

Being better informed

FS regulatory bulletin

FS regulatory insights

October 2024

In this month's edition:

- FCA asks banks to address account access concerns
- PRA finalises UK Basel 3.1 rules
- PRA calls on non-systemic deposit takers to strengthen credit risk management
- Government and FCA set out next steps for new retail disclosure regime



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Executive summary



Welcome to this edition of 'Being better informed', our monthly FS regulatory bulletin, which aims to keep you up to speed with significant developments and their implications across all the financial services sectors.



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September was a busy month for the regulators, as they advanced a number of policy initiatives, and progressed various supervisory work.

The PRA published a policy statement setting out the final UK rules to implement Basel 3.1. The policy statement covers areas including credit risk, credit risk mitigation, the output floor, Pillar 3, reporting, feedback to responses on the parts of Pillar 2 relating to the Pillar 2A credit risk methodology, use of internal ratings based approach benchmarks, and the interaction with the output floor. The PRA has set a 1 January 2026 implementation deadline for the Basel 3.1 package - a delay of six months from its previous consultation. In light of the proposals, firms will need to assess the impact for their business model, portfolio and products. Please see our [Hot Topic](#) publication for more information.

Alongside this, the PRA published a consultation setting out proposals to simplify the capital regime for Small Domestic Deposit Takers (SDDTs) - smaller banks that have the option to opt out of

scope of the Basel framework. Its proposals include that: Pillar 1 risk-weighted assets would be calculated using Basel 3.1 rules, with some simplifications for SDDTs; Pillar 2 would be simplified; and there would be a single, more constant capital buffer. The PRA proposes an implementation date of 1 January 2027. Our [Hot Topic](#) provides further details.

On the supervisory side, the PRA issued a Dear CRO letter, outlining the findings from a review, in which it asked the Internal Audit function of a selection of non-systemic UK Deposit Takers to undertake a review of their Credit Risk Management Framework (CRMF). The PRA notes that two-thirds of the findings in the reviews relate to notable breaches of rules around lending, further reinforcing its view that some firms need to continue to enhance their portfolio management controls and affordability assessments. The PRA identifies a number of areas for improvement, and recommends CROs reference the issues highlighted when the firm next reviews and assesses its own CRMF.

Elsewhere, the FCA published the findings of its review into payment account access and closures. The regulator calls on banks, building societies and payment firms to improve customers' access to payment accounts, in particular Basic Bank Accounts. It asks firms to review policies and procedures through the lens of the Consumer Duty, and improve data, governance and

oversight in relation to account access and closure decisions. The publication follows the FCA's September 2023 review of account closures amid concerns that customers' payment accounts may have been closed due to political beliefs or lawfully expressed views. The latest findings reaffirm the FCA's conclusion that it has not observed evidence of political views leading to account denial, suspension, or termination. Our [At a glance](#) publication provides further analysis.

Finally, the Government and FCA confirmed next steps on the design of a new retail disclosure regime. The regime will be referred to as the Consumer Composite Investments (CCI) framework and will replace the EU-inherited Packaged Retail and Insurance-based Investment Products Regulation. The Government will legislate before the end of 2024 to grant the FCA powers for this reform. The FCA plans to consult on proposed CCI rules this autumn, with a view to finalising the rules in H1 2025.

Please read on to find out more about these and other developments. You can also visit our [PwC webpage](#) for further regulatory insights.

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Contents

How to read this bulletin?

Review the Table of Contents and the relevant Sector sections to identify the news of interest. We recommend you go directly to the topic/article of interest by clicking in the [active links](#) within the table of contents.

Cross sector announcements	4
Banking and capital markets	7
Asset and wealth management	10
Insurance	11

Cross sector announcements

In this section:

Conduct	4
Digital assets	5
Disclosure	5
Enforcement	5
Financial crime	5
Pensions	5
Wholesale markets	6



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Conduct

FCA shares findings of fair value supervisory work

The FCA published a collection of insights on the [price and value outcome](#) from its first year of supervising firms against the higher standards of the Consumer Duty, on 18 September 2024.

