

# CONSUMER CREDIT REGULATORY RETURNS - CREDIT BROKING REPORTING CCR009

FCA PS25/3, 7 MAY 2025

CLIENT GUIDE



# BACKGROUND

As part of its strategy to become a 'more outcomes-based, assertive and data led regulator', the Financial Conduct Authority (FCA) published [PS25/3](#), introducing new reporting requirements for Consumer Credit firms engaged in Credit Broking, Debt Adjusting, Debt Counselling and Credit Information Services, which take effect on 7 May 2025.

FCA introduced Product Sales Data (PSD) reporting for firms with lending (not hire) permissions. Those reporting requirements commence in Q3 2025 and represent a significant shift in the reporting requirements for consumer credit firms.

This has been quickly followed by the introduction of Consumer Credit – Credit Broking, Debt Adjusting, Debt Counselling and Credit Information Services Reporting (CCR009), effective from 7 May 2025. This reporting partially replaces existing aggregated reporting already submitted via CCR002 and CCR007.

PSD and Consumer Credit Regulatory Returns require in-scope firms to provide granular data, with the data points clearly aligned to monitoring of customer outcomes and compliance with associated FCA Handbook Rules and Guidance.

Together, these returns provide the FCA with oversight of the end-to-end customer journey and the outcomes customers experience as they flow through the lifecycle of the credit product.

## **Consumer Credit Regulatory Returns - Credit Broking (CCR009)**

### **A significant proportion of CCR009 focusses on Credit Broking activity – the introduction of a customer to a lending or hire product.**

The return has 5 mandatory sections of questions for all in-scope firms, followed by tailored questions specific to firms' permissions.

The 5 mandatory sections ask for data about a firm's:

- Permissions – the regulated activities firms have undertaken in the past 12 months.
- Business model – the financial products, goods, and/or services firms are providing.
- Marketing – the channels firms use to acquire consumers.
- Revenue – total revenue from credit-related activities and non-credit related activities.
- Staff – the number of employees, and incentive and remuneration arrangements.

The purpose of this Guide is to aid firms holding Credit Broking permissions to:

- Implement the new reporting requirements.
- Understand the implications of the new reporting requirements.
- Consider any remedial activity which may be required.



# TIMELINE TO IMPLEMENTATION



## IMPLEMENTATION – KEY POINTS

- **07 May '25** – Policy Statement published with the rules taking immediate effect
- The first reporting period covers **1 January '25 to 31 December '25**
- Time to submit the data is 40 business days from the end of the reporting period – **February '26**
- **The first submission will be an annual submission for all firms**
- For larger firms who will report 6 monthly, their first half yearly submission will cover **1 January '26 to 30 June '26**
- Firms that do not have sufficient data to report for the first reporting period should calculate an annualised figure based on available actual data

