitment length for subscriptions linked to the service you provide.
315A-W	What are the subscription fees for each of the subscription terms (generated by activity of your <i>appointed representatives</i>)?	A ‘subscription fee’ is the fee that is charged per <i>individual</i> for obtaining <i>credit information</i> on their behalf. Where the fee is not fixed, enter the average amount of all of the fees charged within the reporting period.
Section 3.3: Providing credit information services – subscriptions		
316A	How many <i>individuals</i> signed up to a subscription (excluding activity of your <i>appointed representatives</i> , if you have any)?	N/A
317A	How many <i>individuals</i> have cancelled a subscription?	N/A
318A	What is the total revenue made from subscriptions?	The total amount of income received from <i>individual</i> subscriptions.
319A	What is the average duration of a subscription before it is cancelled (excluding activity of your <i>appointed representatives</i> , if you have any)?	The average length of time from when an <i>individual</i> signs up to the subscription service to when they cancel, in respect of agreements cancelled. Set out your response in <i>days</i> . Do not count those <i>individuals</i> that cancelled within a cooling-off period.
320A	How many <i>individuals</i> signed up to a subscription (generated by activity of your <i>appointed representatives</i>)?	N/A

321A	How many <i>individuals</i> have cancelled a subscription (generated by activity of your <i>appointed representatives</i>)?	N/A
322A	What is the total revenue made from subscriptions (generated by activity of your <i>appointed representatives</i>)?	The total amount of income received from <i>individual</i> subscriptions.
323A	What is the average duration of a subscription before it is cancelled (generated by activity of your <i>appointed representatives</i>)?	The average length of time from when an <i>individual</i> signs up to the subscription service to when they cancel, in respect of agreements cancelled. Set out your response in <i>days</i> . Do not count those <i>individuals</i> that cancelled within a cooling-off period.
Section 3.3.1: Providing credit information services – subscription cancellations		
324A	Are <i>individuals</i> able to cancel their subscription term early?	N/A
325A	Do you charge a cancellation fee?	N/A
326A	How much is the cancellation fee?	Where the fee is not fixed, enter the average amount of all of the fees charged within the reporting period.
Section 3.4: Providing credit information services – business model		
327A	Do you collect the information in order to give wider financial advice (eg, as part of your role as a mortgage or financial adviser)?	For the purposes of this <i>data element</i> , ‘advice’ is giving an opinion to the <i>individual</i> . It either explicitly or implicitly steers the <i>individual</i> to a particular course of action.
328A	Do you collect the information in order to undertake regulated debt	N/A

	advice (eg, as part of offering <i>debt counselling</i> and/or <i>debt adjusting services</i>)?	
Section 3.5: Providing credit information services – credit score		
329A	Do you collect the information to give general advice on how an <i>individual</i> should improve their credit score (eg, sign up to the electoral roll)?	For the purposes of this <i>data element</i> , ‘advice’ is giving an opinion to the <i>individual</i> – in this case, general advice on how an <i>individual</i> should improve their credit score. It either explicitly or implicitly steers the <i>individual</i> to a particular course of action.
330A	Do you collect the information to tailor the advice on how an <i>individual</i> should improve their credit score?	For the purposes of this <i>data element</i> , ‘advice’ is giving an opinion to the <i>individual</i> – in this case, general advice on how an <i>individual</i> should improve their credit score. It either explicitly or implicitly steers the <i>individual</i> to a particular course of action.
331A	In your marketing, do you advertise that you can improve an <i>individual’s</i> credit score?	N/A
332A	What is the total number of <i>individuals</i> you track credit scores for (excluding activity of your <i>appointed representatives</i> , if you have any)?	‘Tracking credit scores’ means monitoring an <i>individual’s credit score</i> to measure positive or negative change.
333A	What is the total number of <i>individuals</i> you track credit scores for (generated by activity of your <i>appointed representatives</i>)?	

