

Consultation Paper

CP24/19**

Consumer Credit Regulatory Returns:

Credit Broking, Debt Adjusting, Debt
Counselling and Providing Credit Information
Services

September 2024

How to respond

We are asking for comments on this Consultation Paper (CP) by **31 October 2024**.

You can send them to us using the form on our [website](#).

Or in writing to:

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Financial Conduct Authority
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London E20 1JN

Email:

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- a list of the names of respondents who made representations where those respondents consented to the publication of their names,
- an account of the representations we receive, and
- an account of how we have responded to the representations.

In your response, please indicate:

- if you consent to the publication of your name. If you are replying from an organisation, we will assume that the respondent is the organisation and will publish that name, unless you indicate that you are responding in an individual capacity (in which case, we will publish your name),
- if you wish your response to be treated as confidential. We will have regard to this indication, but may not be able to maintain confidentiality where we are subject to a legal duty to publish or disclose the information in question.

We may be required to publish or disclose information, including confidential information, such as your name and the contents of your response if required to do so by law, for example under the Freedom of Information Act 2000, or in the discharge of our functions. Please note that we will not regard a standard confidentiality statement in an email message as a request for non-disclosure.

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Chapter 1

Overview

Introduction

- 1.1** We are seeking views on our proposal to issue a new regulatory reporting return for consumer credit firms engaging in any one, or more, of the regulated activities of credit broking, providing credit information services, debt adjusting and debt counselling services. If introduced, this new return will replace the existing returns for these activities.
- 1.2** We want to improve the information we collect from firms so we can better understand their consumer credit activities and proactively supervise firms to identify and prevent risk of harm to consumers earlier. Collecting better quality information should enhance how we identify risk of harm and intervene quicker, in line with our overarching data-led strategy.
- 1.3** We currently collect data using regulatory returns that were introduced in 2014. However, firms, markets and the way we regulate have all changed significantly since then. This sector's firms now have a vast array of disparate and dynamic business models for credit broking, providing credit information services, debt adjusting, and debt counselling. As a result, the data we currently collect is too limited to sufficiently capture firms' changing business models and the nuances of their activities.
- 1.4** Our proposed return will be a series of questions about the way firms operate, engage with consumers and use the regulated activities for which they hold permission. Depending on a firm's responses, the return will present a range of questions which are relevant to their business model. We call this branching logic. It will allow us to better understand firms' activities, the products and services they are providing, and the extent of their regulated activities. This method also aims to tailor the set of questions so they are more readily aligned to firms business model and activities.
- 1.5** Regulatory returns provide a fundamental baseline for us to monitor and assess firms' ability to meet our threshold conditions on an ongoing basis. The current returns are only able to do this with significant levels of firm engagement, additional ad hoc data requests and vast amounts of manual intervention.
- 1.6** This information will better inform our supervision of firms in this sector. It will help us to:
- identify firms who exhibit high risk characteristics
 - prioritise our resources
 - take action quicker towards firms presenting the highest risk of harm to consumers and the market

- 1.7** Further information about our multi-year review of our existing consumer credit regulatory returns can be found in Chapter 2 of [CP23/21: Consumer Credit – Product Sales Data Reporting](#).

Summary of our proposals

- 1.8** We are proposing to issue a new regulatory return for consumer credit firms with permission to engage in any one, or more, of the following regulated activities:
- credit broking
 - debt adjusting
 - debt counselling services
 - providing credit information services
- 1.9** We refer to these in-scope firms as Relevant Ancillary Credit Firms and have introduced this defined term in the draft instrument at Appendix 1.
- 1.10** The new return will replace some of our existing returns for these activities. It will include 5 mandatory sections of questions for all firms in scope, in the following areas:
- permissions
 - business model
 - marketing
 - revenues
 - employees
- 1.11** After these questions, firms will be presented tailored questions specific to the relevant permissions they hold. These tailored questions should make it easier for firms to navigate our return forms while also enabling us to better understand the way these firms conduct business and use their permissions.

Who does this consultation affect?

- 1.12** You should read this CP if your firm is:
- engaged in credit broking
 - engaged in debt adjusting
 - engaged in debt counselling
 - engaged in providing credit information services
 - advises, represents or provides software to support compliance with regulatory reporting for any of the above firms

Context

- 1.13** In the consumer credit market, we are particularly interested in supply chains, consumer understanding of products and services, suitability of products and consumer support, and monitoring that firms are acting to deliver good retail customer outcomes in line with the Consumer Duty.
- 1.14** We have taken on board firms' feedback about our existing returns, including recent updates to the guidance and validation of CCR007. We have also analysed common questions we receive about the returns and the challenges some firms face in completing them. The new return's design seeks to resolve these issues by making our expectations of firms clearer and using common industry terminology to help understanding.
- 1.15** These proposals are designed to advance our operational objectives to:
- Secure an appropriate degree of protection for consumers (by helping us identify and assess risks to them and prevent harm).
 - Protect and enhance market integrity (by allowing us to make quicker and bolder decisions so the market keeps functioning well).
 - Promote effective competition in the interests of consumers (by enhancing our ability to monitor how competition is working in the market, including the choices customers make, and being able to intervene quicker when we see competition is not working as well as it could).
- 1.16** This CP is part of our multi-year plan to review and replace our regulatory returns for consumer credit regulated activities. It contributes to our aim to become a more data-led regulator as set out in our 2022-23 Business Plan. It follows the publication of [PS24/3](#), which introduced 3 new Product Sales Data (PSD) returns into Chapter 16 of the Supervision manual (SUP 16). We intend to replace further returns for firms undertaking other consumer credit activities. The stages of the multi-year plan will gradually replace all our existing consumer credit reporting (CCR) returns.

Measuring success

- 1.17** We expect to receive more detailed, accurate, and consistent data from firms through the proposed return. This should enable us to accurately identify how firms are using their permissions so that we can better understand which firms are engaging in activities with a higher risk of harm to consumers and how these risks are changing over time. It will allow us to supervise firms more efficiently, identify potential harms quicker and prioritise our engagement where harm is most likely to occur. As a result, we will be able to intervene and consequently reduce the level of risk quicker as well as more accurately identify where intervention is not required.
- 1.18** The data will also help us to identify earlier firms who aren't using their permissions and no longer require authorisation. By identifying these firms, we will be able to improve our processes which enable us to act faster to remove regulatory permissions that are no

longer being used. This will support our work to tackle issues raised by Dame Elizabeth Gloster's review into the regulation of London Capital & Finance (LC&F).

- 1.19** We aim to simplify the experience for firms and reduce difficulty when completing the return by providing questions that are more relevant and tailored to their business models. Firms will also be able to anticipate the data our returns will request of them. As a result, in the medium to long term, we expect to see a reduction in the number of queries we receive about how to complete our returns and expect to receive more returns submitted on time. We also expect to see a reduction in the number of ad hoc information requests we issue to firms.

Next steps

What do you need to do next?

- 1.20** Send us your feedback on our proposals by 31 October 2024, using the response form on our website.

What will we do?

- 1.21** We will consider your feedback, and aim to publish a final Policy Statement, including our response to feedback, in Spring 2025.

Chapter 2

Consumer Credit Regulatory Returns

Background

- 2.1** At present, we mainly collect aggregate data using regulatory returns introduced in 2014, when we took over responsibility for consumer credit regulation from the Office of Fair Trading (OFT). However, data requirements across consumer credit services have changed significantly.
- 2.2** Since 2014, the way these markets operate has changed. Developments include changes to the way these firms remunerate and incentivise their staff and reforms to credit brokers' fee structures. More recently, the Consumer Duty has set higher and clearer standards across markets for consumer protection and the need to put customers' needs first.
- 2.3** Firms' business models and products have also developed. Most of the firms in these markets were initially authorised in 2014 for regulated activities that allow for significant scope and adaptations that do not require variation of permission. So our current returns data are broad in nature. This makes it difficult to readily identify the complexities of a firm's business model (eg primary and secondary activity) and when a change in activity does not require a variation of permission. It can be particularly challenging to identify and supervise firms with Limited Permission for credit broking, where a firm's main business is the sale of goods or financial services and credit broking is their secondary activity to help finance the purchase of those goods and services.
- 2.4** The proposed return will ask firms whether they have been actively undertaking activities and using their permissions and, if not, asking the reason for this to determine whether firms intend to use their permissions. This will significantly improve our ability to proactively identify firms which have incorrect or outdated permissions on the Financial Services Register, ensuring the Register is accurate and up to date on firms' permissions.
- 2.5** To understand market and firm changes, we have been improving the way we collect and use data to spot and stop harm faster. Our Transformation Plan 'Transforming data collection from the UK financial sector: a plan for 2021 and beyond' sets out our vision to deliver improvements in data collection over the next decade. As a part of this, we launched our 'Single View Analytics Tool'. This gives key data and indicators at a firm and portfolio level from multiple sources, and we increased our use of advanced data analytics. However, to get the most benefit from these new tools, we need better quality data on the consumer credit sector.
- 2.6** As a result of these significant changes, we reviewed all of the data we collect for these consumer credit activities comprising existing returns and ad hoc data requests over the last few years, including feedback from firms. Through this review, we identified various issues, including:

- data that does not link to the key harms to consumers and markets
- data that is of poor quality with inconsistencies due some firms lack of understanding
- data that is no longer relevant
- a lack of context around how firms are using their permissions

2.7 We have set out the areas which are more closely aligned to the potential harms we see from these activities, provide context around the use of firms' permissions and are most relevant to our priorities.

	Credit broking	Providing credit information services	Debt adjusting & counselling	
Section /themes	Permissions			
	Business model			
	Marketing			
	Employees			
	Revenue			
	Sales channel	Fee model	Referrals	
	Goods & services	Stand-alone model	Debt advice	Debt solution
	Relationships	Subscription model	Non-profit funding source	Contact centre demand
	Firm remuneration		Network	Web chat demand
			Prudential	Client money

- Dependency (branch logic)
- Mandatory (core)

2.8 The proposed branching logic will also allow us to collect more detailed, quality data from firms where it is important and reduce the number of ad hoc information requests we issue to firms.

2.9 We have carefully considered the proportionality of our proposals and found the benefits of streamlined returns and more targeted supervision outweigh the costs set out in the CBA. The new return may present firms with more questions and data

elements depending on their business characteristics. But we consider the benefits of simplified returns that are easier for firms to complete which will reduce the number of ad hoc data requests that create additional regulatory burden. Moreover, our proposals enable more proportionate supervision by requesting data from firms whose business models pose the greatest risk of harm to consumers.

- 2.10** The proportionality of data requests, and the burden it places on firms, as well as the time given to compile requests are consistently raised by firms via our Practitioner Panel Survey.
- 2.11** We have developed our proposals following extensive engagement with industry and stakeholders to ensure our questions capture the nuances of these firms' products, services and business models. Moreover, we want to ensure firms can easily understand the information we want to collect and why. So the language in the returns, as well as the supporting guidance, is more closely aligned to industry terminology. We also engaged stakeholders to ensure that, where possible, firms already hold the data that we intend to collect. This will reduce any additional reporting burdens and ensures that we are assessing firms against the information that is most relevant to their activities. We also propose to extend the time given to firms to submit the data from the end of the reporting period.
- 2.12** Our engagement also included speaking with the Smaller Business Practitioner Panel about these proposals.

The key benefits of collating this data

Data led supervision

- 2.13** In line with our ambition to become a more data-led regulator as set out in our Transformation Plan and 2022-23 Business Plan, we aim to deliver a more data-led supervision approach for firms providing credit broking, debt adjusting, debt counselling and credit information services.
- 2.14** Our proposed regulatory return will give us information to allow us to better understand these markets and, how firms are using their regulated activities over time including complying with our Threshold Conditions and Handbook standards. With this data, we can make better risk-based decisions about where best to allocate our resource so that we can accurately and efficiently target our supervisory work.
- 2.15** This data will also help us better understand and monitor whether firms are acting to deliver good consumer outcomes in line with the Consumer Duty.

Reduction and prevention of consumer harm

- 2.16** Our proposed return will enable us to identify firms engaging in higher risk practices more easily and respond more quickly to emerging consumer harms.

2.17 We receive a considerable number of contacts about firms in this sector, including for example, 2,000 consumer queries (2023). Alongside this, in 2023, we pursued around 6,000 supervisory cases. Our proposal will capture more in-depth data about firms, their products, and business models so we can focus on problem firms, set our priorities, and be more proactive in identifying future harms to pre-empt adverse consumer outcomes before they happen. This means that lower risk firms will be subject to less supervisory engagement and we can focus on areas where we see more harm.

Improved firm experience

2.18 Our proposed return will customise the questions firms are required to answer relevant to their business models. This means we can proportionately collect levels of information appropriately aligned to the business model characteristics and activities. With these more tailored questions, firms should find it easier to complete the return and understand what information we are asking them to provide and why. With a clearer understanding of the information we require, firms should be able to anticipate the data we will request from them, organise their data collection systems and store relevant information accordingly.

2.19 This will result in an improved experience for firms submitting the new returns, better data quality and guidance, based on firm business models and other firm specific criteria.

2.20 We would also expect to issue fewer ad hoc data requests to firms as we will receive more detailed data from the new return. This should significantly reduce time and staff resource for both us, in managing the requests, and firms, in collating and providing the data.

Secondary international competitiveness and growth objective

2.21 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 on firms, we have tried to streamline them to support firms to meet our requirements more easily. By improving our ability to supervise firms effectively and proportionately, through access to good quality data firms can provide to identify earlier those firms presenting the highest risk of harm to consumers and the market, we hope to build trust and confidence in our markets which may lead to sustainable growth.

The Consumer Duty

2.22 Our proposal supports application of the Consumer Duty to deliver good customer outcomes for the markets in scope. By collecting more granular information about firms' business models and products, we can monitor and supervise whether firms are meeting the 4 expected outcomes for governance of products and services, price and value, consumer understanding, and consumer support. This information will allow us to proactively identify risk of harm to consumers and assess fair value for different

types of products and services by considering fees and remuneration models alongside customer outcomes, including via information gained from the new PSD return.

Environmental, social & governance considerations

- 2.23** We have considered the environmental, social and governance (ESG) implications of our proposals and our duty under ss. 1B(5) and 3B(1)(c) of FSMA to have regard to contributing towards the Secretary of State achieving compliance with the net-zero emissions target under section 1 of the Climate Change Act 2008.
- 2.24** We consider that the proposals are not relevant to contributing to those targets. We will keep this issue under review during the consultation and when considering whether to make the final rules. In the meantime, we welcome your input on this.

Equality and diversity considerations

- 2.25** We have considered the equality and diversity issues that may arise from our proposals.
- 2.26** Overall, we do not consider that the proposals 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). But we will continue to consider the equality and diversity implications of the proposals during the consultation and will revisit them when making the final rules.
- 2.27** In the meantime we welcome your input on this.

GDPR

- 2.28** We are also mindful of our obligations under the UK GDPR and Data Protection Act 2018. We have reviewed our proposed requirements on data collection, reporting and disclosure against the UK GDPR. We consider our proposals to be consistent with our obligations under the legislation and our proposals do not involve the processing of personal data.

Chapter 3

Summary of our proposed rules

- 3.1** This section outlines the new return we are proposing to issue and the data we are proposing to collect. The proposed Handbook amendments are set out in Appendix 1.

Proposed regulatory return

- 3.2** We propose to introduce a new return replacing the current returns to 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, and providing credit information services.
- 3.3** For principal firms the data return must include consolidated figures from all your appointed representatives unless specified otherwise.
- 3.4** The existing returns require 4 pieces of information for each of the relevant activities to understand the importance of these to the firm's business model, with some additional information on income / revenue across all products. While the proposed returns increase the number of questions an average firm would need to answer, many of the questions cover the same information but in a more insightful, and easier to interpret, way. The information currently collected does not provide enough information for us to effectively supervise over 30,000 firms and the millions of customers they serve and the non-specific way in which they are requested leads to poor data quality from firms interpreting the question in a variety of ways.
- 3.5** The return will include 5 mandatory sections of questions all firms in scope will be asked, including:
- Permissions – regarding the regulated activities firms have undertaken in the past 12 months.
 - Business model – regarding the financial products, goods, and/or services that firms are providing.
 - Marketing – regarding the channels firms are using to target consumers.
 - Revenue – total revenue from credit-related activities and non-credit related activities.
 - Employees – regarding the number of employees and incentive and remuneration arrangements.
- 3.6** Following these 5 sections, questions will be customised relevant to the permissions the firms hold (branching logic). For example, if a firm's responses to the mandatory questions identify them as a secondary broker with limited permission to introduce a consumer to finance a product or service, they will be presented with questions pertaining to the product and service they are broking.

3.7 The figure below shows the question structure of the new return with the mandatory questions for all firms in scope followed by the subsequent permission specific questions based on the branching logic.

Question structure for each part of the return

Return part	Section/themes	Description
All	Marketing	Marketing spend by channel eg Online, social media, TV etc
	Employees	Details of total number of employees by FTE Number of sales/advice staff and commission model Details of training and compliance
	Permission	Regulated activities undertaken in past 12 months
	Business model	Understand different types of businesses what financial product, goods and service they provide
	Revenue	Total revenue from credit related activities and non-credit related activities
Credit broking	Business model	What financial products are offered to consumers including finance for goods or services
	Goods & services	Type of finance being offered eg HP, PCP Maximum, minimum and average values of product Total number of agreements and total value of agreements Maximum, minimum and average APR
	Sales channel	Volume of transactions for each sales channel
	Relationships	Top 5, lender, broker and owner relationships named Number of referrals – successful and unsuccessful Commission earned
	Firm remuneration	How the firm is remunerated, eg flat fee – introduction or percentage of transaction value

Return part	Section/themes	Description
Debt adjusting & counselling	Business model	Type of service they offer whether it's just advice, provide debt solution or both
	Debt advice	List of the different types of debt advice offered Whether there are any charges for the advice given What are the fees and commission for debt advice Total number of consumers who enter debt advice
	Debt solution	List of types of debt solution offered with volumes of total numbers and revenue of fees and commission earned Total number of debt solution plans broken within 6 months and 12 months
	Network	Identify if firm is part of a network
	Call centre demand	Details of average calls received, dropped and waiting times
	Web chat demand	Details of number of web enquires and interaction with agent and whether it was successfully answered
	Referrals	Details of how consumers are referred to the firm
	Trade association	Identify whether they are part of a trade body or association
	Prudential	To reflect the underlying prudential requirements contained in CONC 10
	Client money	Details of how client money and assets are being held
PCIS	Fee model	Details how consumers are charged (if any) for getting credit information
	Stand-alone model	Details of charges, total revenues from fees and number of consumers
	Subscription model	Details of term of subscription, cancellation, fees, number of consumers and total revenue

Consultation questions

- 3.8** While we designed the new return following significant engagement with industry, we would like to understand if there are business models, business structures, or activities for which these proposals could be amended to improve firms' experience without diminishing the benefits we expect from the data.
- 3.9** We would welcome any feedback on our proposals in addition to the following questions. Where respondents do have feedback, please provide evidence so we can fully consider, and respond, to any points raised.