The FCA shares insights and examples from its supervisory work in three areas where it has had long-standing concerns about value and competition: cash savings, GAP insurance and platform cash. While its work focuses on specific products, the FCA explains its insights are relevant to all sectors. However, it emphasises that smaller firms should take a reasonable and proportionate approach, based on their resources, number of clients, and the complexity of the factors being considered in their fair value assessments.

The FCA shares several key messages for firms. It expects firms to consider outcomes of the Consumer Duty holistically, this includes effectively identifying target markets for products and services to assess impacts on different customers. It also explains that an analysis of cross-subsidies in a firm's business model can be helpful for firms in identifying where different consumer groups may be at risk of not receiving fair value. Additionally, the FCA emphasises the importance of evidence in fair value assessments, and the need to take prompt action where an assessment shows customers are at risk of not receiving fair value.

The FCA plans to continue to work with firms on fair value, and to provide insights into its supervisory work on the Consumer Duty. It expects firms to improve fair value assessments over time and says it will take appropriate action where this is not the case.

See our [At a glance](#) publication for more details.

FCA calls for change in mindset on financial inclusion

Nikhil Rathi, FCA Chief Executive, called for a change in mindset to support growth and financial inclusion in a [speech](#) on 19 September 2024.

Rathi outlined several regulatory interventions and rule changes the FCA has taken to protect consumers, including the new Consumer Duty, a ban on debt advice providers receiving referral fees, guidance for lenders on supporting customers in difficulty, and a price cap on high-cost short-term credit. He also highlighted trends driven by technology which may lead to consumer harm if the risks are not adequately mitigated, such as the digitisation of payments and the hyper-personalisation of certain products enabled by artificial intelligence.

To address the causes of financial exclusion, Rathi called for:

- experimenting and taking measured risk to deliver better long-term economic outcomes
- improving financial literacy and digital literacy
- supporting digitalisation and technological innovation

- engaging in an open conversation about the risks and trade-offs of innovation with a broad coalition - Government, industry, regulators, schools, employers and civil society.

While Rathi did not make any new announcements on rule changes, the speech signals the FCA's intent to further monitor and adapt to market changes, including the digitisation of products and services, and their impact on consumers.

Digital assets

Regulators open Digital Securities Sandbox

The Bank of England (BoE) and FCA [opened](#) the Digital Securities Sandbox (DSS) on 30 September 2024. It is the first Financial Market Infrastructure (FMI) sandbox created under the FMI sandbox powers conferred on HM Treasury by the Financial Services and Markets Act (FSMA) 2023. The authorities also published [guidance on the operation of the DSS](#), and a final [policy statement](#).

The purpose of the DSS is to facilitate the use of developing technology, such as distributed ledger technology (DLT), in the issuance, trading and settlement of securities. It also aims to drive a quicker, more effective and collaborative way of delivering regulatory change.

The DSS is open to firms of all sizes and all stages of development, as long as they are legally established in the UK, undertake FMI activities in securities set out in the DSS, and have identified legal or regulatory barriers to deploying a technology. Participating firms could be existing financial institutions, which are already authorised or recognised under current regulation, or new entrants to the market.

The DSS is divided into a series of gates for sandbox entrants to move through, providing a path to progress from one stage to the next. The level of permitted activity increases with each stage. Firms will be able to undertake live business after Gate 2, including supporting the issuance, trading and settling

of digital securities, in broadly the same way as traditional securities.

The DSS will be operational until December 2028 and can be extended by the Government.

See our [At a glance](#) publication for more information.

Disclosure

Govt and FCA update on Consumer Composite Investments framework

The Government and the FCA confirmed timings for their next steps on the design of a [new retail disclosure regime](#) on 19 September 2024. The regime will be referred to as the Consumer Composite Investments (CCI) framework and will replace the EU-inherited Packaged Retail and Insurance-based Investment Products (PRIIPs) Regulation.