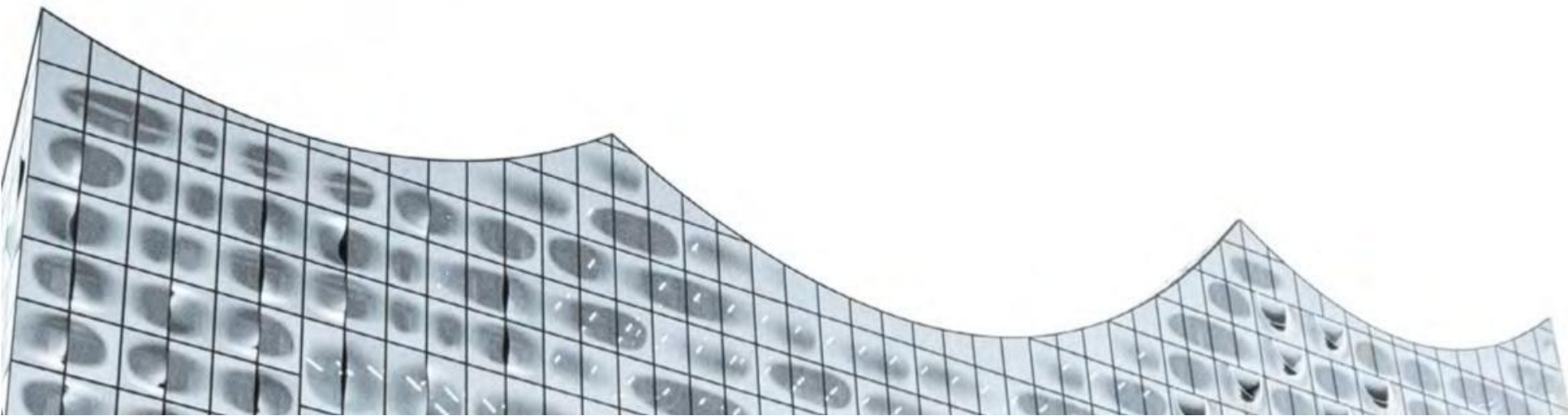


# KEY CONSIDERATIONS

The previous slide demonstrates a demanding timeline to implementation, which risks firms focussing purely on the data gathering aspects of the return and less on the purpose of the return.

It is essential firms allow sufficient time to gather the data, build their reporting capability, test this capability ahead of the submission date and **interrogate their data against the checklist below:**

- **What will this data tell the FCA about your firm?**
- **Are permissions correct given the data - should you have a limitation? Should you have full permission?**
- **Do you have sufficient oversight to provide the data?**
  - Does your Management Information feature the data required in CCR009?
  - Does this feature in your Consumer Duty Board report?
- **What data gaps do you have?**
  - What do these say about how well you know your business?
  - Can you demonstrate appropriate controls?
  - Can you demonstrate oversight is in place and effective?
- **If you are a Principal Firm can you:**
  - Provide consolidated data for your own and your ARs or IARs?
  - Provide split data for both the principal and any ARs or IARs?
  - Ensure that answers provided in CCR009 align with and supports the information provided in REP025, which covers the oversight and monitoring of ARs by Principal firms.



# WHAT'S CHANGING?

## CURRENT APPLICABLE DATA RETURNS



### CCR001

#### CONSUMER CREDIT DATA: FINANCIAL DATA

- Balance Sheet items, including:
  - Current assets and liabilities
  - Income Statement (including regulated business revenue)



### CCR002

#### CONSUMER CREDIT DATA: VOLUMES

- Credit Broking and other credit related activity:
  - Fee Mechanism
  - Revenue
  - Total Customers
  - Total Transactions
- Total annual income



### CCR007

#### LIMITED PERMISSION FIRMS

- Revenue from credit-related regulated activities
- Total revenue (including from activities other than credit-related regulated activities)
- Number of transactions involving credit-related regulated activities in reporting period
- Number of complaints related to credit-related activities received in period
- Type of credit-related regulated activity carried on in relation to the greatest number of customers in reporting period

# KEY POINTS TO NOTE - CCR009



## 01

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CCR009 completely replaces CCR004 - Consumer credit data: Debt management firms) and CCR005 Consumer credit data: Client Money & Assets.

## 04

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Each firm will be required to submit a return on an individual basis even if they are part of a group.

## 07

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Full permission firms with annual revenue from credit-related regulated activities of £5 million or less must complete CCR009 by reference to the annual reporting period beginning on 1 January and ending on 31 December.

## 02

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CCR009 also replaces elements of CCR002. – Consumer credit data: Volumes and CCR007 – Consumer credit data for limited permission credit firms.

## 05

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The FCA will use data from PSD returns to examine agreements, meaning all data must be consistent, whether submitted by the lender or broker.

## 08

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Reporting frequencies and reporting periods will be calculated on a calendar year basis and not by reference to the firm's accounting reference date. The relevant half-years end on the last business day of June and December.

## 03

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Despite the overlap in the data elements, firms will still be required to submit returns under CCR001, CCR002, CCR003, CCR006 and CCR007

## 06

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Full permission firms with annual revenue from credit-related regulated activities of more than £5 million must complete CCR009 twice a year. The reporting frequencies for these returns are calculated from and inclusive of 1 January and 30 June respectively.

