



# **Your relationship with the regulator**

Wednesday, 24 June 2026 | 10:00am – 11:15am

# Agenda

- 1 Authorisation and change in control applications
- 2 Senior Management Function appointments
- 3 Technical queries and interpretation of requirements
- 4 Regulatory enquiries and data requests
- 5 Q&A

# Industry experts speaking today



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Director

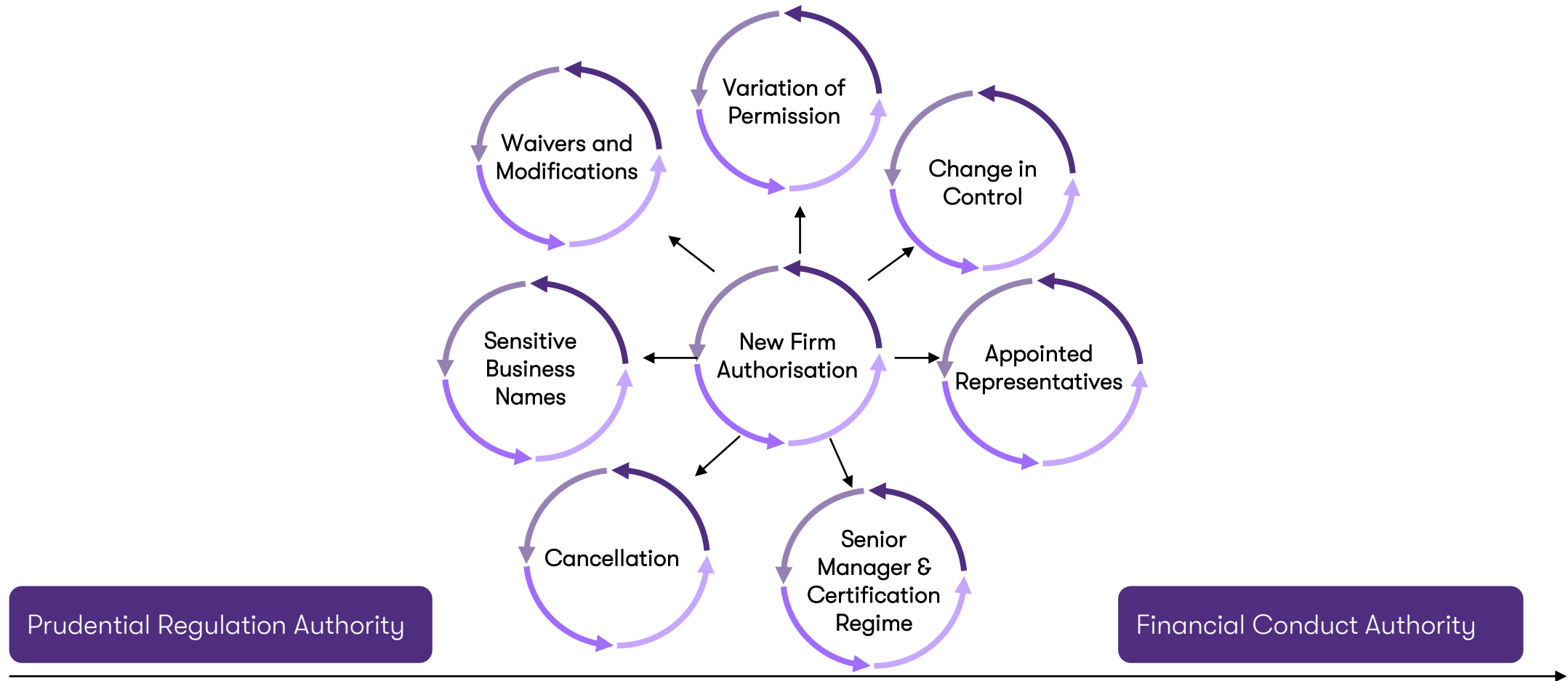


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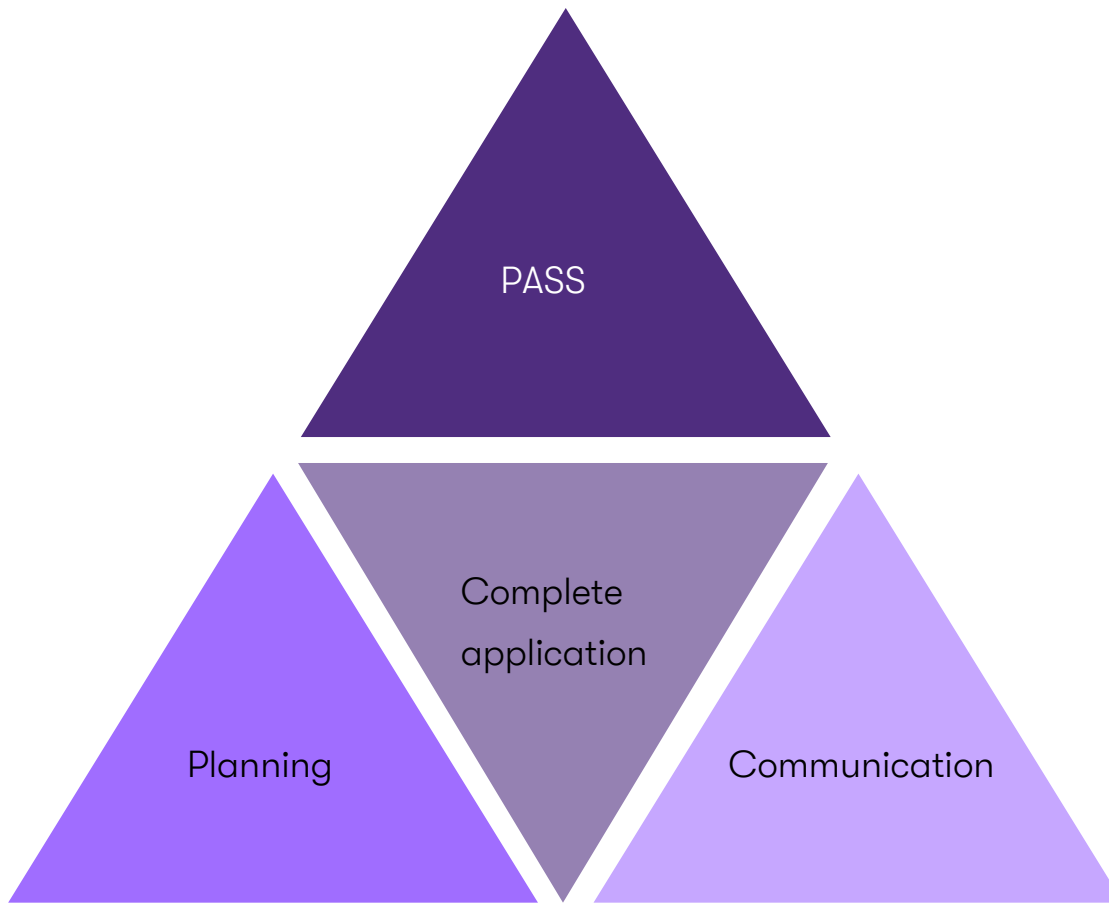
# **1 Authorisation and change in control applications**

# Firms approach “the Gateway” for various reasons



# Ready, willing and organised

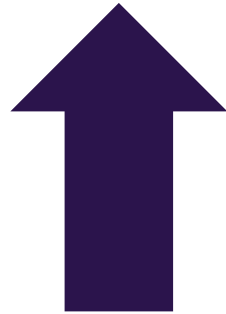
## Preparation is key



- The aim of the applicant is to arrive at the gateway with a complete application, ready to engage with the process and evidence how it will meet all the regulators requirements.
- Robust planning and preparation is necessary. This is underpinned by a clear understanding of your plans, strategy, and applicable regulations. Setting out clearly what you intend to do and the controls environment that you are setting up will allow the regulator to understand and engage with your application faster.
- The FCA has recently introduced a free Pre-application support service which allows most types of firm to have early engagement with the regulator about their application. Firms can request a meeting by submitting a query on Connect and setting out the questions they want to discuss.
- Open and clear communication throughout the process is crucial – whether it is to explain any incomplete elements of the application and how they will be finalised, or responding to the inevitable follow up queries.