- 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?
- 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?
- Question 4:** Do you agree with the proposed timeline for implementing these returns?
- Question 5:** Do you agree with the proposed frequency of submissions, in line with a fixed calendar year?
- 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.

3.10 The full list of the permission specific questions is in Appendix 1.

Replacing current regulatory returns

- 3.11** Since the new return will ask more detailed questions specific to firms' business models to help us supervise the firms in scope, some of our current consumer credit returns will be completely or partially replaced by the new return.
- 3.12** We propose to replace our current regulatory return CCR004 – Consumer credit data: Debt management firms. As part of this replacement, the new return will include the following questions from the existing CCR004:
- CCR004 1A – Total value of relevant debts under management outstanding
 - CCR004 2A – Total prudential resources requirement
 - CCR004 3A – Total prudential resources
- 3.13** We also propose to replace our current regulatory return CCR005 – Consumer credit data: Client Money & Assets and incorporate questions from the existing CASS survey which some firms complete (subject to the changes set out below).

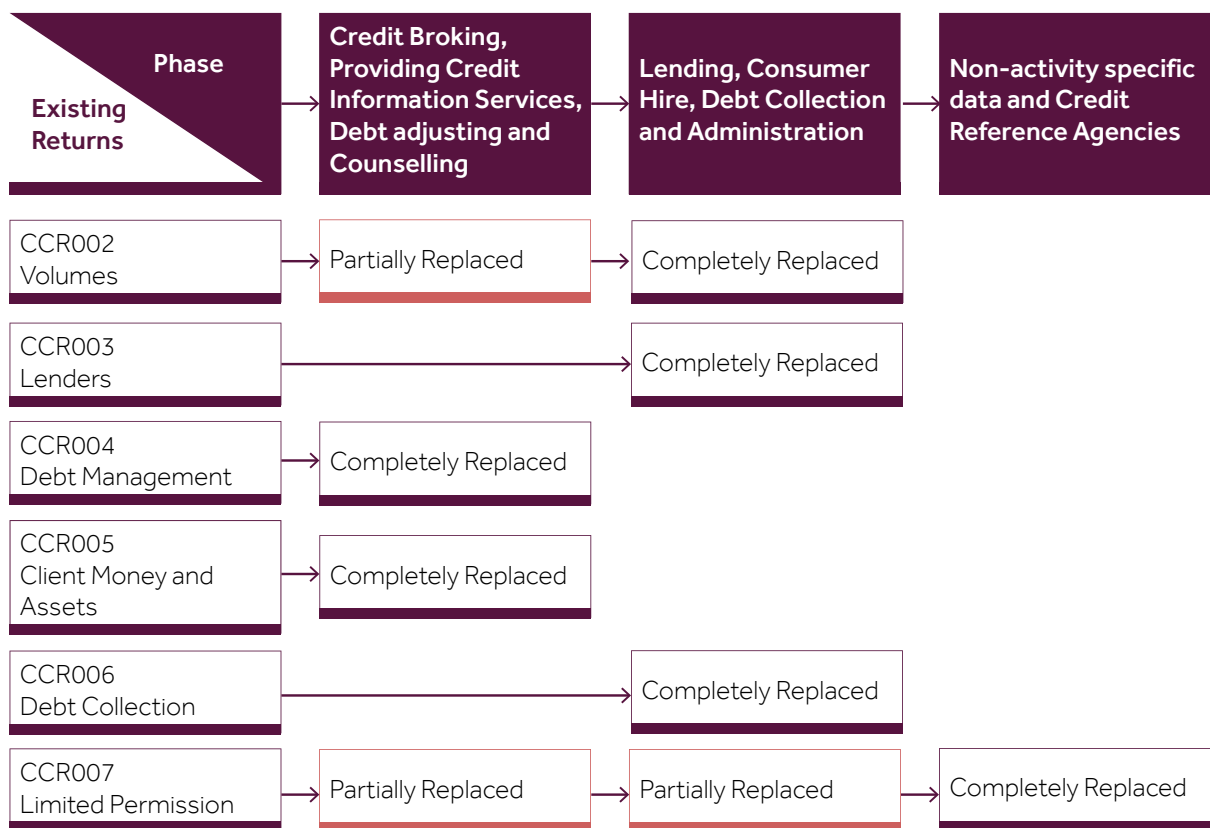
- 3.14** The two data collections were required due to the timing differences between the reporting period for CCR005 and the notification requirement in CASS 11.2.4R for the CASS Firm classification. By aligning the new return with the calendar year period, we will be able to obtain the relevant data from the aforementioned collections in one submission.
- 3.15** A section of the new return will include the following questions which will replace the questions in the existing CCR005 return and CASS survey:
- Select the option which describes you firm's regulated activity in relation to client money.
 - What was the balance of client money held as at the reporting period end?
 - .What was the highest total amount of client money held during the reporting period?
 - If the firm did not hold client money during the reporting period, please project what the firm will hold for the next calendar year.
 - What is your 'CASS debt management firm type' classification?
 - What was the highest number of clients for whom client money was held at any one time during the reporting period?
 - What was the balance of unallocated client money held as at the reporting period end which has remained unallocated for a period of 6 business days or more?

Overlap of some returns

- 3.16** The new return will also replace elements of CCR002 – Consumer credit data: Volumes and CCR007 – Consumer credit data: Key data for credit firms with limited permission. However, for threshold and fees data purposes, these returns will not be switched off and replaced entirely until the completion of all stages of this work.
- 3.17** For the avoidance of doubt and notwithstanding some overlap in the data elements, consumer credit firms will still be required to submit returns under:
- CCR001,
 - CCR002,
 - CCR003,
 - CCR006 and
 - CCR007
- where they are currently required to do so / as applicable.
- 3.18** Firms which engage in credit broking, debt adjusting, debt counselling or providing credit information services will also be required to complete applicable data elements under CCR009.
- 3.19** Where possible we have removed the ambiguity of using the generic term 'transactions' as a data item and replaced it with more relevant terminology to firms' business models such as introductions, referrals, or agreements.

3.20 We will continue to include and want to understand revenues from credit-related activities as an overall total figure and would also want firms to provide more detailed breakdown of revenues generated for their products, services, referrals and introductions that they undertake with their regulated activities.

3.21 The duplication or overlap between the returns is created as a result of moving away from the existing form structure to an activity specific return structure as well as reviewing the range of activities in two separate returns. This is an interim proposal and will be removed when the remaining credit related activities are reviewed as shown below. Our expectation is that this will be a single additional submission for the majority of firms before we fully transition to the new return structure.



Reporting frequency

3.22 We do not propose to change the current reporting frequency. Full permission firms with annual revenue from credit related regulated activities over £5m currently submit relevant regulatory returns on a 6-monthly basis. Full permission firms with annual revenue from these credit related activities up to and including £5m currently submit relevant regulatory returns on a 12-monthly basis.

3.23 Limited permission firms will continue with an annual reporting frequency, both for the return under CCR007 and for questions relevant to them under the CCR009 return.

3.24 We are proposing to change the scheduling of the returns and move from using firms' accounting reference date to the calendar year for all firms. Feedback from firms suggested this would make collating and submitting the data easier, make the data more consistent and increase the value we can receive from analysing it.

- 3.25** Each firm is required to submit a return on an individual basis even if they are part of a group.
- 3.26** We are also proposing a change for firms reporting on a 6-monthly basis. All reporting figures, either financial numbers (eg revenue) or numerical values (eg number of credit agreements), should be reported on a cumulative basis. The return for the first reporting period should include figures for January through to June. The return for the second 6-month period should include figures for the entire 12 months, January through to December. This avoids unnecessary amalgamation of the 2 periods for yearly totals figures and is in line with other similar regulatory returns reporting such as Retail Mediation Activities Return (RMAR).

Timelines for implementation

- 3.27** We have worked closely with external stakeholders, including firms, trade bodies, and charities across sectors. In setting out our expectations, we have been able to align our data requirements with the data external stakeholders already collect or could easily get without making significant changes to their reporting systems.
- 3.28** As such, we do not anticipate the new return will cause significant burden. So we are proposing that the rules come into effect immediately when we publish the Policy Statement which we expect to be early in Q1 2025. The first reporting period will cover 1 January to 31 December 2025. To reduce the burden on firms, we will increase the time given to submit the data from 20 business days to 40 business days from the end of the reporting period.
- 3.29** The first submission will be an annual submission for all firms. For those larger firms who will report 6 monthly, their first half yearly submission will cover 1 January to 30 June 2026.
- 3.30** These changes will have the effect of requiring firms to submit data partially covering a period before the rules coming into effect. However, we believe this data is readily available and easily collated. We welcome feedback on this including whether there are particular areas which may prove difficult or may not already be held.

Prototype of the returns and feedback gathering

- 3.31** In addition to setting out the proposed questions the return will include, we have also developed a prototype of the return. This prototype will allow firms to view the return in the way they will be required to submit the data in the future, including the branching logic used. This will allow them to understand exactly which questions will be relevant to their business and expected to be completed.
- 3.32** We will provide a link to this prototype to all firms who hold the relevant activities and strongly encourage firms to test it. This should benefit firms by:

- allowing firms to better understand the branching logic and visualise the future returns to provide feedback
- enabling firms to understand exactly which questions will be relevant for them in the future and which would not
- enabling firms to understand the context and supporting information for questions to aid their interpretation
- providing an opportunity to submit specific feedback on individual questions
- helping us to identify any questions which may pose challenges for firms to submit

3.33 Submitting data through the prototype will also allow us to ensure that the data we will collect meets our needs and potentially identify where questions we are asking may not do so. If the benefit we expect to receive from the data is not proportionate to the burden on firms in providing it, we can consider if it could be removed either for particular groups of firms or the market in general. This will allow us to better achieve some of our intended outcomes:

- data collections meet and are proportionate to regulators' needs
- efficient processes and support for meeting regulatory obligations
- clear and consistent data definitions
- modern systems to underpin data collections

3.34 Firms should submit data through the prototype to fully test it. While this data should be as close to accurate as possible for us to ensure the data meets the expectations of the collection, it will not be used for any supervisory purposes and is not expected to exactly match our proposed, or current, reporting requirements. Firms can submit estimates, historic data or unaudited management information which may not exactly match the data which they would be required to submit accurately under our rules.

Annex 1

Questions in this paper

- Question 1:** Do you agree with the questions, or data, proposed to be collected (e.g. 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 (e.g. 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?
- 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?
- Question 4:** Do you agree with the proposed timeline for implementing these returns?
- Question 5:** Do you agree with the proposed frequency of submissions, in line with a fixed calendar year?
- 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.
- 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?

Annex 2

Cost benefit analysis

Introduction

1. The Financial Services and Markets Act (2000) requires us to publish a cost benefit analysis (CBA) of our proposed rules. Specifically, section 138I requires us to publish a CBA of proposed rules, defined as 'an analysis of the costs, together with an analysis of the benefits that will arise if the proposed rules are made'.
2. This analysis presents the significant impacts of our proposal. We provide monetary values for the impacts where we believe it is reasonably practicable to do so. For others, we provide a qualitative explanation of their impacts. Our proposals are based on weighing up all the impacts we expect and reaching a judgement about the appropriate level of regulatory intervention.
3. The CBA has the following structure:
 - the market
 - problem and rationale for intervention
 - our proposed intervention
 - alternative options
 - Secondary International Competitiveness and Growth Objective
 - baseline and key assumptions
 - summary of impacts
 - costs
 - benefits
 - monitoring and evaluation

The Market

4. A well-functioning credit market contributes to economic growth and plays an important role in the everyday lives of consumers, helping them manage their money by offering a mechanism to smooth income and spread the cost of large purchases over a period of time. It is essential that consumers in the market are treated fairly and have access to information to make good financial decisions and get support at times of financial difficulty.
5. The consumer credit market specifically enables consumers to borrow money from firms to pay for goods and services, primarily offered as revolving or instalment credit. There are approximately 25,000 firms whose primary activities are related to consumer credit. These firms include, mainstream consumer credit lenders, retail lenders, motor finance providers, and debt advice firms, and the largest tend to be mainstream

consumer credit lenders offering multiple products from firms within their group. These firms offer a number of products, including overdrafts, credit cards and motor finance.

6. The changes we are proposing specifically affect firms engaged in credit broking, debt counselling or adjusting and/or providing credit information services. A number of firms in other sectors also engage in these activities, such as, Limited Permission secondary credit brokers, whose main business activity is the supply of non-financial services. We therefore expect our intervention to affect over 30,000 firms.
7. This market is significant; as of May 2024, there are over 120 million consumer credit agreements in the UK, and almost £229bn in outstanding credit balances, increased from around £214bn a year prior. Despite the rapid rise in the base rate over the past few years and consequent increase in the cost of servicing debt, the reach of the market has grown, suggesting greater consumer reliance on credit. The annual growth rate for all consumer credit remains positive at 8.4% (May 2024), up from 7.5% (May 2023).
8. According to our most recent Financial Lives Survey (2022), around 80% of UK adults hold a FCA-regulated credit product (May 2022). Credit cards (64%) and overdrafts (20%) remain the most common credit or loan product held by this group (May 2022). As of May 2024, the annual growth rate for credit card borrowing remains high at 10.8% (May 2024), and is likely to persist, as consumers navigate a challenging macroeconomic environment and incomes are squeezed.

Problem and rationale for intervention

9. As per our data strategy, data from firms is essential in building our understanding of how firms operate in the wider market. Up-to-date and good quality data is a significant, though not sole, factor for strengthening our decision-making process. We use data, along with our sectoral expertise and regulatory judgement, to improve the quality and depth of our ex-ante and ex-post impact analysis. Data helps us to better understand the root cause, severity, and scale of emerging and past harms. It is more likely we can then react faster to market changes and shifting priorities through our supervision and policy interventions.
10. For example, we can use data to assess where certain types of consumers are not able to access consumer credit products, and monitor the associated firms and their characteristics to determine the possible drivers of harm and remedy options.
11. At present, the FCA's data collection using regulatory returns from the consumer credit market is outdated and captures limited data from the dynamic business models of in-scope firms. The existing returns were designed in 2014 and have not been updated to reflect significant changes to firms, the market, or the FCA, over the past decade. Currently, the returns are general in approach and attempt to apply the same questions across all business models, leading to misinterpretations and inconsistent returns. Some of the data collected is no longer relevant and it can be challenging to understand how firms use their permissions, especially for Limited Permission firms with a non-financial primary business. Additionally, whilst some information on business models is initially

captured by Authorisations at the gateway, business models can change over time and we do not regularly collect this data again once firms are onboarded.

- 12.** Past experience indicates that having limited firm data can lead to:
- Slower identification of problems, such as firm failure and bad conduct, which may lead to a delayed response by the FCA and increase the risk of consumer harm.
 - Imperfect monitoring of markets which could lead to an improper understanding of ongoing access issues and systemic risks to firms and infrastructure. A delayed FCA response to these issues could threaten market integrity.
 - Increased firm burden from the ad hoc requests we need to issue to fill data gaps and understand emerging issues.
- 13.** Our proposal seeks to address these consequences of insufficient availability of consistent, accurate and relevant data from the consumer credit market, by issuing a new return covering contextual questions and specific data questions relevant to firms' business models. This will strengthen our understanding of the consumer credit market and support our continued transformation as a data-led regulator. We expect this will support us in making proportionate and evidence-based regulatory decisions, and assess outcomes against our Strategy and priorities, such as, reducing and preventing serious harm in markets.

Our proposed intervention

- 14.** We are proposing to introduce a new return for firms who hold permission for at least one of the activities of:
- providing credit information services
 - credit broking
 - debt counselling
 - debt adjusting

Currently, **30,321 firms hold at least one relevant permission** (around 70% of all FCA regulated firms). Credit broking is the most held relevant permission, with 28,586 firms (94%) holding this permission; see Table 1 below.