334A	Of the <i>individuals</i> you track credit scores for, how many have had an improved score after using your services (excluding activity of your <i>appointed representatives</i> , if you have any)?	‘Improvement’ means a positive change in an <i>individual’s</i> credit score.
335A	Of the <i>individuals</i> you track credit scores for, how many have had an improved score after using your services (generated by activity of your <i>appointed representatives</i>)?	
Section 3.6: Providing credit information services – tailoring advice		
336A	Do you tailor the advice per <i>individual</i> ?	For the purposes of this <i>data element</i> , ‘advice’ is giving an opinion as a guide to action to be taken, in this case tailored advice (as in advice that is unique to that specific <i>individual</i>) on how an <i>individual</i> should improve their credit score. It either explicitly or implicitly steers the <i>individual</i> to a particular course of action.
337A	Do you tailor the advice based an <i>individual’s</i> credit score?	For the purposes of this <i>data element</i> , ‘advice’ is giving an opinion as a guide to action to be taken, in this case tailored advice (as in advice that is unique to that specific <i>individual</i>) on how an <i>individual</i> should improve their credit score. It either explicitly or implicitly steers the <i>individual</i> to a particular course of action.
338A	Do you utilise the <i>credit information</i> to provide tailored introductions to <i>lenders</i> (eg, to offer price comparison services or other <i>credit broking</i> activities)?	N/A

339A	Do you tailor the list of <i>lenders/credit brokers</i> based on credit score?	‘Tailoring a list of <i>lenders/credit brokers</i> ’ means presenting a set of <i>lenders/credit brokers</i> to <i>individuals</i> that are deemed to be appropriate to that <i>individual</i> based on their credit score.
340A	Do you rank <i>credit</i> facilities in order of <i>lenders</i> that provide the highest value commissions?	N/A
341A	What is the total number of <i>individuals</i> who have gone on to take out <i>credit</i> based on a referral via your firm (excluding activity of your <i>appointed representatives</i> , if you have any)?	N/A
342A	What is the total number of <i>individuals</i> who have gone on to take out <i>credit</i> based on a referral via your firm (generated by activity of your <i>appointed representatives</i>)?	

Section 4: Reporting fields for a relevant ancillary credit firm

Section 4.1: Relevant ancillary credit firm – marketing

401A	Which of the following channels does your firm use for marketing?	<p>Select all that apply.</p> <p>For <i>credit broking</i>, channels used for the marketing of financial services, <i>goods</i>, or services in which the use of <i>credit</i> is promoted.</p> <p>For <i>debt adjusting</i> and <i>debt counselling</i>, channels used for the marketing of debt and money advice and/or <i>debt solution</i> services.</p>
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		<p>For <i>providing credit information services</i>, channels used for the marketing of services in which <i>credit information</i> is provided.</p> <p>Select all that apply. If your firm does not specifically do any marketing in relation to the above <i>regulated activities</i>, select ‘X - None of the above’.</p>
Section 4.2: Relevant ancillary credit firm – revenues		
402A-C	Total revenue from your firm’s <i>credit-related regulated activities</i> (excluding activity of your <i>appointed representatives</i> , if you have any)	<p>Total amount of revenue received from the following <i>credit-related regulated activities</i>:</p> <ul style="list-style-type: none"> • <i>credit broking</i>; • <i>debt adjusting</i>; • <i>debt counselling</i>; and • <i>providing credit information services</i>.
403A-C	Total revenue from your firm’s <i>credit-related regulated activities</i> (generated by activity of your <i>appointed representatives</i>)	<p>For example, a <i>firm</i> sells a product for £1,000 after referring the <i>individual</i> for financing. The <i>firm</i> receives £50 commission for the <i>credit broking</i> referral, as well as the £1,000 for the product sale. The <i>firm</i> would report its <i>credit broking</i>-related revenue as £50.</p> <p>£0 can be reported if no income is derived from the <i>permissions</i> that the <i>firm</i> holds. For example, if a <i>not-for-profit body</i> provides debt and money advice services free of charge and receives no other revenue, it can report £0. Equally, if a retail <i>firm</i> holds the <i>permission</i> of ‘<i>credit broking</i>’ only and receives no commission or financial incentives from the <i>finance</i> companies it refers to, nor does it charge for the referral, it can report £0. In this scenario, the retail <i>firm</i> will get paid for the item in full, but for the specific activity of <i>credit broking</i>, no income was received. Selling of <i>goods</i> in itself is not a <i>regulated activity</i>.</p>
Section 4.3: Relevant ancillary credit firm – miscellaneous		
404A	Are you a member of a trade body or association that has a code of conduct that you are signed up to?	N/A

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