# Shorter timelines to get approved

Quick approval



Prompt response  
expectations



# Change in control and M&A

Recent examples of the regulator using Change in control applications as a supervisory tool to:

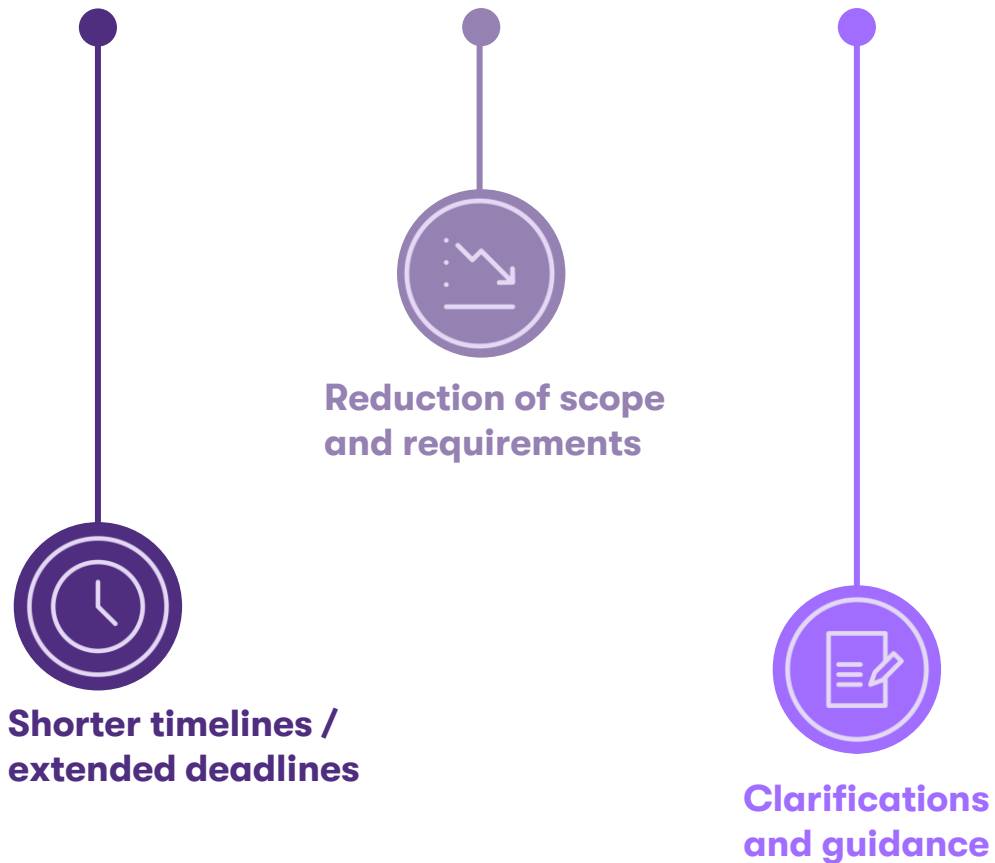
- Gain insight into firms/groups and their structure
- Pause transactions until regulatory concerns are addressed