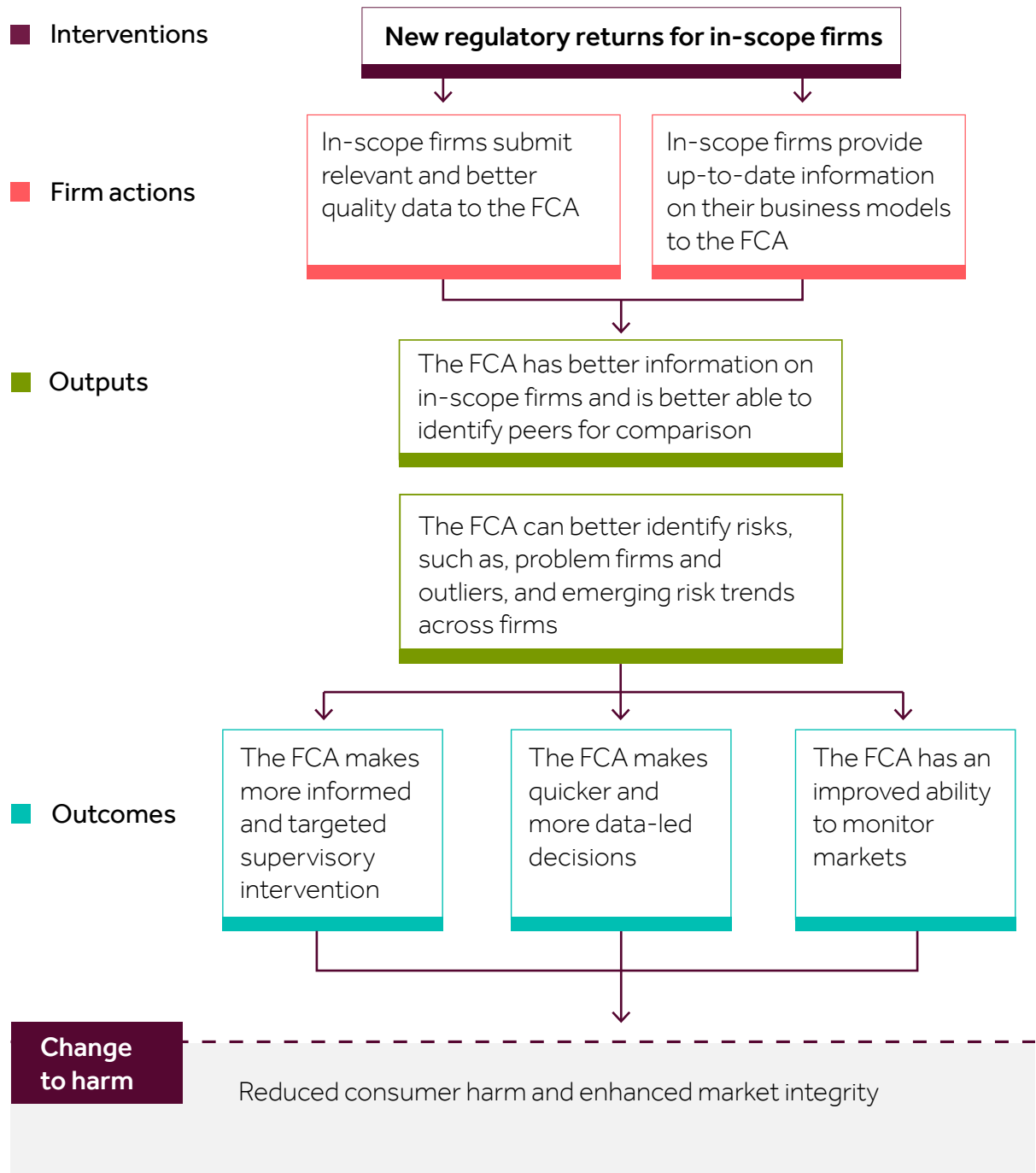
Table 1: Population of firms in-scope (2024 data)

Relevant permissions held	Number of firms		
	No other permission	Other permissions	Total
At least one relevant permission	19,171	11,150	30,321
Credit broking	18,296	10,290	28,586
Debt counselling or debt adjusting	11,815	6,574	18,389
Providing credit information services	989	1,082	2,071

Source: FCA internal data

15. We have used a Standardised Cost Model (SCM) to assign 58 (0.2%) of the in-scope firms as large, 260 (0.9%) as medium, and 30,003 (99.0%) as small (numbers do not sum to 100% due to rounding). More information on our SCM can be found in '[How we analyse the costs and benefits of our policies](#)'. To note, some of the in-scope firms are Limited Permission firms (firms who only carry out specific activities and are therefore subject to fewer threshold conditions than other firms).
16. We plan to introduce one new return with questions including contextual and data elements, and the questions will be customised by using branching logic according to the regulatory activities of responding firms. Our proposed return will replace some of the existing consumer credit reporting (CCR) returns for in-scope firms, although, we will not change the current reporting frequencies. We have developed our proposed return following extensive engagement with relevant stakeholders, taking on board feedback for the data collection process.
17. Compared to our existing data requests, in our new return, we will ask firms more relevant questions that are tailored to their activities. Therefore, we expect to receive better quality data from in-scope firms, and up-to-date information on their business models, which we do not obtain from our current returns. With improved data from in-scope firms, we will have a more accurate oversight of firms in the market and will be able to better identify risks, such as problem firms and outliers. This will support our decision-making and facilitate more pro-active, data-led supervision of in-scope firms, leading to quicker FCA responses to emerging harms. This can contribute to reducing consumer harm and enhancing market integrity, aligning with our objectives to protect consumers and make sure markets work well; see Figure 1 below.

Figure 1 Causal chain for intervention



Alternative options

18. In designing our proposed intervention, we considered but did not take forward the following options:

Ad hoc requests (no intervention)

19. Ad hoc data collections can enable us to fill data gaps on a small scale, as we have done in the debt advice sector over the last 18 months. Without our proposed intervention, firms will continue to submit the existing CCR returns as they currently do, alongside ad hoc data requests. For the collection of portfolios considered, the large number of in-scope firms will require extensive administrative FCA resources to collect ad hoc data. Giving firms more certainty in the timing and content of our data collections better equips them to make the process and system changes required to submit this data regularly, instead of organising a team of staff each time we ask for data. This reduces the burden on both firms and the FCA, rather than continuing with ad hoc data requests, and is more cost effective.

Incremental improvements of existing returns

20. We explored incremental improvements to the existing returns, such as, changes to the supporting guidance. However, these changes led to limited improvements in data quality and did not address most of the issues with the current data. Furthermore, making incremental changes is likely to lead to a higher overall cost for firms than making the changes in one go, as firms can combine governance and IT changes into one project rather than inefficiently spread across a number of changes.

Outsourcing to a third party (no intervention)

21. We have considered using third party data to fill existing data gaps, as we already receive reports from third parties which provide value by giving an oversight of markets and their key trends. However, the granular, firm-level data we require is not available through third parties. There is also a significant risk that data available may become unobtainable due to unexpected disruption to services or if third party data providers exit the market, so we cannot confidently rely upon this data.

Consumer Duty (no intervention)

22. Under the Consumer Duty, which sets clear standards of consumer protection, firms must act to deliver good consumer outcomes, including putting their customers' needs first. In addition, firms are required to monitor and maintain records of these outcomes, and this data can be requested by the FCA. This guidance is not an appropriate alternative to our proposal, as we need regulatory changes to secure more precise and timely data requirements to make sure that firms submit the most relevant data. However, through access to better data and consequently, improved data-led regulation, our proposal will help assess whether firms are meeting the higher standards of the Consumer Duty outcomes, including consumer access to fair value products and services.

Secondary International Competitiveness and Growth Objective

23. We believe the impact of these proposals will neither materially affect the international competitiveness of the UK economy, nor its growth in the medium to long term.

Baseline and key assumptions

24. We assessed the impacts of our proposed new return against a baseline, or 'counterfactual' scenario, which describes what we expect will happen in the market in the absence of our proposed policy change. We compare a 'future' under the new policy, with an alternative 'future' without the new policy. The baseline for our proposed change is that the in-scope firms continue to submit the existing CCR returns as they currently do, and we have the option for ad hoc data requests similar to the ones we have collected previously, and on subjects like fair value through our Consumer Duty. We assume that the RegData platform continues to be used for the relevant returns both in the baseline and if our proposed change is implemented.
25. We have assumed 100% compliance with our new intervention but acknowledge that historically this may not have always been the case. We expect costs to scale with compliance. We assume that the data inputted through the new return will be more accurate and better quality compared to the baseline. Whilst we expect data from our proposed return to improve our response to emerging harms, our intervention is also dependent on other factors, such as our capabilities and resources. There may also be some instances of harm which, even with the improved data, we will not observe or be able to react to quickly.
26. We have teams who have been using similar data through the ad hoc requests, also submitted via the RegData platform, which this new collection will largely be replacing. We have also already increased our resource as part of our wider data strategy and expect to reprioritise existing resource in relation to the new return. Therefore, we assume we are in a position to ingest and use this data as soon as the new return goes live.

Summary of impacts

27. We have quantified the costs to firms of compliance using our standardised cost model (SCM). More detail on our standardised cost model and why we use it can be found in '[How we analyse the costs and benefits of our policies](#)'. Across all in-scope firms, we expect compliance costs to be the most significant. These include total one-off costs across all firms of £18.3m associated with familiarisation and gap analysis and £27.0m for IT and change project costs, as shown in Table 2. We also estimate total ongoing costs (per annum) of £2.3m (in excess of what is currently spent responding to data collections this return will replace) for firms to collate and report the required data to the FCA. Cost estimates vary significantly by firm size and the average cost per firm associated

with our proposal is likely to be relatively small; see Costs section below where we have calculated costs per firm size in Table 4 and total costs in Table 5.

- 28.** Overall, we have estimated a total equivalent annualised net direct cost to firms of £7.5m from our proposed intervention. This value is what the cost per year to firms would be, if costs were spread evenly over the 10 year appraisal period, and discounted at 3.5% per year (as per our [CBA guidance](#)). It provides a comparable measure of cost between policies and policy options.
- 29.** We expect our proposed intervention to facilitate more effective and proportionate supervision, benefitting consumers through better consumer protection. Firms will benefit from simplified returns and less ad hoc data requests. It is not reasonably practicable to quantify and monetise the benefits of our proposal in full, but we have provided a qualitative assessment of impacts in the Benefits section below.

Table 2: Summary table of total estimated direct benefits and costs

		Costs (£m)		Benefits (£m)	
		One-off	Ongoing (annual)	One-off	Ongoing (annual)
Firms	Familiarisation and gap analysis	18.3			
	Change and IT costs	27.0			
	Collating and reporting data		2.3		
	Simplified data reporting process				Not quantified
Consumers	Prevention and reduction of consumer harm				Not quantified
	Enhancing market integrity				Not quantified
FCA	RegData platform and Data Lake build work	0.5			
Total		45.8	2.3		

Source: Standardised cost model (note: numbers slightly differ between Tables due to

rounding, costs are discounted at 3.5% per year as per our guidance: ‘How we analyse the costs and benefits of our policies’)

Table 3: Net costs by year

Year	1	2	3	4	5	6	7	8	9	10	Total value
Net Cost (£m)	47.5	2.3	2.3	2.3	2.3	2.3	2.3	2.3	2.3	2.3	67.8
Present value of net direct cost to business (£m)	47.5	2.2	2.1	2.0	2.0	1.9	1.8	1.8	1.7	1.7	64.6
Equivalent annual net direct cost to business (discounted) (£m)	7.5	7.3	7.0	6.8	6.5	6.3	6.1	5.9	5.7	5.5	64.6

Source: Standardised cost model (note: numbers slightly differ between tables due to rounding, costs are discounted at 3.5% per year as per our guidance: ‘How we analyse the costs and benefits of our policies’)

Costs

Direct costs to firms

- 30.** To complete our new return, we expect firms to have incremental one-off and ongoing costs, compared to the baseline. We have estimated these costs using our SCM and explain how we have done this below. Our SCM uses financial services wage data, and standard assumptions about staff required to perform certain tasks, informed by engagement with and surveying of industry. More information on our SCM can be found in ‘How we analyse the costs and benefits of our policies’.
- 31.** **Considering the one-off and ongoing costs together over a 10-year time period**, we have estimated a constant equivalent annual net direct cost to firms of £7.5m per year over a 10-year period from our proposed intervention (Table 3).

One-off familiarisation and gap analysis

- 32.** To make sure firms are compliant, they will have to familiarise themselves with the new rules and analyse what changes they will need to make in response to our new rules. We estimate the cost of this based on the length of the CP and the legal appendix, and how many staff we expect will need to read and analyse them. We assume more staff will be required where the changes are complex, and fewer where the changes are more straightforward.

- 33.** We anticipate on average a team of 6 compliance staff at large firms, 4 at medium firms, and 1.5 at small firms will need to read the CP, which we have estimated to be 40 pages long, taking 2 hours for each person to read. A further 2 legal staff at large firms, 1.5 at medium firms, and 1 at small firms will need to read the legal appendix and conduct gap analysis to determine where their current practices will need to change. We have estimated the legal appendix will be 100 pages long, taking each team member 28 hours at a large firm, 14 hours at a medium firm and 8 hours at a small firm to review the document. This creates one-off total costs across all firms of £18.3m for firms from familiarising with the new rules and conducting gap analysis. Tables 4 and 5 demonstrate how this cost is broken down between different sized firms.

One-off change and IT project costs

- 34.** We anticipate that firms will need to change IT systems to collect and report the required data, and these changes will require approval from senior decision makers. We categorise these costs as IT and change project costs.
- 35.** We expect total one-off IT and change costs of £27.0m across all firms associated with firms setting up systems to collate and report the relevant data, and the governance processes around the modification of reporting practices. This comes from IT and change projects requiring on average 7.5 person days at a large firm (1 person day is the cost of one person working for 1 day), 5 at a medium firm, and 3 at a small firm.
- 36.** On average across all in-scope firms, we expect one-off costs per firm of £600 for familiarisation and gap analysis, and £890 for change and IT costs, totalling £1,490. More information on these costs is provided in Tables 4 and 5 below.

Ongoing IT project costs

- 37.** Ongoing costs for firms are the costs associated with the additional staff time required to collate and report the data required to complete the new return on a periodic basis. We expect this will require 1 person day a year at large firms, 0.5 at medium firms, and 0.25 at small firms.
- 38.** Ongoing IT project costs total £2.3m per annum for all firms. We estimate ongoing annual costs of £70 per firm, on average across all firms. This cost will however differ depending on firm size (further detail in Tables 4 and 5).
- 39.** Whilst some firms may need to collate data across different systems, we expect that firms already hold the required information. We have also engaged with firms during the development of our proposal and do not expect the new return to necessitate wholesale changes in firms' systems.

Indirect costs to firms

- 40.** We do not anticipate indirect costs to firms arising from our proposed change. We also do not expect our proposed change to have a material negative impact on competition, as the additional costs to each firm are not expected to be large or present a significant additional barrier to entry for new firms.

Table 4: Estimated average costs per firm (£)

Costs	Small	Medium	Large	Average across all firms
Familiarisation and gap analysis	580	1,860	4,740	600
Change	300	740	1,180	300
IT	580	1,160	1,890	590
Ongoing	70	190	420	70

Source: Standardised cost model

Table 5: Estimated total costs (£m)

Costs	Small	Medium	Large	Total across all firms
Familiarisation and gap analysis	17.5	0.5	0.3	18.3
Change	8.9	0.2	0.07	9.1
IT	17.4	0.3	0.1	17.9
Ongoing	2.2	<0.1	<0.1	2.3

Source: Standardised cost model

Costs to consumers

41. We do not expect there to be direct costs to consumers from our proposed change and consumers will not be required to provide new information to firms. There may be indirect costs to consumers if firms pass costs on to consumers. The extent of any cost pass-through depends on several characteristics of the market in question, such as competitive structure and demand curvature, so it is not reasonably practicable to quantify. However, the costs to firms from our proposal are expected to be small, so any potential cost pass-through would also be small.

Costs to the FCA

42. There will be a one-off sunk cost around £0.45m to the FCA associated with the RegData platform and Data Lake build work. In the short run, there will likely be a cost of reprioritisation of resources associated with dealing with a higher volume of queries from firms as the new return is embedded, however, we do not believe it is reasonably practicable to estimate this.
43. In this sector, we have been using lower quality data from our existing returns and ad hoc data requests to evidence and analyse the potential impacts of our regulatory decisions. Therefore, there may be increased resourcing costs to the FCA from analysing better data from our new return. However, we expect this increase to be counterbalanced,

as we will save the time we currently spend manually cleaning poor quality data from our current returns. In addition, the new return will replace existing returns and a large proportion of our ad hoc data collections completed by our teams already doing analysis in this sector. We have also already increased our resource as part of our wider data strategy and expect to reprioritise existing resource in relation to the new return. Overall, we do not expect any new supervision or enforcement costs despite receiving better data through the new return.

Benefits

Benefits to consumers

- 44.** We expect our proposed new return to benefit consumers by facilitating more proactive, targeted and data-led supervision of the in-scope firms. Having access to more reliable data allows us to better monitor the risk of firm failure and act early to prevent emerging harm. It is not reasonably practicable to quantify and/or monetise these proposed benefits in full, as the positive outcomes of this intervention depends 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. It is not possible to know how we will intervene in the future without predicting future economic developments, and consumer and firm behaviour in response to these. However, we expect the new return to improve supervision over time, and consequently benefit consumers, through our regulatory actions to reduce harm.
- 45.** To contextualise the scale of these benefits to consumers, we have considered how many times we have intervened in the consumer finance sector, since the launch of our data strategy in January 2020. We estimate that we have intervened with a policy instrument 31 times and have opened approximately 11,000 supervisory cases where we consider the subject of the intervention would have had a material impact on consumers without action from us. In each case we require information to direct our actions. In previous cases, we may have had to delay our response to gather further data or rely on less data to act quickly. We do not expect that every one of these cases would've benefited from improved data, or that every future case and intervention will be improved/occur faster due to improved regulatory returns, but we do expect this will be beneficial to the outcomes of many cases and interventions similar to the 31 policy interventions and 11,000 supervisory interventions we reference.
- 46.** Below we explain how we expect our new return to prevent and reduce consumer harm through providing a clearer understanding of firms' business models, and lead to improved market integrity through better firm monitoring and identification of problems. We have a qualitative assessment (see below) of the potential benefits to consumers from our new return but cannot provide quantitative estimates. To better show how these benefits are delivered, and contextualise the potential scale of them, we have provided the benefits from using good data in our previous work. For example, approximately £18.8m has been paid to over 100,000 customers through our work using consumer credit data to improve the treatment of borrowers in financial difficulty. We expect to be able to replicate this across other projects utilising the data from the new return.