# PROPOSED NEW DATA RETURNS CCR009

## MANDATORY QUESTIONS FOR ALL FIRMS

### Mandatory Questions for all firms:

**Permissions** – regarding the regulated activities the firm has undertaken in the past 12 months (or why the firm has not used their permission)

**Business model** – regarding the financial products, goods and/or services that firms are providing to consumers

**Marketing** – regarding the channels firms are using to target consumers

**Revenue** – total revenue from credit-related activities **and** non-credit related activities

**Employees** – details of total number of employees by FTE. Number of sales/advice staff and commission model. Details of training and compliance

# CCR009 - CONSIDERATIONS



Section 1	What to consider
<p><b>Which credit broking activities does the firm undertake?</b></p>	<p>The FCA will expect you to understand the nature of your credit broking activities. For example:</p> <ul style="list-style-type: none"> <li>• Does it involve broking to other credit brokers?</li> <li>• Is it in relation to hire agreements, credit agreements?</li> <li>• Are fees charged for credit broking?</li> <li>• You will also need to inform the FCA if you have not used your credit broking permission in the last 12 months and why.</li> </ul>
<p><b>Why do you hold a credit broking permission?</b></p>	<ul style="list-style-type: none"> <li>• The FCA will expect you to tell them what you hold the credit broking permission for, whether you have applied to the FCA to cancel your authorisation or vary your permission to remove credit broking.</li> </ul>
<p><b>Financial products for which you hold the credit broking permission for</b></p>	<ul style="list-style-type: none"> <li>• The information required is so granular that it requires the firm to set out what type of financial product it brokers (for example cash loans, premium finance, credit cards).</li> </ul>
<p><b>Total number of introductions made by your firm and ARs</b></p>	<ul style="list-style-type: none"> <li>• To provide this information the Principal firm will need to ensure that its systems are able to capture and record this for the Principal and its ARs and IARs (where applicable).</li> <li>• This information must be provided for <u>each type</u> of credit agreement the firm or its AR brokers.</li> </ul>
Section 1.2	What to consider
<p><b>Goods and Services brokered</b></p> <ul style="list-style-type: none"> <li>• The FCA will expect firms to detail not only the types of goods and services that the credit broking relates to but also the types of goods and services supplied to customers under credit agreement.</li> <li>• Types of finance brokered - both hire and credit.</li> <li>• Number of introductions made by the firm and its ARs (where applicable) broken down by hire and credit agreements.</li> </ul>	<ul style="list-style-type: none"> <li>• Do you have a record of the types of goods and services that you broker finance for?</li> <li>• How is this information recorded?</li> <li>• Will this match with the lenders' records/loan agreements when reported via PSD returns?</li> <li>• Do the goods financed suggest your target market has a higher propensity to include vulnerable customers? E.g., – mobility aids, health care and medical, etc.</li> </ul>



# CCR009 - CONSIDERATIONS



Section 1.3.1	What to consider
<p><b>Where the broking relates to motor vehicles, the FCA requires specific information on:</b></p> <ul style="list-style-type: none"> <li>• The types of motor vehicles including whether they are new or used.</li> <li>• The nature of the finance (for example HP, PCP, PCH, Conditional Sale etc.) - brokers might need to rely on lenders to provide this detail.</li> <li>• Total number of introductions made to various lenders.</li> <li>• Total number of introductions made by ARs.</li> </ul>	<ul style="list-style-type: none"> <li>• Firm’s answers will need to be broken down by credit and hire.</li> <li>• Firm’s answers will also need to capture data on data relating to the underlying product and whether the vehicle is new or used.</li> <li>• Do your systems capture this level of information?</li> <li>• The FCA intends to verify data provided against PSD information provided by lenders.</li> </ul>
Section 1.5	What to consider
<p><b>Add-Ons:</b> You will need to tell the FCA about the extras or add-ons you sell to customers where these are not included in the credit or hire agreement and whether these are regulated products or not (e.g., tyre cover, service and maintenance packages, extended warranties).</p>	<ul style="list-style-type: none"> <li>• Have you considered these add-ons in your fair value assessment(s)?</li> <li>• Can you demonstrate that the cumulative price to the customer of the finance product plus any add-ons represents fair value (even where you pay a subsidy to the lender)?</li> </ul>
Section 1.6	What to consider
<p><b>Other firms that you engage with:</b></p> <ul style="list-style-type: none"> <li>• You will need to tell the FCA about the types of firms that you engage with as part of your credit broking activities. Do you introduce customers to brokers, to lenders, or both?</li> <li>• You will need to provide details of the Top 5 brokers and/or Top 5 lenders as appropriate to your business model. For each of the Top 5 you are required to provide the FCA with numerical data on:             <ul style="list-style-type: none"> <li>▪ Number of introductions</li> <li>▪ Revenue</li> <li>▪ Commission received / subsidy paid</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Does your business mix indicate a concentration with a particular lender? If you operate a panel is there an objective rationale for this?</li> <li>• How will this data sit against the questions in 1.8 in respect of how your firm is remunerated for its broking activities?</li> <li>• Is there a preferential or first refusal scheme in place with any lenders? If so, can you comfortably explain how customer outcomes do not suffer?</li> <li>• How are relationships with lenders explained to customers?</li> <li>• Have you considered what impact a preferential scheme has on your obligations in respect of commission disclosure?</li> <li>• Principals will also need to provide this information for their ARs, including total commission paid to ARs and total interdictions received from ARs.</li> </ul>