## **2 Senior Management Function appointments**

# Senior Managers Regime changes

Phase 1 of reforms came into effect on 24 April 2026

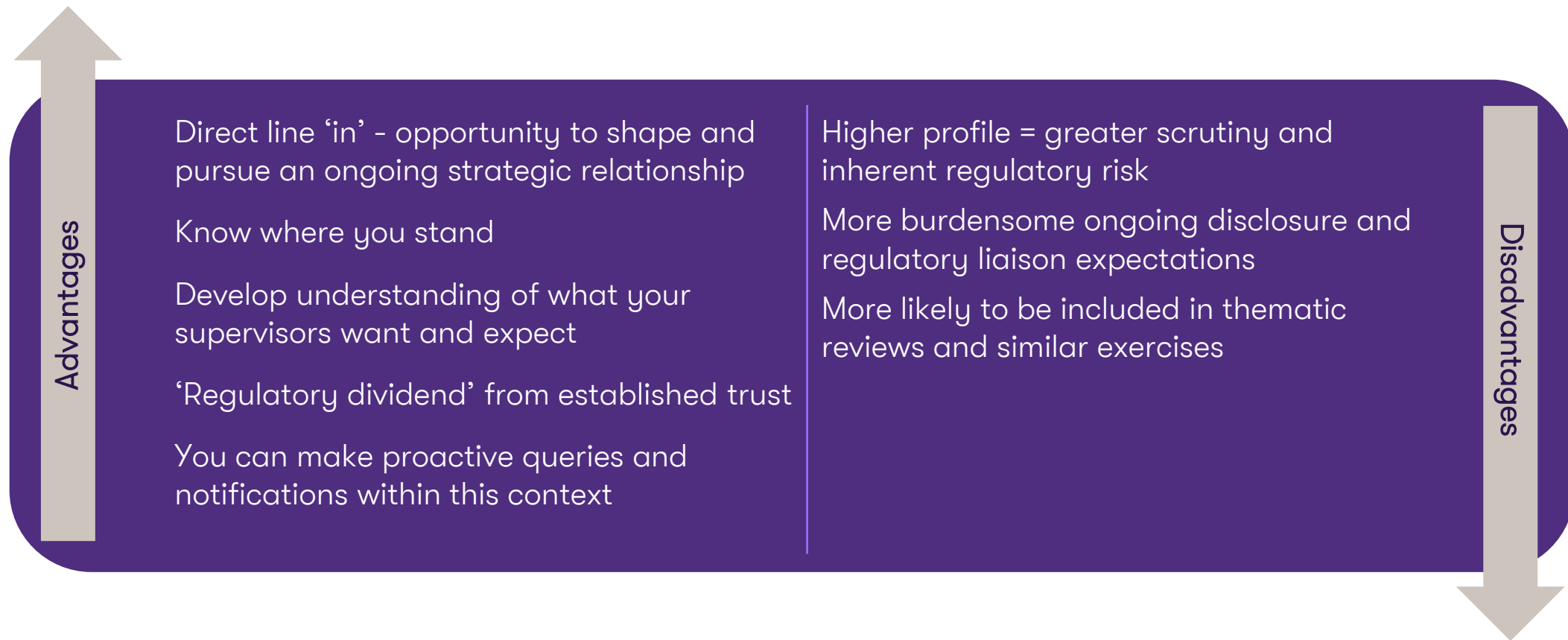


- The first phase of reforms of the Senior Managers and Certification Regime brought in a series of changes.
- The recent updates remain fairly administrative in nature, however the future update as part of Phase 2 is expected to be more structural.
- Firms should be aware of the new expectations and ready to comply with them.

# **3 Technical queries and interpretation of requirements**

# Fixed vs Flexible supervision – the double-edged sword

## Fixed Portfolio



# Fixed vs Flexible supervision – the double-edged sword

## Flexible Portfolio



### Advantages

Lower profile = lower scrutiny and inherent regulatory risk

Less burdensome ongoing disclosure and regulatory liaison expectations

Less likely to be included in thematic reviews and similar exercises



### Disadvantages

No direct line 'in' – no opportunity to shape and pursue an ongoing strategic relationship  
You don't know where you stand

No deep understanding of what your supervisors want and expect

No 'regulatory dividend' from established trust

You can't make proactive queries and notifications within this context

# Making proactive notifications or queries to FCA

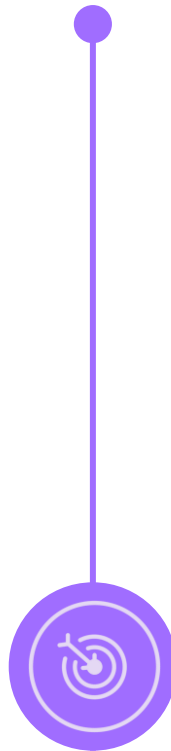
Maximising the value of the interaction whilst minimising risk



**Make clear and precise notifications or requests – don't ask for FCA's general views or endorsement**



**Position and context – be alive to the risk of read-across and inadvertent raising of 'red flags'**



**Have a clear goal and well-reasoned suggested approach outcome**

Approach may vary between:

- Routine 'transactions,' e.g., SMCR notifications and ad hoc, higher risk contacts, e.g., notifiable events
- Fixed and flexible portfolio firms
- Why the notification or query? What's in it for the firm and for the FCA?
- Get the timing right
- Consider how the proactive contact will be perceived - what might FCA read into the request?
- Apply internal governance disciplines to oversee the proactive contact (as necessary)

# **4 Regulatory enquiries and data requests**

# Responding to requests from FCA

Maximising the value of the interaction whilst minimising risk

Ongoing advice charges survey

Wholesale insurance broker culture survey

Non-financial misconduct questionnaire

Operational resilience and third-party risk surveys

Consumer Duty implementation monitoring surveys

Financial crime returns / AML effectiveness reviews

Appointed Representative oversight reviews

Cryptoassets financial promotions questionnaire

Consumer Finance market study

Pure Protection market study

Bereavement journeys questionnaire

Deceased clients process questionnaire

MPS providers conflicts of interest questionnaire

# How FCA considers firms' responses

## Meeting expectations and staying 'below the parapet'



Quality and timeliness of response and engagement

Does the firm's response meet the stated requirements?