Prevention and reduction of consumer harm

- 47.** The contextual and data elements of our proposed new return will help us to have a clearer understanding of firms' business models, the scale of firms' regulated activities, and the sizes of in-scope firms in the credit market. More accurate, reliable, and consistent data will improve our monitoring of the wider market to quickly identify and remedy any emerging harms. This will aid better FCA supervision, leading to more effective and proportionate regulatory decision-making.
- 48.** We can draw upon our previous work to contextualise how our new return could benefit consumers. One example is the Cost-of-Living Forbearance (COLFOR) project. With high inflation and rising interest rates, our concerns that consumers might be struggling to repay loans were confirmed by the intelligence we received through engagement with firms and consumer groups. In particular, we were concerned about outcomes for consumers at risk of financial difficulty, however, our existing data did not allow us to identify the outcomes for these consumers or how many there were at each firm. We used an ad hoc request to ask firms for information about the number of consumers in arrears and the actions they had taken. Through this, we were able to identify firms which we believed had higher numbers of customers at risk of financial difficulty and assess whether these firms were providing fair and sustainable forbearance. As a result of our intervention, firms have undertaken remedial action to improve their treatment of borrowers in financial difficulty and to provide redress to those customers who were treated unfairly when seeking financial help. To date, approximately £18.8m has been paid to over 100,000 customers, a figure which will increase throughout 2024 and into 2025 as firms complete their work.
- 49.** Another example is the FCA's work in the motor finance market where we analysed sample firm data on staff incentives and sales channels to identify high risk incentives and remuneration schemes which significantly increased the risk of poor consumer outcomes. We used the data to extrapolate findings across the wider population and identify populations of firms which were more likely to cause harm to consumers. This work led to the introduction of new rules and guidance around staff incentives and risk management, which reduced the likelihood of mis-selling and improved outcomes for consumers. We estimated that consumers across the motor finance market were potentially paying around £500m in higher interest costs annually and later banned discretionary commission models in motor finance.
- 50.** Where we have not had the right data, and failed to collect it, this has led to harm to consumers. For example, the collapse of London Capital and Finance (the so called 'mini-bond' scandal) left 14,000 bondholders owed significant sums. In total, £173m has been repaid to bondholders through FSCS administered schemes. While this harm occurred due to a number of factors, including procedural failures, the Gloster review into our handling of the collapse recommended that similar cases could be avoided in the future through consideration of a firm's business model holistically and proper analysis of a firm's financial information. The proposed collection will further help us to do this for consumer credit firms.
- 51.** Firm data from our existing returns is generally outdated, incomplete, or poor quality. As a result, we often rely upon ad hoc data collections to fill these data gaps, including in the examples above. This increases the resourcing burden on firms and the FCA,

as the requests are unexpected and separate to regular returns, further delaying our response to emerging harms. We expect our new return to provide consistent firm data, supporting us to identify and remedy market harms more quickly. This also aligns with our response to recommendations from the Gloster Review, such as, storing all relevant firm data in the Data Lake and enabling staff involved in the day-to-day supervision and authorisation of firms to better monitor identified business model risks. More reliable data from our new return will also support us in confidently prioritising our work which tackles the greatest harms to consumers.

- 52.** With more relevant data, we will also have a better understanding of how firms use their permissions and more quickly identify firms who are not using their permissions, enabling us to take appropriate action, and support work such as the 'use it or lose it' campaign. Acting quickly to remove unused or inappropriate permissions strengthens the credibility of authorised firms and the trust of consumers. This will help to reduce the likelihood of consumers misunderstanding their exposure to financial risk from unregulated activities and improve consumer protection.

Enhancing market integrity

- 53.** One of our operational objectives is to protect and enhance the integrity of the UK financial system, and to make sure that markets are effective, efficient, and reliable. This supports an environment where consumers can place their trust in the market. With more up-to-date and accurate data of firms' business models and activities, we will have a stronger understanding of how firms operate in this market, where potential weaknesses which may threaten stability are present, and help us shine a light on poor practice.
- 54.** Considering the work we did as part of the COLFOR project, identifying firms with high numbers of customers in arrears allowed us to support these firms and their consumers, avoiding disorderly firm failure. Similarly, data on the motor finance market allowed us to identify a potential emerging threat to market integrity from increasing numbers of complaints. Understanding past business models and practices was key to identifying the potential scale of this issue, and this data came from an ad hoc request to those firms. On the basis of this data, we intervened in January 2024 to reduce the risk of disorderly outcomes for consumers and the wider market. We anticipate that better data on consumer credit firms and their customers will help us to intervene to protect and enhance market integrity where appropriate in future.

Benefits to firms

- 55.** It is not reasonably practicable to estimate the benefits to firms, but we expect firms to benefit from the simplified data collection process in the new return, which uses branching logic to tailor questions towards individual firms. More effective supervision will also improve targeted firm engagement and we expect to reduce the number of ad hoc data requests that we issue to firms. Whilst we have estimated firm ongoing costs to increase in the short run by £2.3m (see Costs section), the new return is likely to make the data request process more efficient and reduce staffing costs for firms in the long run, compared to the baseline.

Benefits to the FCA

- 56.** Reducing our reliance on ad hoc data to fill data gaps should be more cost effective and limit the burden on our resources, as we will have regular data collections in place. By simplifying the existing returns, clarifying its contents, and putting in place verification checks, to help firms confirm they are submitting data correctly, we expect to spend less resource in the long run following up with firms who have failed to submit a return or have done so incorrectly.

Monitoring and evaluation

- 57.** It is difficult to measure a direct causal path from collecting better consumer credit data to the benefits, as this depends on how the data is used, for example through our future policy interventions which draw upon the data. However, we will monitor how frequently the new returns are used in policy and supervisory interventions, and the consequent reduction in harm through these interventions. We will also monitor compliance through improvements in returns compliance and data quality metrics for the returns data.

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?

Annex 3

Compatibility statement

Compliance with legal requirements

1. This Annex records the FCA's compliance with several legal requirements applicable to the proposals in this consultation, including an explanation of the FCA's reasons for concluding that our proposals in this consultation are compatible with certain requirements under the Financial Services and Markets Act 2000 (FSMA).
2. When consulting on new rules, the FCA is required by section 138I(2)(d) FSMA to include an explanation of why it believes making the proposed rules (a) is compatible with its general duty, under section 1B(1) FSMA, so far as reasonably possible, to act in a way which is compatible with its strategic objective and advances one or more of its operational objectives, (b) so far as reasonably possible, advances the secondary international competitiveness and growth objective, under section 1B(4A) FSMA, and (c) complies with its general duty under section 1B(5)(a) FSMA to have regard to the regulatory principles in section 3B FSMA. The FCA is also required by s 138K(2) FSMA to state its opinion on whether the proposed rules will have a significantly different impact on mutual societies as opposed to other authorised persons.
3. This Annex also sets out the FCA's view of how the proposed rules are compatible with the duty on the FCA to discharge its general functions (which include rule-making) in a way which promotes effective competition in the interests of consumers (section 1B(4)). This duty applies in so far as promoting competition is compatible with advancing the FCA's consumer protection and/or integrity objectives.
4. In addition, this Annex explains how we have considered the recommendations made by the Treasury under s 1JA FSMA about aspects of the economic policy of His Majesty's Government to which we should have regard in connection with our general duties.
5. This Annex includes our assessment of the equality and diversity implications of these proposals.
6. Under the Legislative and Regulatory Reform Act 2006 (LRRRA) the FCA is subject to requirements to have regard for a number of high-level 'Principles' in the exercise of some of our regulatory functions and to have regard to a 'Regulators' Code' when determining general policies and principles and giving general guidance (but not when exercising other legislative functions like making rules). This Annex sets out how we have complied with requirements under the LRRRA.

The FCA's objectives and regulatory principles: Compatibility statement

- 7.** The proposals set out in this consultation are primarily intended to advance the FCA's operational objective of:

 - Delivering consumer protection – securing an appropriate degree of protection for consumers
 - Enhancing market integrity – protecting and enhancing the integrity of the UK financial system
 - Building competitive markets – promoting effective competition in the interests of consumers
- 8.** These proposals will provide us more consistent and detailed data to better supervise the markets in scope, as detailed in Chapter 3. This will support us to protect and enhance market integrity by allowing us to make quicker and more effective decisions ensuring the market is functioning well. We will also be better able to actively monitor these markets to make sure competition is working well for consumers and allows for new entrants. This will also contribute to increased consumer protection as we will be better able to identify risk of and prevent harm.
- 9.** With regards to our secondary objective (SICGO) to facilitate international competitiveness and growth, and the Treasury's Remit Letter of December 2022, we believe that the impact of these proposals will neither materially affect the international competitiveness of the UK economy, nor its growth in the medium to long term. However, we believe our proposals will improve the FCA's operational efficiency by enabling us to monitor and supervise these markets more efficiently. This should indirectly promote market integrity, by adding trust and confidence in the markets and making the UK an attractive place for firms and investors, which is conducive to the competitiveness and growth of the market as a whole.
- 10.** Although the policy does not materially affect either international competitiveness or growth, it is justified for the reasons set out under the key benefits in Chapter 2 and the CBA of this CP, including the prevention and reduction of consumer harm, improved firm experience and facilitating the delivery of a data-led supervision approach for the consumer credit market.
- 11.** We consider these proposals are compatible with the FCA's strategic objective of ensuring that the relevant markets function well because the collection of accurate, consistent, and reliable data will allow us to effectively monitor compliance with regulatory requirements and identify risks in the consumer credit market. For the purposes of the FCA's strategic objective, "relevant markets" are defined by section 1F FSMA. In preparing the proposals set out in this consultation, the FCA has had regard to the regulatory principles set out in s 3B FSMA. The relevant regulatory principles are considered below.

The need to use our resources in the most efficient and economic way

12. We are increasingly reliant on data to make quicker, more effective decisions. However, our current regulatory returns for these markets have gaps or yield inconsistent data, which hinders our ability to successfully supervise these firms. Consequently, we need to employ alternative methods such as ad hoc information requests to firms to obtain necessary information. Our proposed return will allow us to understand firms' products and business models more accurately and provide a systematic way to identify outlier firms. This will enable us to target our resources and prioritise riskier areas to supervise these markets more efficiently.

The principle that a burden or restriction should be proportionate to the benefits

13. We have carefully considered the proportionality of our proposals, including through consultation with internal and external stakeholders throughout the development of the new return. While we recognise that the new return will consist of more questions and there will be a cost for firms in implementing the proposals, we consider that the benefits will outweigh these costs as they will:
- Enable us to gather accurate and consistent data to effectively supervise these markets better
 - Enable us to prioritise and target our resources more efficiently
14. Moreover, we consider that firms will benefit from completing simplified returns and receiving less ad hoc data requests from us.
15. The CBA in Annex 2 discusses in further detail the costs and benefits to firms.

The need to contribute towards achieving compliance by the Secretary of State with section 1 of the Climate Change Act 2008 (UK net zero emissions target)

16. This principle is not relevant to our proposals.

The general principle that consumers should take responsibility for their decisions

17. Our regulatory return will provide more insight into firms' products and business models, which will help us better understand consumers' options and the decisions they make as well as how they might take more responsibility for their decisions. Our proposals do not inhibit consumers' ability to purchase the products they wish to purchase, nor do they seek to remove from consumers the need to take responsibility for their own decisions.

The responsibilities of senior management

- 18.** Relevant senior management will need to ensure that their firm complies with our proposed rules, having regard to their responsibilities under the senior managers and certification regime (SMCR), which has applied to most authorised firms since 9 December 2019.

The desirability of recognising differences in the nature of, and objectives of, businesses carried on by different persons including mutual societies and other kinds of business organisation

- 19.** We recognise that these consumer credit markets contain firms with different capabilities and business models. Our proposals include branching logic which is intended to reduce the reporting burden on firms. This will be particularly beneficial for smaller firms and those with limited permissions, by targeting specific questions to the firm's business model and removing questions that would not apply to them.

The desirability of publishing information relating to persons subject to requirements imposed under FSMA, or requiring them to publish information

- 20.** We have had regard to this principle and believe our proposals are compatible with it. We may publish data on aggregate trends in the consumer credit market.

The principle that we should exercise of our functions as transparently as possible

- 21.** Our data reporting requirements are published, and therefore transparent to firms and consumers.
- 22.** As this CP is part of our multi-year review of our existing consumer credit regulatory returns, we signalled our intention to deliver more data-led supervision by reviewing our current regulatory return including for this sector in September 2023 via CP23/21. We have since worked with those in industry to understand how to shape our proposals by hosting several workshops with stakeholders including firms and trade bodies across markets and various business models. We will continue to do so as part of this consultation process. In addition to the information and questions we have provided in this CP, we are also inviting respondents to review and test the questions as they will be set out in new return via our Qualtrics survey.
- 23.** In formulating these proposals, the FCA has had regard to the importance of taking action intended to minimise the extent to which it is possible for a business carried on (i) by an authorised person or a recognised investment exchange; or (ii) in contravention of the general prohibition, to be used for a purpose connected with financial crime (as required by s 1B(5)(b) FSMA). The data collected will enable us to more effectively identify and prevent financial crime, particularly in relation to how firms are operating and using their permissions for credit broking, debt adjusting, debt counselling, and providing credit information services.

Expected effect on mutual societies

- 24.** The FCA does not expect the proposals in this paper to have a significantly different impact on mutual societies. Our proposals will apply equally, regardless of whether it is a mutual society, to any regulated organisation offering credit broking, debt counselling, debt adjusting, or providing credit information services.
- 25.** While the new return may ask respondents to provide more information than our previous returns, we are requesting information most mutual societies will already have to hand and so do not expect this will be particularly burdensome for mutual societies. We also expect that the branching logic feature will make it easier for mutual societies to fill in our return as the questions they are presented will adjust to suit their business models.

Compatibility with the duty to promote effective competition in the interests of consumers

- 26.** In preparing the proposals as set out in this consultation, we have had regard to the FCA's duty to promote effective competition in the interests of consumers. In relation to competition, we do not expect that the proposed changes will affect the number of firms providing these consumer credit activities, or their incentives to compete with each other for customers.

Equality and diversity

- 27.** We are required under the Equality Act 2010 in exercising our functions to 'have due regard' to the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by or under the Act, advance equality of opportunity between persons who share a relevant protected characteristic and those who do not, to and foster good relations between people who share a protected characteristic and those who do not.
- 28.** As part of this, we ensure the equality and diversity implications of any new policy proposals are considered.

Legislative and Regulatory Reform Act 2006 (LRRRA)

- 29.** We have had regard to the principles in the LRRRA and Regulators' Code (together the 'Principles') for the parts of the proposals that consist of general policies, principles or guidance. We consider that our proposals are compliant with these Principles.
- 30.** **Transparent** – We are consulting on our proposed changes with industry to articulate our proposals. In the consultation, we provide our rationale for introducing a new return to collect data from firms that engage in any one or more of the regulated activities

of credit broking, debt counselling, debt adjusting, and providing credit information services (Relevant Ancillary Credit Firms). Through consultation and pro-active engagement both before and during consultation, we have been transparent and provided a simple and straightforward way to engage with the regulated community.

- 31. Accountable** – We are consulting on these changes and will publish final rules after considering all feedback received. We are acting within our statutory powers, rules and processes.
- 32. Proportionate** –The returns apply only to Relevant Ancillary Credit Firms and reporting frequencies are differentiated based on firms' revenues. As we do not anticipate the new return will cause significant burden the new rules will take effect immediately on publication of the Policy Statement and will still provide firms with sufficient time to implement changes. We do not anticipate that the new return will cause significant burden on firms and will increase the response timeframes from 20 business days to 40 business days from the end of the reporting period. We have also provided our CBA in the CP which sets out further detail on the costs and benefits of our proposals. We also propose to use branching logic in the new return to ensure firms are only required to answer questions which apply to them.
- 33. Consistent** – Our approach would apply in a consistent manner across Relevant Ancillary Credit Firms. This will produce more reliable and consistent data, which will result in a more consistent and accurate regulatory oversight of consumer credit markets that will benefit both firms and consumers.
- 34. Targeted** – In considering which firms would be in scope of our proposed new reporting requirements, we have considered where our supervision as well as the markets would benefit most. This includes enhancing our ability to provide targeted firm engagement and consideration on how to best deploy our resources.
- 35. Regulators' Code** – Our proposals are carried out in a way that supports firms to comply and grow through our consideration of their feedback via the CP and refining our proposals where necessary. Our CP, CBA, draft instrument, accompanying annexes, public communications and communications with firms are provided in a simple, straightforward, transparent and clear way to help firms meet their responsibilities.

Annex 4

Abbreviations used in this paper

Abbreviation	Description
CBA	Cost Benefit Analysis
CCR	Consumer Credit Reporting
COLFOR	Cost-of-Living Forbearance
CP	Consultation Paper
ESG	Environmental, Social and Governance
FSMA	Financial Services and Markets Act 2000
LRRA	Legislative and Regulatory Reform Act 2006
OFT	Office of Fair Trading
PSD	Product Sales Data
RMAR	Retail Mediation Activities Return
SCM	Standardised Cost Model
SICGO	Secondary International Competitiveness and Growth Objective
SMCR	Senior Managers and Certification Regime

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Appendix 1

Draft Handbook text

CONSUMER CREDIT (REGULATORY REPORTING) (No 2) INSTRUMENT 2024**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 [*date*].

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) (No 2) Instrument 2024.

By order of the Board
[*date*]

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

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

<i>relevant ancillary credit firm</i>	<i>a firm which has permission to carry on any of the following regulated activities:</i> <ul style="list-style-type: none">(a) <i>credit broking;</i>(b) <i>debt adjusting;</i>(c) <i>debt counselling; or</i>(d) <i>providing credit information services.</i>
---------------------------------------	---

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~~ in 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 first 40 business days of January 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 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 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 return~~ 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	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 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>			
...				
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	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]			
...				

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 months 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 months. 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>(a) <u>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>(b) <u>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>(c) <u>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>(d) <u>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. The reporting frequencies for these returns are calculated from and inclusive of 1 January and 30 June respectively.</u></p> <p>(e) <u>The submissions that a <i>firm</i> in (d) must make are in respect of:</u></p> <p style="padding-left: 40px;">(i) <u>the 6-month period beginning on 1 January and ending on 30 June; and</u></p> <p style="padding-left: 40px;">(ii) <u>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 [Editor's note: insert commencement date of this instrument] 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.</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 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 <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 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 <i>firm</i> which becomes a <i>relevant ancillary credit firm</i> 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>

...

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 38C and SUP 16 Annex 38D. The text is not underlined.

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

- R This is the annex referred to in SUP 16.12.29CR. It can be found through the following address:
 [Editor's note: insert link]

The following data reporting fields must be completed, where applicable, for all reportable transactions.