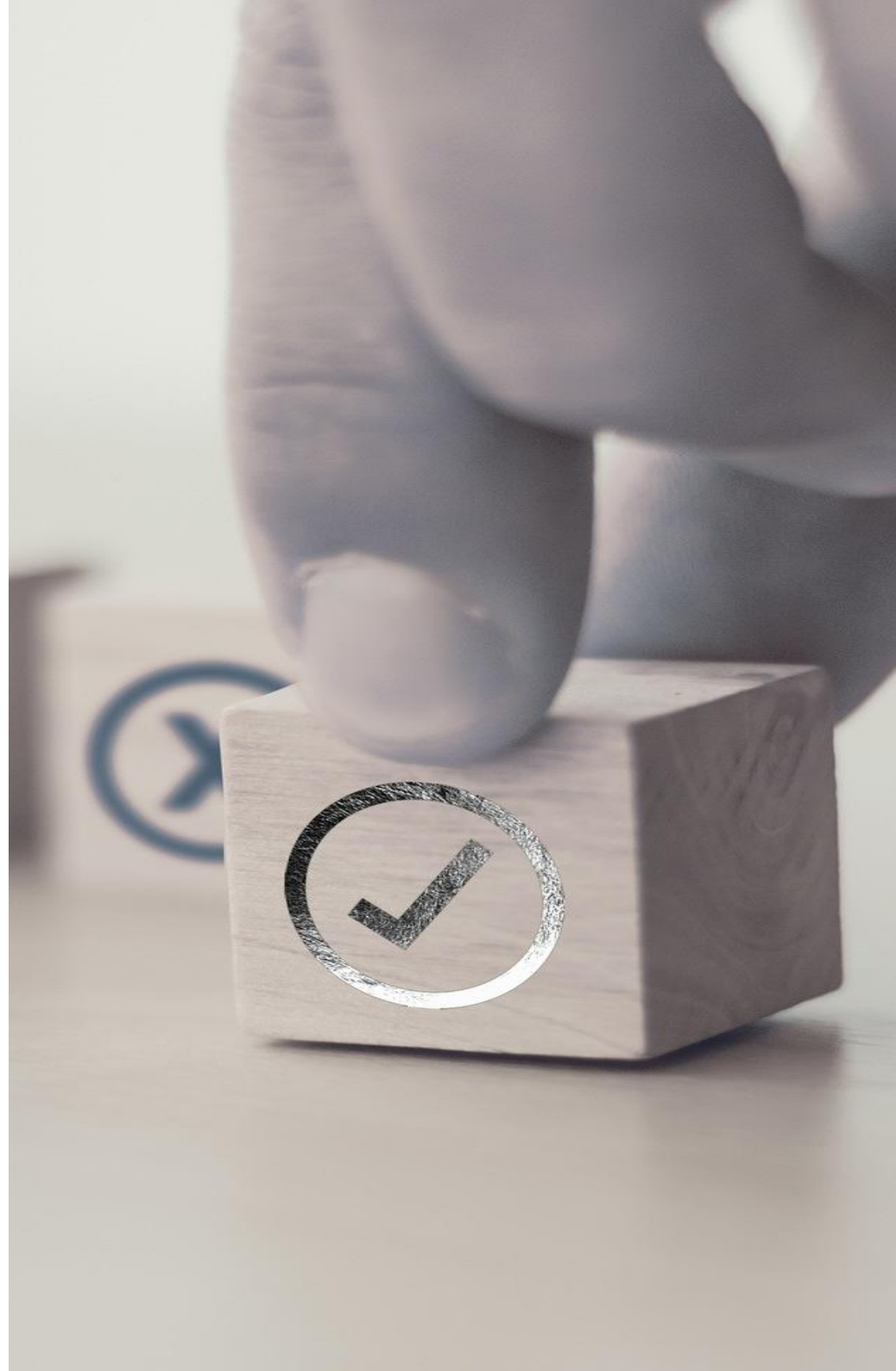
# CCR009 - CONSIDERATIONS



Section 1.8	What to consider
<p><b>Firm remuneration</b></p> <ul style="list-style-type: none"> <li>Information provided here must align and broken down by channel: <ul style="list-style-type: none"> <li>Flat fee for click through</li> <li>Flat fee for introduction</li> <li>Flat fee for successful credit agreement entered</li> <li>Percentage of transaction value</li> <li>Fee received from the individual</li> <li>Other (e.g. volume bonus)</li> </ul> </li> <li>Does your firm proactively notify individuals that you receive commission from the lender or owner?</li> </ul>	<ul style="list-style-type: none"> <li>Where your firm is paid a fee by the individual have you conducted an FVA?</li> <li>What do the figures indicate about your business model? Are you paid on a contingent basis?</li> <li>Do you have appropriate controls in place to manage any conflicts of interest?</li> <li>If you are not or only sometimes advising customers that you're paid commission, can you explain the rationale for this?</li> <li>Are you relying on a statement that commission may be paid to answer that you 'always' tell a customer commission will be paid by the lender?</li> </ul>
Section 1.9	What to consider
<p><b>Sales channel</b></p> <ul style="list-style-type: none"> <li>Which channels have customers used to purchase your products or services on credit? <ul style="list-style-type: none"> <li>Online, including website and/or app</li> <li>Email</li> <li>Telephone</li> <li>At your own physical premises, such as a store or dealership</li> <li>In an individual's home or dwelling</li> <li>Other non-trade premises</li> <li>Lead generation activities</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>The FCA will expect you to have record of your sales channels.</li> <li>Do your policies and procedures support your various sales channels?</li> <li>Do these comply with the manufacturer distribution strategy?</li> <li>Do these match your own documented distribution arrangements?</li> <li>Is there a concentration by channel(s) and can you provide a clear rationale?</li> <li>Where you are distributing off premises, can you demonstrate heightened controls and oversight?</li> <li>Do these link to a vulnerable customer policy?</li> </ul>
Section 1.10	What to consider