Is the information accurate and credible?

How easy was it for the firm to prepare and approve its response?

Was appropriate board / senior management oversight provided?



Context and positioning

Is the firm's response straightforward to navigate and understand?

Is the firm's response consistent with our expectations and previous regulatory interactions?

Is the response well positioned, described and contextualised?



Outliers

Does it appear that the firm has not engaged appropriately with the request?

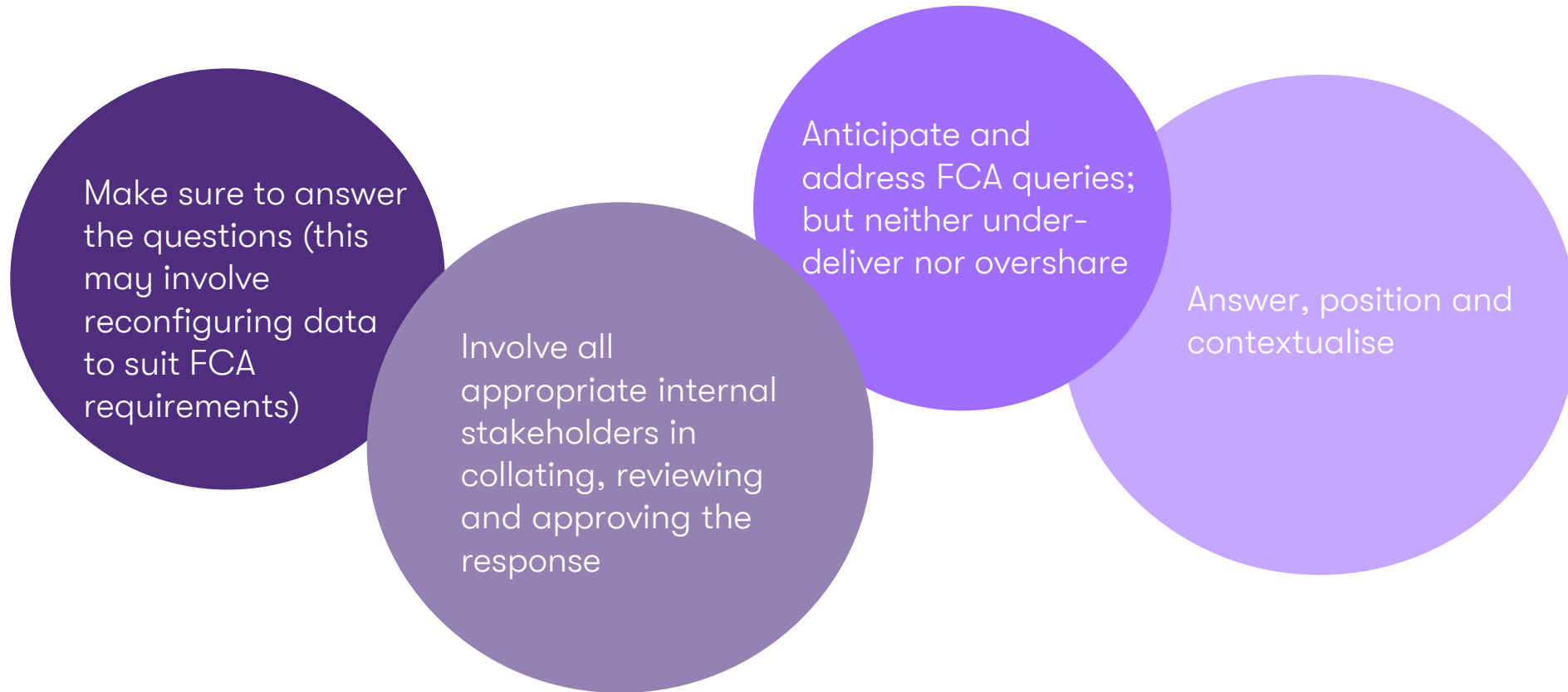
Does the response contain inaccuracies or inconsistencies (either within it or when considered alongside other regulatory submissions)?

Does the firm's response fall with the parameters of the FCA's expectations, either quantitative or qualitative?

Does either the content or the positioning and tone of the response mark the firm as an outlier, compared to others?

# Navigating the challenges

## How to avoid the pitfalls



# Get in touch



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