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

CCR009 Consumer Credit data: relevant ancillary credit firm

Reporting fields for a firm with permission to carry on the regulated activity of credit broking		
Section 1: Credit broking – permissions		
Tell us about your permissions. Some questions will only apply if you have not undertaken or do not intend to undertake any credit regulated activities.		
Reference	Data reporting field	Code (where applicable)
DR001	Our systems show that you have the credit broking permission. Which of the following activities have you undertaken?	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
DR002	For the next reporting period, do you intend to undertake any of the following activities?	A - Introducing a consumer to a 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
DR003	Why have you not used your permission?	A - Applied to cancel B - Have been asked to hold permission by another firm to comply with a Competition and Markets Authority (CMA) ruling regarding high-cost firms C - Have been asked to hold permission at the request of a lender in order to be on their panel D - As a mortgage broker, hold permission to arrange loans secured on homes, and does not arrange any consumer credit finance E - Other reason
DR003a	If you have selected 'E - Other reason', please specify why you have not used your permission	[Free text]
DR004	Do you engage in a credit broking activity in respect of any of the following financial products to consumers?	A - Personal loans B - Credit cards C - Overdrafts D - Mortgages E - Premium finance insurance F - Any other credit agreements G - Finance for a specific good or service
<p>Section 1.1: Credit broking – financial products (apart from finance for goods and services)</p> <p>Tell us about the financial products you broker finance for. This section only applies if you do not broker finance for specific goods and services.</p>		
<p>Please provide us with the following information:</p> <ul style="list-style-type: none"> • DR005 – Total number of credit agreements • DR006 – Total value of credit agreements (£) 		

- DR007 – Maximum value of finance entered into (£)
- DR008 – Minimum value of finance entered into (£)
- DR009 – Average value of finance entered into (£)
- DR010 – Maximum APR (%)
- DR011 – Minimum APR (%)
- DR012 – Average APR (%)
- DR013 – Maximum term of agreement (months)
- DR014 – Minimum term of agreement (months)
- DR015 – Average term of agreement (months)

This information is to be provided for each of the financial products reported in DR004.

Section 1.2: 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		Code (where applicable)
DR016	Which of the following goods and services relates to your firm's engagement in a credit broking activity?	A - Goods - Motor vehicles B - Goods - Mobility aids C - Goods - Home improvement D - Goods - Mobile phones E - Goods - Jewellery and watches F - Goods - Household goods G - Goods - Sports and leisure goods H - Goods - Mobile homes I - Goods - Tools J - Goods - Agriculture equipment and supplies K - Goods - Other plant machinery L - Goods - Office equipment M - Goods - Health care and medical care equipment N - Goods - Other O - Services - Health care and medical care

		<p>P - Services - Education and training</p> <p>Q - Services - Travel</p> <p>R - Services - Insurance premiums</p> <p>S - Services - Membership and subscription fees</p> <p>T - Services - Other</p>
DR017	Does your firm supply any of the following goods to consumers?	<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 goods</p> <p>G - Sports and leisure goods</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>N - Other</p> <p>O - Our firm does not supply goods to consumers</p>
DR018	Does your firm supply any of the following services to consumers?	<p>A - Health care and medical care</p> <p>B - Education and training</p> <p>C - Travel</p> <p>D - Insurance premiums</p> <p>E - Membership and subscription fees</p> <p>F - Other</p> <p>G - Our firm does not supply services to consumers</p>
<p>Section 1.2.1: Credit broking – motor vehicles</p> <p>This section only applies if your credit broking activity is related to motor vehicles.</p>		

Reference	Data reporting field	Code (where applicable)
DR019	Which of the following types of vehicles are sold under an agreement in respect of which your firm engaged in a credit broking activity?	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 J - Other
DR020	What is the condition of vehicles sold under an agreement in respect of which your firm engaged in a credit broking activity?	A - New B - Used C - Unknown
DR021	Which types of finance are available on the vehicles you sell on finance?	A - Hire purchase (HP) B - Personal contract purchase (PCP) C - Personal contract hire (PCH) D - Personal loan
Section 1.2.2: Credit broking – financial products (motor vehicles)		
Tell us about the vehicles you supply on credit. This section only appears for credit agreements relating to motor vehicles.		
Please provide us with the following information:		
<ul style="list-style-type: none"> • DR022 – Total number of credit agreements • DR023 – Total value of credit agreements (£) • DR024 – Maximum value of vehicle on finance (£) 		

- DR025 – Minimum value of vehicle on finance (£)
- DR026 – Average value of vehicle on finance (£)
- DR027 – Maximum APR (%)
- DR028 – Minimum APR (%)
- DR029 – Average APR (%)
- DR030 – Maximum term of agreement (months)
- DR031 – Minimum term of agreement (months)
- DR032 – Average term of agreement (months)

This information is to be provided for the vehicle types reported in DR019.

Section 1.2.3: Credit broking – motor vehicles on consumer hire

Tell us about the vehicles you supply on consumer hire agreements. This section only applies for hire agreements relating to motor vehicles.

Please provide us with the following information:

- DR033 – Total number of hire agreements
- DR034 – Total value of hire agreements (£)
- DR035 – Maximum value of vehicle on finance (£)
- DR036 – Minimum value of vehicle on finance (£)
- DR037 – Average value of vehicle on finance (£)
- DR038 – Maximum term of agreement (months)
- DR039 – Minimum term of agreement (months)
- DR040 – Average term of agreement (months)

This information is to be provided for the vehicle types reported in DR019.

Tell us about the settlements you make on part exchange vehicles on finance. This section only applies if your credit broking activity is related

Reference	Data reporting field	Code (where applicable)
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DR041	Total number of settlements made involving a part-exchange of a vehicle on finance	[Enter value]
DR042	Total value of all settlements made involving a part-exchange of a vehicle on finance	[Enter value]
DR043	Average value of a settlement made involving a part-exchange of a vehicle on finance	[Enter value]
Section 1.4: Credit broking – goods and services (general)		
Reference	Data reporting field	Code (where applicable)
DR044	What finance is available on the goods and services you sell?	A - Hire purchase B - PCP C - Conditional sale D - P2P E - Other fixed sum credit agreements F - Running account credit G - Hire
Section 1.4.1: Credit broking – credit agreements (non-motor related goods and services)		
Tell us about the goods or services and finance you supply on credit agreements. This section only appears for credit agreements relating to		

Please provide us with the following information:

- DR045 – Total number of credit agreements
- DR046 – Total value of credit agreements (£)
- DR047 – Maximum value of finance entered into (£)
- DR048 – Minimum value of finance entered into (£)
- DR049 – Average value of finance entered into (£)
- DR050 – Maximum APR (%)
- DR051 – Minimum APR (%)
- DR052 – Average APR (%)
- DR053 – Maximum term of agreement (months)
- DR054 – Minimum term of agreement (months)
- DR055 – Average term of agreement (months)

This information is to be provided for the goods and services reported in DR016.

Section 1.4.2: Credit broking – consumer hire agreements (non-motor related products and services)

Tell us about the goods or service you supply on consumer hire agreements. This section only applies for hire agreements relating to goods and services (apart from motor vehicles).

Please provide us with the following information:

- DR056 – Total number of hire agreements
- DR057 – Total value of hire agreements (£)
- DR058 – Maximum value of finance entered into (£)
- DR059 – Minimum value of finance entered into (£)
- DR060 – Average value of finance entered into (£)
- DR061 – Maximum term of agreement (months)
- DR062 – Minimum term of agreement (months)
- DR063 – Average term of agreement (months)

This information is to be provided for the goods and services reported in DR016.

Section 1.5: Credit broking – supplementary		
Tell us about any extras or add-ons which your firm sells in support of the main good or service.		
Reference	Data reporting field	Code (where applicable)
DR064	What extras or add-ons does your firm sell in support of the main good or service, not included as part of the credit agreement or consumer hire agreement?	A - Regulated insurance product to cover goods or parts B - Non-regulated warranty or service product provided by the firm C - Non-regulated warranty or service product provided by a third party D - None of above
DR065	What extras or add-ons does your firm sell in support of the main good or service, included as part of the credit agreement and consumer hire agreements?	A - Regulated insurance product to cover goods or parts B - Non-regulated warranty or service product provided by the firm C - Non-regulated warranty or service product provided by a third party D - None of above
Section 1.6: Credit broking – relationships and commissions between lenders, brokers and owners		
Tell us about the lenders, brokers and owners your firm introduces to.		
Reference	Data reporting field	Code (where applicable)
DR066	Who does your firm engage with in relation to your credit broking activities to consumers for the purposes of obtaining credit?	A - Lenders unrelated to your firm B - Lenders within the same group C - Brokers unrelated to your firm D - Brokers within the same group E - Owners (consumer hire) unrelated to your firm F - Owners (consumer hire) within the same group G - None

Section 1.6.1: Credit broking – relationships and commissions between lenders, brokers and owners (introductions)

Tell us about the details of the introductions.

Please provide us with the following information:

- DR067 – Total credit revenue (£)
- DR068 – Total commission (£)
- DR069 – Total fees from consumers (£)
- DR070 – Other income received (£)
- DR071 – Total successful introductions
- DR072 – Total declined introductions
- DR073 – Total non-successful introductions
- DR074 – Total introductions

This information is to be provided in relation to the lenders, brokers and owners you engage with under DR066.

Section 1.6.2: Credit broking – relationships and commissions with 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.

Please provide us with the following information:

- DR075 – Name of lender
- DR076 – Firm reference number (if applicable)
- DR077 – Total successful introductions
- DR078 – Total declined introductions
- DR079 – Total non-successful introductions
- DR080 – Total introductions
- DR081 – Revenue (£)

This information is to be provided in relation to the lenders you engage with under DR066.

Section 1.6.3: Credit broking – relationships and commissions with brokers

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

Please provide us with the following information:

- DR082 – Name of broker
- DR083 – Firm reference number (if applicable)
- DR084 – Total successful introductions
- DR085 – Total declined introductions
- DR086 – Total non-successful introductions
- DR087 – Total introductions
- DR088 – Revenue (£)

This information is to be provided in relation to the brokers you engage with under DR066.

Section 1.6.4: Credit broking – relationships and commissions with owners

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

Please provide us with the following information:

- DR089 – Name of owner
- DR090 – Firm reference number (if applicable)
- DR091 – Total successful introductions
- DR092 – Total declined introductions
- DR093 – Total non-successful introductions
- DR094 – Total introductions
- DR095 – Revenue (£)

This information is to be provided in relation to the owners you engage with under DR066.

Section 1.7: Credit broking – declines		
Tell us about declines following an introduction.		
Reference	Data reporting field	Code (where applicable)
DR096	Does your firm introduce consumers that a lender or owner has declined for credit to another broker or lender outside of your standard panel?	Yes/No
Section 1.8: Credit broking – firm remuneration		
Tell us about how your firm is remunerated.		
Reference	Data reporting field	Code (where applicable)
DR097	How is your firm remunerated for its credit broking activities?	A - Flat fee for click through B - Flat fee for introduction C - Flat fee for successful credit agreement entered D - Percentage of transaction value E - Other F - No remuneration
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 credit broking activities.		
DR098	Please provide your revenue for each channel as reported in DR097.	[Enter value]

DR099	Does your firm proactively notify consumers that you receive commission from the lender or owner?	Yes/No
DR100	Does your firm proactively tell consumers the value (or percentage) of the commission you receive?	Yes/No
DR101	Does your firm charge consumers fees for brokering finance?	Yes/No
DR102	When does your firm charge the consumer fees for brokering finance?	A - On initial contact with the consumer B - Following introduction to a lender C - Following introduction to another credit broker D - Once the customer has been presented with the broker's terms and conditions E - Following provision of advice/recommendation to the customer F - Following entry into a credit agreement G - Other
Section 1.9: Credit broking – sales channels		
Tell us about your sales channels.		
Reference	Data reporting field	Code (where applicable)
DR103	Which of the following channels have consumers used to purchase your	A - Online B - E-mail C - Telephone D - At your own physical premises, such as a store or dealership

	products or services on credit?	E - In a consumer's home or dwelling F - Other non-trade premises
Section 1.9.1: Credit broking – accepted referrals and agreements		
Tell us about the referrals/agreements accepted per channel.		
DR104	Please provide the number of referrals and agreements that were accepted for each of the channels reported in DR103.	[Enter value]
DR105	Does your firm offer personalised digital credit comparison tools to consumers?	Yes/No
DR106	Do you demonstrate the goods or service inside the consumer's home?	Yes/No
DR107	Do you provide a quote for goods/services while inside the consumer's home?	Yes/No
DR108	Do sales take place inside the consumer's home?	Yes/No

Reference	Data reporting field	Code (where applicable)
DR109	Are any of your employees involved with the selling of goods and/or services?	Yes/No
DR110	How are your sales employees remunerated?	A - Regular salary B - Salary plus commission C - Commission only
DR111	What is the average percentage split between your sales employees' salaries and commission?	Salary [%] Commission [%]
DR112	What is your firm's sales employee commission model?	A - Variable commission based on value of product B - Fixed commission based on number of sales C - Commission only
DR113	Do your sales employees earn commission on the sale of goods or services?	Yes/No
DR114	Do your sales employees earn commission on finance agreements?	Yes/No

Reporting fields for a firm with permission to carry on the regulated activities of debt adjusting and/or debt counselling

Section 2: 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 regulated activities.		
Reference	Data reporting field	Code (where applicable)
DR201	Our systems show that you have the debt adjusting and/or debt counselling permission(s). Which of the following activities have you undertaken in relation to debts due under a credit agreement or a consumer hire agreement?	<p>A - Negotiating with the lender or owner, on behalf of the borrower or hirer, terms for the discharge of a debt</p> <p>B - Taking over, in return for payments by the borrower or hirer, the borrower or hirer's 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 borrower or hirer about the liquidation of a debt due</p> <p>E - For activities (a) to (d) – hold the permissions solely for the purpose of full or partial settlement of credit agreements in respect of motor vehicles or other goods – eg, part exchange of vehicle</p> <p>F - For activities (a) to (d) – hold the permissions solely for the purpose of providing debt-counselling in connection with mortgage, insurance or investment advice</p> <p>G - None of the above</p>
DR202	For the next reporting period, do you intend to undertake any of the following activities in relation to debts due under a credit agreement or a consumer hire agreement?	<p>A - Negotiating with the lender or owner, on behalf of the borrower or hirer, terms for the discharge of a debt</p> <p>B - Taking over, in return for payments by the borrower or hirer, the borrower or hirer's 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 borrower or hirer about the liquidation of a debt due</p> <p>E - For activities (a) to (d) – hold the permissions solely for the purpose of full or partial settlement of credit agreements in respect of motor vehicles or other goods – eg, part exchange of vehicle</p> <p>F - For activities (a) to (d) – hold the permissions solely for the purpose of providing debt-counselling in connection with mortgage, insurance or investment advice</p> <p>G - None of the above</p>

DR203	Why have you not used your permission?	A - Applied to cancel B - Other reason
DR203a	If you have selected 'B - Other reason', please specify why you have not used your permission	[Free text]
Section 2.1: Debt adjusting and/or debt counselling – business model		
Tell us about your business model.		
Reference	Data reporting field	Code (where applicable)
DR204	Are you a firm that offers money/debt advice and/or provides debt solutions?	A - Money/debt advice only B - Money/debt advice and debt solutions, in which the debt solution is provided by your firm C - Money/debt advice and debt solutions, in which the debt solution is provided by another firm D - Debt advice and debt solutions, in which the debt solution is provided by your firm or by another firm (ie, a combination of (b) and (c)) E - None of the above
Section 2.2: 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 consumers.		
Reference	Data reporting field	Code (where applicable)
DR205	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 - Other

DR206	Are consumers charged a fee for money/debt advice that your firm offers?	Yes/No
DR207	Do you charge a standalone fee for money/debt advice?	Yes/No
DR208	Do you charge a subscription fee for money/debt advice?	Yes/No
DR209	Total revenue of fees and commission per money/debt advice type as reported in DR205	[Enter value]
Section 2.3: Debt adjusting and/or debt counselling – debt advice/solutions		
Tell us about the debt solutions you provide.		
Reference	Data reporting field	Code (where applicable)
DR210	Total number of consumers	[Enter value]
DR211	Total number of consumers who received money/debt advice and did not take up a debt solution	[Enter value]
DR212	Total number of consumers who received money/debt advice and took up a debt solution	[Enter value]

DR213	Total number of consumers who received money/debt advice and were not offered a debt solution	[Enter value]
DR214	Total number of consumers who received money/debt advice and were referred to a debt solution that was offered by another firm	[Enter value]
DR215	What are the different types of debt solutions that your firm offers?	A - Debt management plans B - Individual voluntary arrangements (IVAs) C - Bankruptcy 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
DR216	Total revenue of fees or commission per solution type as reported in DR215	[Enter value]
DR217	Total number of debt solutions per solution type as reported in DR215	[Enter value]

DR218	Total number of debt management plans broken within 6 months of entering into a debt solution	[Enter value]
DR219	Total number of debt management plans broken between 6 and 12 months after entering into a debt solution	[Enter value]
Section 2.4: Debt adjusting and/or debt counselling – charity and not-for-profit-body		
Tell us if you are a charity or not-for-profit body.		
Reference	Data reporting field	Code (where applicable)
DR220	Are you a charity or not-for-profit body?	Yes/No
Section 2.5: Debt adjusting and/or debt counselling – funding source		
Tell us about your funding source.		
Reference	Data reporting field	Code (where applicable)
DR221	Where do you receive funding from?	A - Government department B - Government sponsored body – eg, Money and Pensions Service C - Private companies (including donations) D - Fair-share contributions E - General public donations F - Other charities and/or non-profits G - Internal revenue generation – eg, merchandise sales, referral fee

		H - Network - funding received as part of a debt advice network I - Other
DR222	What is the amount of funding received per source as reported in DR221?	[Enter value]
Section 2.6: Debt adjusting and/or debt counselling – network and operations		
Tell us about your network and operations.		
Reference	Data reporting field	Code (where applicable)
DR223	Are you part of a network?	A - Citizens Advice B - Community Money Advice C - Advice UK D - Law centre E - Other F - Not part of any network
Section 2.7: Debt adjusting and/or debt counselling – consumers		
Tell us about how you engage with consumers.		
Reference	Data reporting field	Code (where applicable)
DR224	How do you engage with your consumers?	A - Website B - Live chat C - Chatbot D - E-mail E - Instant messaging (eg, WhatsApp) F - Video conferencing or chat G - Telephone H - SMS

		I - Your own physical premises J - Consumer's home or dwelling K - Other non-trade premises
Section 2.7.1 Debt adjusting and/or debt counselling – contact centre demand		
Tell us about your contact centre. Certain questions will only apply if your firm has a contact centre.		
Reference	Data reporting field	Code (where applicable)
DR225	Do you have a contact centre?	Yes/No
DR226	How many inbound calls are received?	[Enter value]
DR227	How many inbound calls are dropped?	[Enter value]
DR228	How many inbound calls are answered?	[Enter value]
DR229	What is the total wait time for inbound calls?	[Enter value]
DR230	What is the average call waiting time?	[Enter value]
Section 2.7.2: Debt adjusting and/or debt counselling – web chat		
Tell us about your web chat functionality. Certain questions will only apply if your firm has a web chat functionality.		
Reference	Data reporting field	Code (where applicable)

DR231	Do you have a web chat functionality?	Yes/No
DR232	Number of web chat enquiries	[Enter value]
DR233	Number of web chat enquiries that went on to involve a human agent	[Enter value]
DR234	Number of web chat enquiries that have led to a resolution, without speaking to a human agent	[Enter value]
DR235	Number of web chat enquiries that have been abandoned	[Enter value]
Section 2.8: Debt adjusting and/or debt counselling – referrals		
Tell us about your referrals.		
Reference	Data reporting field	Code (where applicable)
DR236	How are consumers referred to your firm?	A - Government body B - Local council C - Credit card provider D - Utility provider E - Regulated financial firms F - Internal referral from another firm in same group structure G - Other

DR237	Total referrals per firm type as reported in DR236	[Enter value]
Section 2.9: Debt adjusting and/or debt counselling – employees		
Tell us about your employees. Certain questions will only apply if your employees earn a commission.		
Reference	Data reporting field	Code (where applicable)
DR238	Do you have consumer-facing advisors?	Yes/No
DR239	How many consumer-facing advisors do you employ?	[Enter value]
DR240	How are your consumer facing advisor remunerated?	A - Regular salary B - Salary plus commission C - Commission only
DR241	What is the average percentage split between your consumer-facing advisors' salaries and commission?'	Salary [%] Commission [%]
DR242	Do your consumer-facing advisors earn commission when a consumer enters a debt solution?	Yes/No
Section 2.10: Debt adjusting and/or debt counselling – prudential		
Tell us about your prudential information.		

