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Gavin Davies
Financial Conduct Authority
12 Endeavour Square
London
E20 1JN

7 December 2018

Dear Gavin,

Temporary permissions regime for inbound firms and funds CP18/29

The Financial Services Consumer Panel welcomes the opportunity to respond to this consultation.

We support the balanced approach the FCA is proposing. It will be important for those firms considering continuing to operate within the UK to understand the requirement to commit to certain UK standards, which may be higher than those required by their national authorities.

To ensure benefits to UK consumers, it will be important that they understand fully the level of service and protections passported firms are able to offer. The FCA must ensure firm communications are written in plain English, setting out whether they will receive continuity of service, and what level of protections will come with that service under the new regime. The FCA should not rely on its Financial Services Register alone to communicate these protections. The Money Advice Service (MAS), and the Single Financial Guidance Body (SFGB) when it comes into existence, both have a role to play.

Q1: Do you agree that our proposed rule changes give adequate effect to our general approach for TP firms? If not, why not?

Yes

Q2: Do you agree with our approach to applying the Principles? If not, why not?

Yes. Protections for consumers of TP firms must be in line with those afforded to the consumers of UK based firms.

Q3: Do you agree with our approach to applying the Prudential sourcebooks to TP firms?

Yes

Q5: Do you agree with our proposals on protecting client assets held by firms in the TPR? If not, why not?

Yes.

Q6: Do you agree that TP firms should be required to contribute to the SFGB costs on the same basis as UK firms from 30 March 2019 onwards? If not, why not?

Yes.

Q7: Do you agree with our proposals for the IML levy payable by TP firms? If not, why not?

Yes

Yours sincerely

Sue Lewis, Chair, Financial Services Consumer Panel