<p><b>Staff remuneration</b></p> <ul style="list-style-type: none"> <li>How are your sales staff remunerated in relation to your regulated activities? <ul style="list-style-type: none"> <li>Regular salary?</li> <li>Salary plus commission?</li> <li>Commission only?</li> </ul> </li> <li>What is the average % split between your sales staff salaries versus commission?</li> <li>Is commission variable based on value of product or number of sales?</li> <li>Fixed commission based on value of product or number of sales?</li> <li>Flat fee?</li> <li>Do your sales staff earn commission on the sale of goods or services?</li> </ul>	<ul style="list-style-type: none"> <li>Will your remuneration structure provoke CONC 2.11 related enquiries?</li> <li>FCA noted in CP17/20 that risks arising from incentive schemes arose primarily where staff earned bonus or commission payments based on the volume or value of sales or collections, with some elements which particularly raised the level of risk. These included schemes where: <ul style="list-style-type: none"> <li>commission accounted for the majority (or all) of customer-facing staff's pay</li> <li>different rates of commission were earned for different products (particularly substitutable ones) or products sold on different terms or</li> <li>the rate of commission varied depending on reaching certain targets</li> </ul> </li> <li>Do you have a remuneration policy? Does it support your responses on staff remuneration?</li> <li>Can you demonstrate that you have adequate oversight (including quality assurance) and monitoring in place?</li> </ul>

# NEXT STEPS

- If you would like assistance with implementation of the reporting requirements or associated remedial activity, **please reach out to a member of our team, whose contact details can be found in the next section.**



# KEY CONTACTS



**CLARE HUGHES**

Partner

+44 (0)773 100 6202

[Email Clare](#)



**MICHELLE BREWINS**

Compliance Director

(Non-Lawyer)

+447342050208

[Email Michelle](#)



**AMIT RAO**

Senior Compliance Manager

(Non-Lawyer)

+44 (0)20 7544 5404

[Email Amit](#)



**RUBY ADESUYI**

Compliance Manager

(Qualified Lawyer)

+44 (0)20 7160 3327

[Email Ruby](#)



[addleshawgoddard.com](http://addleshawgoddard.com)

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