Reference	Data reporting field	Code (where applicable)
DR243	Total value of relevant debts under management that are outstanding	[Enter value]
DR244	Total prudential resources requirement	[Enter value]
DR245	Total prudential resources	[Enter value]
Section 2.11: Debt adjusting and/or debt counselling – client money Tell us about your firm’s regulated activity in relation to client money.		
Reference	Data reporting field	Code (where applicable)
DR246	Select the option which describes your firm’s regulated activity in relation to client money.	A - The reporting firm’s activity in relation to client money is for debt management activity only. B - The reporting firm’s activity in relation to client money includes, but is not limited to, debt management activity. C - The reporting firm’s activity in relation to client money does not include debt management activity. D - The reporting firm does not carry out any regulated activity in relation to client money. E - The reporting firm is unable to determine whether it carries out any regulated activity in relation to client money.
DR247	What was the balance of client money held as at the reporting period end?	[Enter value]

DR248	What was the highest total amount of client money held during the reporting period?	[Enter value]
DR249	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]
DR250	What is your 'CASS debt management firm type' classification?	A - CASS large debt management firm B - CASS small debt management firm
DR251	What was the highest number of clients for whom client money was held at any one time during the reporting period?	[Enter value]
DR252	What was the balance of unallocated client money held as at the reporting period end which has remained unallocated for a period of 6 business days or more?	A - 6-29 days [Enter value] B - 30-59 days [Enter value] C - 60-90 days [Enter value] D - 90+ days [Enter value]

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

Section 3: Providing credit information services – permissions

Tell us about your permissions.		
Reference	Data reporting field	Code (where applicable)
DR301	Our systems show that you have permission for providing credit information services. Which of the following activities have you undertaken?	<p>A - Checking whether a credit information agency holds information on behalf of an individual</p> <p>B - Considering the content of the information about an individual from a credit information agency</p> <p>C - Taking steps leading to the modification of information about an individual that a credit information agency holds</p> <p>D - Taking steps leading to the restriction of access to all information about an individual from a credit information agency</p> <p>E - Giving advice to an individual about any of the above</p> <p>F - None of the above</p>
DR302	For the next reporting period, do you intend to undertake any of the following activities?	<p>A - Checking whether a credit information agency holds information on behalf of an individual</p> <p>B - Considering the content of the information about an individual from a credit information agency</p> <p>C - Taking steps leading to the modification of information about an individual that a credit information agency holds</p> <p>D - Taking steps leading to the restriction of access to all information about an individual from a credit information agency</p> <p>E - Giving advice to an individual about any of the above</p> <p>F - None of the above</p>
DR303	Why have you not used your permission?	<p>A - Applied to cancel</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 - Other reason</p>
DR303a	If you have selected 'E - Other reason', please	[Free text]

	specify why you have not used your permission	
DR304	In the past 12 months, where have you got credit information from?	A - Equifax B - Experian C - TransUnion D - Other CRA not listed above E - Lenders F - Other credit information agency G - Open Banking data
Section 3.1: Providing credit information services – fee model		
Reference	Data reporting field	Code (where applicable)
DR305	Do you charge a fee for getting credit information on behalf of a consumer?	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 3.1.1: Providing credit information services – standalone fees		
Tell us about the standalone fees you charge for getting credit information on behalf of a consumer.		
Reference	Data reporting field	Code (where applicable)
DR306	Fee charged per consumer	[Enter value]
DR307	Total number of consumers charged a fee	[Enter value]
DR308	Total revenue from fees	[Enter value]
Section 3.1.2: Providing credit information services – subscription fee model		

Tell us about the subscription fees you charge for getting credit information on behalf of a consumer.		
Reference	Data reporting field	Code (where applicable)
DR309	What subscription terms do you offer?	A - Weekly B - Monthly C - Annually D - Other
DR310	What are the subscription fees for each of the subscription terms as reported in DR309?	[Enter value]
Section 3.2: Providing credit information services – subscriptions		
Tell us about your consumers and their interaction with your subscription models.		
Reference	Data reporting field	Code (where applicable)
DR311	How many consumers signed up to a subscription?	[Enter value]
DR312	How many consumers have cancelled a subscription?	[Enter value]
DR313	What is the total revenue made from subscriptions?	[Enter value]
DR314	What is the average duration of a subscription before it is cancelled?	[Enter value]

Section 3.2.1: Providing credit information services – subscription cancellations		
Tell us about your subscription cancellations.		
Reference	Data reporting field	Code (where applicable)
DR315	Are consumers able to cancel their subscription term early?	Yes/No
DR316	Do you charge a cancellation fee?	Yes/No
DR317	How much is the cancellation fee?	[Enter value]
Section 3.3: Providing credit information services – business model		
Tell us about your business model.		
Reference	Data reporting field	Code (where applicable)
DR318	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
DR319	Do you collect the information in order to undertake regulated debt advice (eg, as part of offering debt counselling	Yes/No

	and/or debt adjusting services)?	
Section 3.4: Providing credit information services – credit score		
Please provide us with information in relation to your services and credit scores.		
Reference	Data reporting field	Code (where applicable)
DR320	Do you collect the information to give general advice on how a consumer should improve their credit score (eg, sign up to the electoral roll)?	Yes/No
DR321	Do you collect the information to tailor the advice on how a consumer should improve their credit score?	Yes/No
DR322	In your marketing, do you advertise that you can improve a consumer's credit score?	Yes/No
DR322a	What is the total number of consumers you track credit scores for?	[Enter value]
DR322b	Of the consumers you track credit scores for, how many	[Enter value]

	consumers have had an improved score after using your services?	
Section 3.5: Providing credit information services – tailoring advice		
Tell us about how you tailor your advice.		
Reference	Data reporting field	Code (where applicable)
DR323	Do you tailor the advice per consumer?	Yes/No
DR324	Do you tailor the advice based on credit score?	Yes/No
DR325	Do you utilise the credit information to provide tailored introductions to lenders (eg, to offer price comparison services or other credit broking activities)?	Yes/No
DR326	Do you tailor the list of lenders/credit brokers based on credit score?	Yes/No
DR327	Do you rank credit facilities in order of lenders that provide the highest value commissions?	Yes/No

DR328	What is the total number of consumers who have gone on to take out credit based on a referral via your firm?	[Enter value]
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Reporting fields for a relevant ancillary credit firm		
Section 4: Relevant ancillary credit firm – marketing		
Tell us about your firm’s marketing.		
Reference	Data reporting field	Code (where applicable)
DR401	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 H - None of the above
DR402	What is your firm’s marketing spend on the channels as reported in DR401?	[Enter value]
Section 4.1: Relevant ancillary credit firm – employees		
Tell us about your firm’s employees.		
Reference	Data reporting field	Code (where applicable)

DR403	Employees in the firm at time of return	[Enter value]
DR404	Permanent employees at time of return	[Enter value]
DR405	Non-permanent employees at time of return	[Enter value]
DR406	Employees who have joined during the relevant reporting period	[Enter value]
DR407	Employees who have left during the relevant reporting period	[Enter value]
Section 4.2: Relevant ancillary credit firm – compliance		
Tell us about your firm’s employees from a compliance perspective.		
Reference	Data reporting field	Code (where applicable)
DR408	Does your firm have a dedicated compliance function?	A - Permanent compliance team or department B - Permanent full-time compliance officer C - Full-time third party or consultant D - Part-time third party or consultant E - No individual who specialises in compliance
DR409	How many employees make up your firm’s compliance team or department?	[Enter value]

DR410	Is your firm's compliance provided by a lender or broker?	Yes/No
DR411	Who fills out this regulatory return for your firm?	A - Permanent employee B - Third party
Section 4.3: Relevant ancillary credit firm – revenues		
Tell us about your firm's revenues.		
DR412	Total revenue from relevant ancillary credit firm's credit-related regulated activities	[Enter value]
DR413	Total revenue from your firm's business activities (£)	[Enter value]
Section 4.4: Relevant ancillary credit firm – miscellaneous		
Tell us about the following.		
Reference	Data reporting field	Code (where applicable)
DR414	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 38D **Notes for completion of data item relating to relevant ancillary credit firms**

G This is the annex referred to in *SUP* 16.12.29CR. It can be found through the following address:

[*Editor's note*: insert link to form]

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 items* 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*, including to help the *FCA* to monitor *firms*' financial soundness.
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.
7. A *firm* need not complete this return if the only *credit-related regulated activity* it carries on is advising on *regulated credit agreements* for the acquisition of land. Data should be excluded from this return to the extent that they relate to *credit agreements* secured by a *legal or equitable mortgage on land*.

Currency

8. Unless otherwise stated, *firms* should report in sterling.

9. 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.
10. Where you are reporting any monetary values, calculations or percentages, unless otherwise stated, figures should be reported to 2 decimal places.
11. Where you report any non-monetary values, unless otherwise stated, figures should be reported as a whole number.

General reporting guidelines

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

CCR009 – Data item relating to relevant ancillary credit firms

14. This *data item* enables the *FCA* to better capture and understand how *firms* and their markets operate in the *consumer credit* industries.
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.

Guide for the completion of individual fields

Reporting Fields for a firm with permission to carry on the regulated activity of credit broking		
Section 1: Credit broking – permissions		
Reference	Data reporting field	Notes
DR001	Our systems show that you have the credit broking permission. Which of the following activities have you undertaken?	Select all that apply. Please see <i>PERG 2.7.7EG</i> for details of the activities that fall within <i>credit broking</i> . If the activities you indicate relate only to <i>mortgage</i> products and not any other <i>credit</i> finance, you will not need to complete the rest of this return.
DR002	For the next reporting period, do you intend to undertake any of the following activities?	Select all that apply.
DR003	Why have you not used your permission?	Select 1 option only.
DR003a	If you have selected ‘E - Other reason’, please specify why you have not used your permission	N/A
DR004	Do you engage in a credit broking activity in respect of any of the following financial products to consumers?	Select all that apply.
Section 1.1: Credit broking – financial products (apart from finance for goods and services)		

Reference	Data reporting field	Notes
DR005	Total number of credit agreements	<p>These will be agreements where a <i>consumer</i> has successfully taken up a <i>credit agreement</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity.</p> <p>Jointly owned products should be recorded as a single agreement. For example, an agreement entered into jointly by 2 individuals should be recorded as 1.</p>
DR006	Total value of credit agreements (£)	The total amount including interest of all <i>credit agreements</i> entered into by a <i>consumer</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity.
DR007	Maximum value of finance entered into (£)	Please provide the highest amount of <i>credit</i> provided to a <i>consumer</i> in respect of an agreement entered into by a <i>consumer</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity.
DR008	Minimum value of finance entered into (£)	Please provide the lowest amount of <i>credit</i> provided to a <i>consumer</i> in respect of an agreement entered into by a <i>consumer</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity.
DR009	Average value of finance entered into (£)	Please calculate this by dividing the total value in respect of <i>credit agreements</i> entered into by a <i>consumer</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity by the total number of those agreements.
DR010	Maximum APR (%)	The highest <i>APR</i> under a <i>credit agreement</i> entered into by a <i>consumer</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity.
DR011	Minimum APR (%)	The lowest <i>APR</i> under a <i>credit agreement</i> entered into by a <i>consumer</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity.
DR012	Average APR (%)	<p>The average <i>APR</i> under a <i>credit agreement</i> entered into by a <i>consumer</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity.</p> <p>This is calculated by determining the total <i>APR</i> value for <i>credit agreements</i> and dividing that value by the total number of <i>credit agreements</i>.</p>

		<p>By way of illustration, a <i>firm</i> has the following <i>credit agreements</i>:</p> <ul style="list-style-type: none"> • 4X with 30% <i>APR</i>; • 3X with 40% <i>APR</i>; • 2X with 50% <i>APR</i>; and • 1X with 75% <i>APR</i>. <p>The average <i>APR</i> is 41.5%, calculated as follows: $((4 \times 30) + (3 \times 40) + (2 \times 50) + (1 \times 75)) / 10$</p>
DR013	Maximum term of agreement (months)	<p>The longest contractual length of an agreement in <i>months</i> of an individual <i>credit agreement</i> entered into by a <i>consumer</i> following your <i>firm</i>'s engagement in a <i>credit broking</i> activity.</p> <p>Please do not report on agreements which relate to <i>running-account credit</i>.</p>
DR014	Minimum term of agreement (months)	<p>The shortest contractual length of an agreement in <i>months</i> of an individual <i>credit agreement</i> entered into by a <i>consumer</i> following your <i>firm</i>'s engagement in a <i>credit broking</i> activity.</p> <p>Please do not report on agreements which relate to <i>running-account credit</i>.</p>
DR015	Average term of agreement (months)	<p>The average contractual length of agreement in <i>months</i> of all <i>credit agreements</i> entered into by a <i>consumer</i> following your <i>firm</i>'s engagement in a <i>credit broking</i> activity.</p> <p>Please do not report on agreements which relate to <i>running-account credit</i>.</p> <p>By way of illustration, a <i>firm</i> has the following <i>credit agreements</i>:</p> <ul style="list-style-type: none"> • 4X for 38 <i>months</i>; • 3X for 24 <i>months</i>; • 2X for 18 <i>months</i>; and • 1X for 12 <i>months</i>. <p>The average term of agreement is calculated as follows: $((4 \times 38) + (3 \times 24) + (2 \times 18) + (1 \times 12)) / 10$</p>

Section 1.2: Credit broking – goods and services		
Reference	Data reporting field	Notes
DR016	Which of the following goods and services relates to your firm's engagement in a credit broking activity?	Select all that apply
DR017	Does your firm supply any of the following goods to consumers?	Select all that apply
DR018	Does your firm supply any of the following services to consumers?	Select all that apply
Section 1.2.1: Credit broking – motor vehicles		
Reference	Data reporting field	Notes
DR019	Which of the following types of vehicles are sold under an agreement in respect of which your firm engaged in a credit broking activity?	Select all that apply
DR020	What is the condition of vehicles sold under an agreement in respect of which your firm engaged in a credit broking activity?	Select all that apply

DR021	Which types of finance are available on the vehicles you sell on finance?	Select all that apply
Section 1.2.2: Credit broking – financial products (motor vehicles)		
Reference	Data reporting field	Notes
DR022	Total number of credit agreements	Please respond in respect of <i>credit agreements</i> entered into by <i>consumers</i> in relation to a purchase of a vehicle following your <i>firm's</i> engagement in a <i>credit broking</i> activity in relation to those <i>consumers</i> .
DR023	Total value of credit agreements	The total amount including interest (excluding <i>deposit</i> or any part-exchange settlement) of all <i>credit agreements</i> entered into by <i>consumers</i> in relation to a purchase of a vehicle following your <i>firm's</i> engagement in a <i>credit broking</i> activity in relation to those <i>consumers</i> .
DR024	Maximum value of vehicle on finance (£)	The highest value of any individual vehicle sold or leased on finance (excluding <i>deposit</i> or any part-exchange settlement).
DR025	Minimum value of vehicle on finance (£)	The lowest value of any individual vehicle sold or leased on finance (excluding <i>deposit</i> or any part-exchange settlement).
DR026	Average value of vehicle on finance (£)	The average value of all vehicles sold or leased on finance (excluding <i>deposit</i> or any part-exchange settlement). Please calculate this by dividing the total value in respect of <i>credit agreements</i> entered into by a <i>consumer</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity by the total number of those agreements.
DR027	Maximum APR (%)	The highest <i>APR</i> under a <i>credit agreement</i> entered into by a <i>consumer</i> in relation to an individual vehicle obtained on finance, following your <i>firm's</i> engagement in a <i>credit broking</i> activity in relation to that <i>consumer</i> .

DR028	Minimum APR (%)	The lowest <i>APR</i> under a <i>credit agreement</i> entered into by a <i>consumer</i> in relation to an individual vehicle obtained on finance, following your <i>firm's</i> engagement in a <i>credit broking</i> activity in relation to that <i>consumer</i> .
DR029	Average APR (%)	<p>The average <i>APR</i> under a <i>credit agreement</i> entered into by a <i>consumer</i> in relation to an individual vehicle obtained on finance, following your <i>firm's</i> engagement in a <i>credit broking</i> activity in relation to that <i>consumer</i>.</p> <p>By way of illustration, a <i>firm</i> has the following <i>credit agreements</i>:</p> <ul style="list-style-type: none"> • 4X with 30% <i>APR</i>; • 3X with 40% <i>APR</i>; • 2X with 50% <i>APR</i>; and • 1X with 75% <i>APR</i>. <p>The average <i>APR</i> is calculated as follows: $((4 \times 30) + (3 \times 40) + (2 \times 50) + (1 \times 75)) / 10$</p>
DR030	Maximum term of agreement (months)	The longest contractual length of an individual <i>credit agreement</i> entered into by a <i>consumer</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity in relation to that <i>consumer</i> . Please provide your answer in <i>months</i> .
DR031	Minimum term of agreement (months)	The shortest contractual length of an individual <i>credit agreement</i> entered into by a <i>consumer</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity in relation to that <i>consumer</i> . Please provide your answer in <i>months</i> .
DR032	Average term of agreement (months)	<p>The average contractual length of all individual <i>credit agreements</i> entered into by a <i>consumer</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity in relation to that <i>consumer</i>. Please provide your answer in <i>months</i>.</p> <p>By way of illustration, a <i>firm</i> has the following <i>credit agreements</i>:</p> <ul style="list-style-type: none"> • 4X for 38 <i>months</i>; • 3X for 24 <i>months</i>;

		<ul style="list-style-type: none"> • 2X for 18 months; and • 1X for 12 months. <p>The average term of agreement is calculated as follows: $(4 \times 38) + (3 \times 24) + (2 \times 18) + (1 \times 12) / 10$</p>
Section 1.2.3: Credit broking – motor vehicles on consumer hire		
Reference	Data reporting field	Notes
DR033	Total number of hire agreements	Please respond in respect of <i>consumer hire agreements</i> entered into by <i>consumers</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity in relation to those <i>consumers</i> .
DR034	Total value of hire agreements	The total amount including interest (excluding <i>deposit</i> or any part-exchange settlement) of all <i>consumer hire agreements</i> entered into by <i>consumers</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity in relation to those <i>consumers</i> .
DR035	Maximum value of vehicle on finance (£)	The highest value of any individual vehicle sold or leased on finance (excluding <i>deposit</i> or any part-exchange settlement).
DR036	Minimum value of vehicle on finance (£)	The lowest value of any individual vehicle sold or leased on finance (excluding <i>deposit</i> or any part-exchange settlement).
DR037	Average value of vehicle on finance (£)	The average value of all vehicles sold or leased on finance (excluding <i>deposit</i> or any part-exchange settlement). Please calculate this by dividing the total value in respect of <i>consumer hire agreements</i> entered into by a <i>consumer</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity by the total number of those agreements.
DR038	Maximum term of agreement (months)	The longest contractual length of an individual <i>consumer hire agreement</i> entered into by a <i>consumer</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity in relation to that <i>consumer</i> . Please provide your answer in <i>months</i> .

DR039	Minimum term of agreement (months)	The shortest contractual length of an individual <i>consumer hire agreement</i> entered into by a <i>consumer</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity in relation to that <i>consumer</i> . Please provide your answer in <i>months</i> .
DR040	Average term of agreement (months)	<p>The average contractual length of all individual <i>consumer hire agreements</i> entered into by a <i>consumer</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity in relation to that <i>consumer</i>. Please provide your answer in <i>months</i>.</p> <p>By way of illustration, a <i>firm</i> has the following <i>credit agreements</i>:</p> <ul style="list-style-type: none"> • 4X for 38 <i>months</i>; • 3X for 24 <i>months</i>; • 2X for 18 <i>months</i>; and • 1X for 12 <i>months</i>. <p>The average term of agreement is calculated as follows: $((4 \times 38) + (3 \times 24) + (2 \times 18) + (1 \times 12)) / 10$</p>
Section 1.3: Credit broking – settlements		
Reference	Data reporting field	Notes
DR041	Total number of settlements made involving a part-exchange of a vehicle on finance	A settlement is each occasion where money is paid to reduce the outstanding amount under the loan until it is repaid in full (including any applicable fees and interest).
DR042	Total value of all settlements made involving a part-exchange of a vehicle on finance	As above.
DR043	Average value of a settlement made involving a part-exchange of a vehicle on finance	The average value of all settlements made involving the part-exchange of a vehicle on finance.

		<p>A settlement is each occasion where money is paid to reduce the outstanding amount under the loan until it is repaid in full (including any applicable fees and interest).</p> <p>Please calculate this by dividing the total value of all settlements made involving a part-exchange of a vehicle on finance by the total number of settlements made involving a part-exchange of a vehicle on finance.</p>
Section 1.4: Credit broking – goods and services (general)		
Reference	Data reporting field	Notes
DR044	What finance is available on the goods and services you sell?	Select all that apply.
Section 1.4.1: Credit broking – credit agreements (non-motor related goods and services)		
Reference	Data reporting field	Notes
DR045	Total number of credit agreements	Please respond in respect of <i>credit agreements</i> entered into by a <i>consumer</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity in relation to those <i>consumers</i> .
DR046	Total value of credit agreements	The total amount including interest (excluding <i>deposit</i> or any part-exchange settlement) of all <i>credit agreements</i> entered into by <i>consumers</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity in relation to those <i>consumers</i> .
DR047	Maximum value of finance entered into (£)	Please provide the highest amount of <i>credit</i> (excluding <i>deposit</i> or any part-exchange settlement) provided to a <i>consumer</i> in respect of an agreement in respect of an individual good or service, sold or leased on finance to that <i>consumer</i> , which was entered into by a <i>consumer</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity, in relation to that <i>consumer</i> .
DR048	Minimum value of finance entered into (£)	Please provide the lowest amount of <i>credit</i> (excluding <i>deposit</i> or any part-exchange settlement) provided to a <i>consumer</i> in respect of an agreement entered into by a <i>consumer</i> following your

		<i>firm's</i> engagement in a <i>credit broking</i> activity, in relation to an individual good or service, sold or leased on finance to that <i>consumer</i> .
DR049	Average value of finance entered into (£)	<p>Please provide the average amount of <i>credit</i> (excluding <i>deposit</i> or any part-exchange settlement) provided to a <i>consumer</i> in respect of an agreement entered into by a <i>consumer</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity, in relation to all goods or services, sold or leased on finance.</p> <p>Please calculate this by dividing the total value in respect of <i>credit agreements</i> entered into by a <i>consumer</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity by the total number of those agreements.</p>
DR050	Maximum APR (%)	The highest <i>APR</i> under a <i>credit agreement</i> in respect of an individual good or service obtained on finance, which was entered into by a <i>consumer</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity in relation to that <i>consumer</i> .
DR051	Minimum APR (%)	The lowest <i>APR</i> under a <i>credit agreement</i> in respect of an individual good or service obtained on finance, which was entered into by a <i>consumer</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity in relation to that <i>consumer</i> .
DR052	Average APR (%)	<p>The average <i>APR</i> under a <i>credit agreement</i> in respect of goods or services obtained on finance, which was entered into by a <i>consumer</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity in relation to that <i>consumer</i>.</p> <p>By way of illustration, a <i>firm</i> has the following <i>credit agreements</i>:</p> <ul style="list-style-type: none"> • 4X with 30% <i>APR</i>; • 3X with 40% <i>APR</i>; • 2X with 50% <i>APR</i>; and • 1X with 75% <i>APR</i>. <p>The average <i>APR</i> is calculated as follows:</p> $((4 \times 30) + (3 \times 40) + (2 \times 50) + (1 \times 75)) / 10$

DR053	Maximum term of agreement (months)	The longest contractual length of an individual <i>credit agreement</i> entered into by a <i>consumer</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity in relation to that <i>consumer</i> . Please provide your answer in <i>months</i> .
DR054	Minimum term of agreement (months)	The shortest contractual length of an individual <i>credit agreement</i> entered into by a <i>consumer</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity. Please provide your answer in <i>months</i> .
DR055	Average term of agreement (months)	<p>The average contractual length of an individual <i>credit agreement</i> entered into by a <i>consumer</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity. Please provide your answer in <i>months</i>.</p> <p>By way of illustration, a <i>firm</i> has the following <i>credit agreements</i>:</p> <ul style="list-style-type: none"> • 4X for 38 <i>months</i>; • 3X for 24 <i>months</i>; • 2X for 18 <i>months</i>; and • 1X for 12 <i>months</i>. <p>The average term of agreement is calculated as follows: $((4 \times 38) + (3 \times 24) + (2 \times 18) + (1 \times 12)) / 10$</p>
Section 1.4.2: Credit broking – consumer hire agreements (non-motor related products and services)		
Reference	Data reporting field	Notes
DR056	Total number of hire agreements	Please respond in respect of <i>consumer hire agreements</i> entered into by a <i>consumer</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity in relation to those <i>consumers</i> .
DR057	Total value of hire agreements	The total amount including interest (excluding <i>deposit</i> or any part-exchange settlement) of all <i>consumer hire agreements</i> entered into by <i>consumers</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity in relation to those <i>consumers</i> .

DR058	Maximum value of vehicle on finance (£)	Please provide the highest amount of <i>credit</i> (excluding <i>deposit</i> or any part-exchange settlement) provided to a <i>consumer</i> in respect of an agreement in respect of an individual good or service, sold or leased on finance to that <i>consumer</i> , which was entered into by a <i>consumer</i> following your <i>firm</i> 's engagement in a <i>credit broking</i> activity, in relation to that <i>consumer</i> .
DR059	Minimum value of vehicle on finance (£)	Please provide the lowest amount of <i>credit</i> (excluding <i>deposit</i> or any part-exchange settlement) provided to a <i>consumer</i> in respect of an agreement entered into by a <i>consumer</i> following your <i>firm</i> 's engagement in a <i>credit broking</i> activity, in relation to an individual good or service, sold or leased on finance to that <i>consumer</i> .
DR060	Average value of vehicle on finance (£)	<p>Please provide the amount of the average amount of <i>credit</i> (excluding <i>deposit</i> or any part-exchange settlement) provided to a <i>consumer</i> in respect of an agreement entered into by a <i>consumer</i> following your <i>firm</i>'s engagement in a <i>credit broking</i> activity, in relation to all goods or services, sold or leased on finance.</p> <p>Please calculate this by dividing the total value in respect of <i>consumer hire agreements</i> entered into by a <i>consumer</i> following your <i>firm</i>'s engagement in a <i>credit broking</i> activity by the total number of those agreements.</p>
DR061	Maximum term of agreement (months)	The longest contractual length of an individual <i>consumer hire agreement</i> entered into by a <i>consumer</i> following your <i>firm</i> 's engagement in a <i>credit broking</i> activity in relation to that <i>consumer</i> . Please provide your answer in <i>months</i> .
DR062	Minimum term of agreement (months)	The shortest contractual length of an individual <i>consumer hire agreement</i> entered into by a <i>consumer</i> following your <i>firm</i> 's engagement in a <i>credit broking</i> activity in relation to that <i>consumer</i> . Please provide your answer in <i>months</i> .
DR063	Average term of agreement (months)	<p>The average contractual length of all individual <i>consumer hire agreements</i> entered into by a <i>consumer</i> following your <i>firm</i>'s engagement in a <i>credit broking</i> activity in relation to that <i>consumer</i>. Please provide your answer in <i>months</i>.</p> <p>By way of illustration, a <i>firm</i> has the following <i>credit agreements</i>:</p> <ul style="list-style-type: none"> • 4X for 38 <i>months</i>;

		<ul style="list-style-type: none"> • 3X for 24 <i>months</i>; • 2X for 18 <i>months</i>; and • 1X for 12 <i>months</i>. <p>The average term of agreement is calculated as follows: $((4 \times 38) + (3 \times 24) + (2 \times 18) + (1 \times 12)) / 10$</p>
Section 1.5: Credit broking – supplementary		
Reference	Data reporting field	Notes
DR064	What extras or add-ons does your firm sell in support of the main good or service, not included as part of the credit agreement or consumer hire agreement?	Select all that apply.
DR065	What extras or add-ons does your firm sell in support of the main good or service, included as part of the credit agreement and consumer hire agreements?	Select all that apply.
Section 1.6: Credit broking – relationships and commissions between lenders, brokers and owners		
Reference	Data reporting field	Notes
DR066	Who does your firm engage with in relation to your credit broking activities to consumers for the purposes of obtaining credit?	<p>Select all that apply.</p> <p>‘Within the same group’ refers to a company within the same group structure or another branch.</p> <p>‘Unrelated’ means not part of the same corporate group structure.</p>

Section 1.6.1: Credit broking – relationships and commissions between lenders, brokers and owners (introductions)		
Reference	Data reporting field	Notes
DR067	Total credit revenue (£)	Total income received from <i>credit brokers, lenders, owners</i> or vendors for your <i>credit broking</i> activities. This should include commissions, fees from <i>consumers</i> and any other income received.
DR068	Total commission	This is a subtotal of total <i>credit</i> revenue.
DR069	Total fees from consumer	As above.
DR070	Other income received	As above.
DR071	Total successful introductions	Total number of <i>consumers</i> introduced who proceeded to enter into a <i>credit agreement</i> and/or a <i>consumer hire agreement</i> .
DR072	Total declined introductions	Total number of <i>consumers</i> introduced and were denied a <i>credit agreement</i> and/or a <i>consumer hire agreement</i> .
DR073	Total non-successful introductions	Total number of <i>consumers</i> introduced that were offered a <i>credit agreement</i> and/or a <i>consumer hire agreement</i> , but decided not to enter into an agreement.
DR074	Total introductions	Total number of <i>consumers</i> introduced regardless of outcome. Please calculate this by adding the values for total successful introductions, total declined introductions by the <i>lender</i> or <i>owner</i> following an introduction and total non-successful introductions.
Section 1.6.2: Credit broking – relationships and commissions with lenders		
Reference	Data reporting field	Notes

DR075	Name of lender	This can include <i>lenders</i> who are unrelated to your <i>firm</i> or within the same group.
DR076	Firm reference number (if applicable)	N/A
DR077	Total successful introductions	Total number of <i>consumers</i> who proceeded to enter into a <i>credit agreement</i> and/or a <i>consumer hire agreement</i> following your <i>firm</i> 's engagement in a <i>credit broking</i> activity in relation to those <i>consumers</i>
DR078	Total declined introductions	Total number of <i>consumers</i> that were refused a <i>credit agreement</i> and/or a <i>consumer hire agreement</i> following your <i>firm</i> 's engagement in a <i>credit broking</i> activity in relation to those <i>consumers</i>
DR079	Total non-successful introductions	Total number of <i>consumers</i> that were offered a <i>credit agreement</i> and/or a <i>consumer hire agreement</i> , but decided not to enter into an agreement following your <i>firm</i> 's engagement in a <i>credit broking</i> activity in relation to those <i>consumers</i>
DR080	Total introductions	Total number of <i>consumers</i> in respect of whom your <i>firm</i> engaged in a <i>credit broking</i> activity.
DR081	Revenue (£)	Please set out the amount of commission earned by the <i>firm</i> from the <i>lender</i> in respect of the <i>firm</i> 's engagement in <i>credit broking</i> activities.
Section 1.6.3: Credit broking – relationships and commissions with brokers		
Reference	Data reporting field	Notes
DR082	Name of broker	This can include brokers who are unrelated to your <i>firm</i> or within the same group.
DR083	Firm reference number (if applicable)	N/A

DR084	Total successful introductions	Total number of <i>consumers</i> who proceeded to enter into a <i>credit agreement</i> and/or a <i>consumer hire agreement</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity in relation to those <i>consumers</i> .
DR085	Total declined introductions	Total number of <i>consumers</i> that were refused a <i>credit agreement</i> and/or a <i>consumer hire agreement</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity in relation to those <i>consumers</i> .
DR086	Total non-successful introductions	Total number of <i>consumers</i> that were offered a <i>credit agreement</i> and/or a <i>consumer hire agreement</i> , but decided not to enter into an agreement following your <i>firm's</i> engagement in a <i>credit broking</i> activity in relation to those <i>consumers</i> .
DR087	Total introductions	Total number of <i>consumers</i> in respect of whom your <i>firm</i> engaged in a <i>credit broking</i> activity, regardless of outcome.
DR088	Revenue (£)	Please set out the 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.
Section 1.6.4: Credit broking – relationships and commissions with owners		
Reference	Data reporting field	Notes
DR089	Name of owner	This can include <i>owners</i> who are unrelated to your <i>firm</i> or within the same group.
DR090	Firm reference number (if applicable)	N/A
DR091	Total successful introductions	Total number of <i>consumers</i> who proceeded to enter into a <i>credit agreement</i> and/or a <i>consumer hire agreement</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity in relation to those <i>consumers</i> .

DR092	Total declined introductions	Total number of <i>consumers</i> that were refused a <i>credit agreement</i> and/or a <i>consumer hire agreement</i> following your <i>firm's</i> engagement in a <i>credit broking</i> activity in relation to those <i>consumers</i> .
DR093	Total non-successful introductions	Total number of <i>consumers</i> that were offered a <i>credit agreement</i> and/or a <i>consumer hire agreement</i> , but decided not to enter into an agreement following your <i>firm's</i> engagement in a <i>credit broking</i> activity in relation to those <i>consumers</i> .
DR094	Total introductions	Total number of <i>consumers</i> in respect of whom your <i>firm</i> engaged in a <i>credit broking</i> activity, regardless of outcome.
DR095	Revenue (£)	Please set out the 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.
Section 1.7: Credit broking – declines		
Reference	Data reporting field	Notes
DR096	Does your firm introduce consumers that a lender or owner has declined for credit to another broker or lender outside of your standard panel?	For example, to a specialist broker who deals with low <i>credit score consumers</i> .
Section 1.8: Credit broking – firm remuneration		
Reference	Data reporting field	Notes
DR097	How is your firm remunerated for its credit broking activities?	Select all that apply.
Section 1.8.1: Credit broking – revenue per channel		

Reference	Data reporting field	Notes
DR098	Please provide your revenue for each channel as reported in DR097.	Please 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.
DR099	Does your firm proactively notify consumers that you receive commission from the lender or owner?	N/A
DR100	Does your firm proactively tell consumers the value (or percentage) of the commission you receive?	N/A
DR101	Does your firm charge consumers fees for brokering finance?	N/A
DR102	When does your firm charge the consumer fees for brokering finance?	Select all that apply.
Section 1.9: Credit broking – sales channels		
Reference	Data reporting field	Notes
DR103	Which of the following channels have consumers used to purchase your products or services on credit?	Select all that apply. Where a <i>consumer</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 debt set up.

		For cross-channel sales journeys, this should be 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 – accepted referrals and agreements		
Reference	Data reporting field	Notes
DR104	Please provide the number of referrals and agreements that were accepted for each of the channels reported in DR103.	Where a <i>consumer</i> has completed the transaction on that channel – for instance, giving bank details on an online form. For cross-channel sales journeys, this should be where the bulk of the transaction takes place. If your <i>firm</i> does not have oversight of the number of <i>consumers</i> who entered into a <i>credit agreement</i> or <i>consumer hire agreement</i> , please set out the number of referrals made only.
DR105	Does your firm offer personalised digital credit comparison tools to consumers?	For example, showing a <i>consumer</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.
DR106	Do you demonstrate the goods or service inside the consumer’s home?	N/A
DR107	Do you provide a quote for goods/services while inside the consumer’s home?	N/A
DR108	Do sales take place inside the consumer’s home?	A sale has taken place where a <i>consumer</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 debt set up.
Section 1.10: Credit broking – employee remuneration		
Reference	Data reporting field	Notes

DR109	Are any of your employees involved with the selling of goods and/or services?	N/A
DR110	How are your sales employees remunerated?	Select all that apply.
DR111	What is the average percentage split between your consumer-facing advisors' salaries and commission?	Please provide percentage figures for both employee salary and commission.
DR112	What is your firm's sales employee 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.
DR113	Do your sales employees earn commission on the sale of goods or services?	N/A
DR114	Do your sales employees earn commission on finance agreements?	N/A

Reporting fields for a firm with permission to carry on the regulated activities of debt adjusting or debt counselling

Section 2: Debt adjusting and/or debt counselling – permissions		
Reference	Data reporting field	Notes
DR201	Our systems show that you have the debt adjusting and/or debt counselling permission(s). Which of the following activities have you undertaken in relation to debts due under a credit agreement or a consumer hire agreement?	Please 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.
DR202	For the next reporting period, do you intend to undertake any of the following activities in relation to debts due under a credit agreement or a consumer hire agreement?	Please 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.
DR203	Why have you not used your permission?	Select 1 option only.
DR203a	If you have selected ‘B - Other reason’, please specify why you have not used your permission	N/A
Section 2.1: Debt adjusting and/or debt counselling – business model		
Reference	Data reporting field	Notes
DR204	Are you a firm that offers money/debt advice and/or provides debt solutions?	Select all that apply. ‘Money advice’ means general advice on money-related issues such as budgeting, utility bills or council tax.

		<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>consumer</i> to a particular course of action. This includes the activities of <i>debt-adjusting</i> and <i>debt-counselling</i>.</p> <p>‘<i>Debt solution</i>’ means an arrangement, scheme or procedure, whether statutory or not, the aim of which is to discharge or liquidate a <i>consumer’s</i> debts. Should you refer <i>consumers</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>, please select option (c).</p>
Section 2.2: Debt adjusting and/or debt counselling – fees and revenues		
Reference	Data reporting field	Notes
DR205	What are the different types of money/debt advice that your firm offers?	Select all that apply.
DR206	Are consumers charged a fee for money/debt advice that your firm offers?	This should include any administration fee for using your <i>firm’s</i> service for debt advice.
DR207	Do you charge a standalone fee for money/debt advice?	A one-off fee that your <i>firm</i> charges for providing debt advice.
DR208	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> .
DR209	Total revenue of fees and commission per money/debt advice type as reported in DR205	Please provide values in respect of fees or commission received.
Section 2.3: Debt adjusting and/or debt counselling – debt advice/solutions		
Reference	Data reporting field	Notes

DR210	Total number of consumers	<p>Include all <i>consumers</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"> • website; • live chat; • chatbot; • e-mail; • instant messaging (eg, WhatsApp); • video conferencing or chat; • telephone; • SMS; • your own physical premises; • <i>consumer’s</i> home or dwelling; and • other non-trade premises.
DR211	Total number of consumers who received money/debt advice and did not take up a debt solution	When a <i>debt solution</i> (provided by your <i>firm</i>) was presented but the <i>consumer</i> did not proceed with the arrangement, scheme or procedure. This should be a subset of the total number of <i>consumers</i> .
DR212	Total number of consumers who received money/debt advice and took up a debt solution	When a <i>debt solution</i> (provided by your <i>firm</i>) was presented and the <i>consumer</i> proceeded with the arrangement, scheme or procedure. This should be a subset of the total number of <i>consumers</i> .
DR213	Total number of consumers who received money/debt advice and were not offered a debt solution	When after engagement no suitable <i>debt solution</i> was found or needed. This should be a subset of the total number of <i>consumers</i> .
DR214	Total number of consumers who received money/debt advice and were referred to a	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>consumers</i> .

	debt solution that was offered by another firm	
DR215	What are the different types of debt solutions that your firm offers?	Select all that apply.
DR216	Total revenue of fees or commission per solution type as reported in DR215	Please provide values in respect of fees or commission received.
DR217	Total number of debt solutions per solution type as reported in DR215	Please provide values in respect of <i>debt solutions</i> provided.
DR218	Total number of debt management plans broken within 6 months of entering into a debt solution	A <i>debt management plan</i> is broken if 3 consecutive payments are missed, excluding partial payments.
DR219	Total number of debt management plans broken between 6 and 12 months after entering into a debt solution	As above.
Section 2.4: Debt adjusting and/or debt counselling – charity and not-for-profit-body		
Reference	Data reporting field	Notes
DR220	Are you a charity or not-for-profit body?	N/A
Section 2.5: Debt adjusting and/or debt counselling – funding source		
Reference	Data reporting field	Notes
DR221	Where do you receive funding from?	Select all that apply

DR222	What is the amount of funding received per source as reported in DR221?	N/A
Section 2.6: Debt adjusting and/or debt counselling – network and operations		
Reference	Data reporting field	Notes
DR223	Are you part of a network?	Select all that apply
Section 2.7: Debt adjusting and/or debt counselling – consumers		
Reference	Data reporting field	Notes
DR224	How do you engage with your consumers?	Select all that apply. This relates to engagement before, during or after providing either debt advice or a <i>debt solution</i> .
Section 2.7.1: Debt adjusting and/or debt counselling – contact centre demand		
Reference	Data reporting field	Notes
DR225	Do you have a contact centre?	A ‘contact centre’ is a dedicated team/operation for answering phone calls/queries for debt or money advice over the phone.
DR226	How many inbound calls are received?	‘Inbound’ means <i>consumer to firm</i> .
DR227	How many inbound calls are dropped?	‘Dropped’ means that the <i>consumer</i> left the call queue before their call could be answered.
DR228	How many inbound calls are answered?	‘Answered’ means that the call was taken by an employee.

DR229	What is the total wait time for inbound calls?	The ‘total wait time’ is the length of time that the <i>consumer</i> waits to speak with an employee after that initial route. Please set out the length of time in seconds by adding all of the wait times for all of your <i>consumers</i> .
DR230	What is the average call waiting time?	This is calculated by dividing the <i>consumer’s</i> total wait time by the number of calls answered. Please set out the length of time in seconds.
Section 2.7.2: Debt adjusting and/or debt counselling – web chat		
Reference	Data reporting field	Notes
DR231	Do you have a web chat functionality?	Yes/No A web chat functionality refers to a real-time online communication tool that allows users to interact with a chatbot (a computer program that simulates and processes human conversation) or a consumer service representatives in real time through direct messaging
DR232	Number of web chat enquiries	‘Enquiries’ mean that a user started an initial interaction through the communication tool.
DR233	Number of web chat enquiries that went on to involve a human agent	This relates to an interaction which needed further assistance provided by an employee.
DR234	Number of web chat enquiries that have led to a resolution, without speaking to a human agent	This relates to an interaction which was successfully resolved by the chatbot.
DR235	Number of web chat enquiries that have been abandoned	This relates to an interaction which was left unresolved, due to the disconnection of the chat.
Section 2.8: Debt adjusting and/or debt counselling – referrals		

Reference	Data reporting field	Notes
DR236	How are consumers referred to your firm?	Select all that apply. Referred means introduced to your firm by another firm for the purpose of obtaining money/debt advice and/or debt solutions.
DR237	Total referrals per firm type as reported in DR236	Enter total referral numbers for each type of <i>firm</i> .
Section 2.9: Debt adjusting and/or debt counselling – employees		
Reference	Data reporting field	Notes
DR238	Do you have consumer-facing advisors?	N/A
DR239	How many consumer-facing advisors do you employ?	Where you have part-time consumer facing advisors, please calculate this by adding the total hours worked by part-time and full-time consumer 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 consumer facing advisors that work 50% of normal hours, the figure would be 10. Please report to 2 decimal places where the result is not a whole number. For example, if the <i>firm</i> has 15 part time consumer facing advisors that work 50% of normal hours, the figure would be 7.50.
DR240	How are your consumer-facing advisors remunerated?	Select all that apply.
DR241	What is the average percentage split between your consumer-facing advisors' salaries and commission?	Please provide percentage figures for both consumer facing advisors' salary and commission.

DR242	Do your consumer-facing advisors earn commission when a consumer enters a debt solution?	N/A
Section 2.10: Debt adjusting and/or debt counselling – prudential		
Reference	Data reporting field	Notes
DR243	Total value of relevant debts under management that are outstanding	<p><i>Firms</i> should 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.</p> <p>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 re-calculated figure.</p> <p>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.</p>
DR244	Total prudential resources requirement	<p><i>Firms</i> should 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 DR243 (Total value of relevant debts under management 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 DR243 (Total value of relevant debts under management that are outstanding), as the minimum prudential resources requirement in <i>CONC 10</i> is £5,000.</p>
DR245	Total prudential resources	<i>Firms</i> should enter their total prudential resources, calculated in accordance with <i>CONC 10</i> .

Section 2.11: Debt adjusting and/or debt counselling – client money		
Reference	Data reporting field	Notes
DR246	Select the option which describes your firm’s regulated activity in relation to client money.	Select 1 option only. 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 <i>client money</i> , or such a <i>requirement</i> to the same effect. 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.
DR247	What was the balance of client money held as at the reporting period end?	N/A
DR248	What was the highest total amount of client money held during the reporting period?	Please report the highest total amount of <i>client money</i> held during the preceding reporting period. Please record zero amounts as 0.
DR249	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
DR250	What is your ‘CASS debt management firm type’ classification?	Select 1 option only. As described in <i>CASS</i> 11.2.3R.
DR251	What was the highest number of clients 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 <i>client money</i> was held in respect of debt management activity at any one time during the reporting period.

DR252	What was the balance of unallocated client money held as at the reporting period end which has remained unallocated for a period of 6 business days or more?	<p>When entering this data, <i>firms</i> should report the data according to one of 4 specified time bands according to the length of time for which the <i>client money</i> has remained unallocated:</p> <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>. <p>This would align with a similar question on unresolved <i>client money</i> items in the client money and asset return (CMAR) for <i>investment firms</i> (see Q24 in the CMAR (https://www.handbook.fca.org.uk/form/sup/sup_chapter16_annex29R_20150601.pdf)) set out in SUP 16 Annex 29R (Client Money and Asset Return).</p>
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Reporting fields for a firm with permission to carry on the regulated activity of providing credit information services		
Section 3: Providing credit information services – permissions		
Reference	Data reporting field	Notes
DR301	Our systems show that you have permission for providing credit information services. Which of the following activities have you undertaken?	<p>Select all that apply.</p> <p>Please see <i>PERG 2.7.20KG</i> for details of the activities that fall within <i>providing credit information services</i></p> <p>You can select ‘F - None of the above’ if you engage in any of A to E on either:</p> <ul style="list-style-type: none"> • information that your own <i>firm</i> holds on the individual; or • <i>operating an electronic system in relation to lending</i> under Article 36H of the <i>Regulated Activities Order</i>.

DR302	For the next reporting period, do you intend to undertake any of the following activities?	As above.
DR303	Why have you not used your permission?	Select 1 option only. N/A
DR303a	If you have selected 'E - Other reason', please specify why you have not used your permission	N/A
DR304	In the past 12 months, where have you got credit information from?	Select all that apply.
Section 3.1: Providing credit information services – fee model		
Reference	Data reporting field	Notes
DR305	Do you charge a fee for getting credit information on behalf of a consumer?	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 3.1.1: Providing credit information services – standalone fees		
Reference	Data reporting field	Notes
DR306	Fee charged per consumer	The standalone fee that is charged per <i>consumer</i> for obtaining <i>credit information</i> on their behalf.
DR307	Total number of consumers charged a fee	The total number of <i>consumers</i> charged a fee for obtaining <i>credit information</i> .

DR308	Total revenue from fees	The total amount of income received for getting <i>credit information</i> on behalf of a <i>consumer</i> .
Section 3.1.2: Providing credit information services – subscription fee model		
Reference	Data reporting field	Notes
DR309	What subscription terms do you offer?	Select all that apply. A ‘subscription term’ is the inherent commitment length for subscriptions linked to the service you provide.
DR310	What are the subscription fees for each of the subscription terms as reported in DR309?	A ‘subscription fee’ is the fee that is charged per <i>consumer</i> for obtaining <i>credit information</i> on their behalf.
Section 3.2: Providing credit information services – subscriptions		
Reference	Data reporting field	Notes
DR311	How many consumers signed up to a subscription?	N/A
DR312	How many consumers have cancelled a subscription?	N/A
DR313	What is the total revenue made from subscriptions?	The total amount of income received from <i>consumer</i> subscriptions
DR314	What is the average duration of a subscription before it is cancelled?	The average length of time from when a <i>consumer</i> signs up to the subscription service to when they cancel, in respect of agreements cancelled. Please set out your response in <i>days</i> . Do not count those consumers that cancelled within a cooling-off period.

Section 3.2.1: Providing credit information services – subscription cancellations		
Reference	Data reporting field	Notes
DR315	Are consumers able to cancel their subscription term early?	N/A
DR316	Do you charge a cancellation fee?	N/A
DR317	How much is the cancellation fee?	N/A
Section 3.3: Providing credit information services – business model		
Reference	Data reporting field	Notes
DR318	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>consumer</i> . It either explicitly or implicitly steers the <i>consumer</i> to a particular course of action.
DR319	Do you collect the information in order to undertake regulated debt advice (eg, as part of offering debt counselling and/or debt adjusting services)?	N/A
Section 3.4: Providing credit information services – credit score		
Reference	Data reporting field	Notes

DR320	Do you collect the information to give general advice on how a consumer 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>consumer</i> – in this case, general advice on how a <i>consumer</i> should improve their <i>credit</i> score. It either explicitly or implicitly steers the <i>consumer</i> to a particular course of action.
DR321	Do you collect the information to tailor the advice on how a consumer should improve their credit score?	As above.
DR322	In your marketing, do you advertise that you can improve a consumer’s credit score?	N/A.
DR322a	What is the total number of consumers you track credit scores for?	‘Tracking <i>credit</i> ’ means monitoring an individual <i>consumer’s credit</i> score to measure positive or negative change.
DR322b	Of the consumers you track credit scores for, how many consumers have had an improved score after using your services?	‘Improvement’ means a positive change in a <i>consumers’ credit</i> score.
Section 3.5: Providing credit information services – tailoring advice		
Reference	Data reporting field	Notes
DR323	Do you tailor the advice per consumer?	N/A
DR324	Do you tailor the advice based on credit score?	N/A

DR325	Do you utilise the credit information to provide tailored introductions to lenders (eg, to offer price comparison services or other credit broking activities)?	N/A
DR326	Do you tailor the list of lenders/credit brokers based on credit score?	‘Tailoring a list of <i>lenders/credit brokers</i> ’ means presenting a set of <i>lenders/credit brokers</i> to a <i>consumer</i> that are deemed to be appropriate to that <i>consumer</i> based on their <i>credit</i> score.
DR327	Do you rank credit facilities in order of lenders that provide the highest value commissions?	N/A
DR328	What is the total number of consumers who have gone on to take out credit based on a referral via your firm?	N/A

Reporting fields for a relevant ancillary credit firm		
Section 4: Relevant ancillary credit firm – marketing		
Reference	Data reporting field	Notes
DR401	Which of the following channels does your firm use for marketing?	For either financial services, or goods or services you sell on <i>credit</i> . Select all that apply.
DR402	What is your firm’s marketing spend on the channels as reported in DR401?	As above.

Section 4.1: Relevant ancillary credit firm – employees		
Reference	Data reporting field	Notes
DR403	Employees in the firm at time of return	Please refer to the definition of <i>employee</i> in the <i>Handbook Glossary</i> . This could include someone who is under an employment contract with the <i>firm</i> . Where you have part-time <i>employees</i> , please calculate this by adding the total hours worked by part-time and full-time <i>employees</i> 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>employees</i> that work 50% of normal hours, the figure would be 10. Please 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>employees</i> that work 50% of normal hours, the figure would be 7.50.
DR404	Permanent employees at time of return	N/A
DR405	Non-permanent employees at time of return	Non-permanent <i>employees</i> include contractors, temporary staff, freelancers and apprentices.
DR406	Employees who have joined during the relevant reporting period	N/A
DR407	Employees who have left during the relevant reporting period	N/A
Section 4.2: Relevant ancillary credit firm – compliance		
Reference	Data reporting field	Notes
DR408	Does your firm have a dedicated compliance function?	Select only 1 option.

DR409	How many employees make up your firm's compliance team or department?	N/A
DR410	Is your firm's compliance provided by a lender or broker?	N/A
DR411	Who fills out this regulatory return for your firm?	Select permanent <i>employee</i> or third party.
Section 4.3: Relevant ancillary credit firm – revenues		
Reference	Data reporting field	Notes
DR412	Total revenue from relevant ancillary credit firms' credit-related regulated activities	<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>. <p>For example, a <i>firm</i> sells a product for £1,000 after referring the <i>consumer</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 income as £50.</p> <p>£0 can be reported if no income is derived from the <i>permissions</i> that the <i>firm</i> holds. 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 finance companies they refer to, nor do they charge for the referral, they 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 goods in itself is not a <i>regulated activity</i>.</p>

DR413	Total revenue from your firm's business activities (£)	<p>Total amount of revenue received from all of the <i>firm's</i> business activities, both regulated <i>credit broking</i> and unregulated activities.</p> <p>For example, a <i>firm</i> sells a product for £1,000 after referring the customer 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 total revenue as £1,050.</p>
Section 4.4: Relevant ancillary credit firm – miscellaneous		
Reference	Data reporting field	Notes
DR414	Are you a member of a trade body or association that has a code of conduct that you are signed up to?	N/A