The Government will legislate before the end of 2024 to grant the FCA powers for this reform. The FCA will consult on proposed CCI rules this autumn, with a view to finalising the rules in H1 2025, allowing firms to start transitioning to the new framework from that point.

Additionally, the FCA published a [statement on forbearance](#) in relation to investment trusts. It confirms investment trusts will be temporarily exempt from current PRIIPs requirements, and the FCA will not enforce these rules from 19 September 2024 until the start of the new CCI framework. The FCA has taken this step based on industry concerns on how current cost disclosure requirements are affecting the closed-ended listed investment fund sector and resulting in unhelpful cost information for consumers. The FCA clarifies that when the new CCI framework is in effect, it will include investment trusts.

Enforcement

FCA signals changing approach to 'name and shame' proposals

Therese Chambers, joint FCA Executive Director of Enforcement and Market Oversight, gave a [speech](#) at the AFME Annual European Compliance and Legal conference on 24 September 2024, in which she outlined the FCA's evolving approach to enforcement.

Addressing the feedback received on the FCA's [proposals](#) to 'name and shame' firms subject to investigation prior to an outcome being reached, Chambers said the FCA will not be rushing into any decisions. She outlined the FCA's view that the case for more transparency remains strong but needs to be seen within the wider context of the FCA's evolving approach to enforcement, including a more streamlined caseload and faster outcomes.

The FCA will publish further details of its proposals later this autumn, which will include information on any new public interest test that will be applied when investigations are announced publicly, case studies examining how the criteria for announcement might apply, and the number of cases that could be affected.

Chambers also highlighted the FCA's focus on reducing financial crime through enforcement action, collaboration with other regulators to secure enforcement outcomes, and the FCA's expanding data and technology capabilities supporting its market oversight and enforcement work.

Financial crime

FCA updates on financial crime approach

Sarah Pritchard, the FCA's Executive Director of Markets and International, delivered a [speech](#) at the Financial Crime Summit on 5 September 2024. The speech stresses the importance of a targeted and outcomes-focused approach to tackling financial crime, utilising data to spot irregularities and share best practices beyond the financial services sector.

Pritchard states that the FCA continues to make interventions to prevent financial crimes before they occur, particularly at the authorisation stage for new firms. The emphasis will be on innovative methods using data and technology to prevent financial crime, including scanning websites to identify illegal financial promotions.

The FCA says it continues to enhance collaboration and information sharing among regulatory, intelligence, and law enforcement agencies. This includes working under the national economic crime plan to support system-wide improvements and ensure rigorous standards are met by all firms.

Pensions

Government issues Call for Evidence on pensions investments review

The Government published a [Call for Evidence](#) on 4 September 2024, to inform the first phase of its [landmark pensions review](#). This review was announced by the Government on 20 July 2024, and aims to boost investment, increase saver returns and tackle waste in the pensions system.

The Call for Evidence seeks to inform the Government's policy development in several areas. These include driving scale and consolidation of defined contribution workplace schemes, as well as tackling fragmentation and inefficiency in the Local Government Pension Scheme through consolidation and improved governance.

The Call for Evidence also explores the structure of the pension ecosystem, particularly through the lens of achieving a greater focus on value to deliver better outcomes for future pensioners. Additionally, it considers encouraging pension investment into UK assets to boost growth across the country. The Call for Evidence closes on 25 September 2024.

Wholesale markets

Accelerated Settlement Taskforce publishes draft recommendations on T+1

The Accelerated Settlement Taskforce Technical Group (TGT) published its [draft recommendations](#) report on 27 September 2024. The report outlines a series of measures that market participants, industry bodies and regulators should take to achieve a successful transition to a shorter settlement cycle (T+1) for securities in the UK.

The draft report makes 43 principal recommendations and 14 additional recommendations, as well as clarifying which instruments will be in scope of T+1. However, it does not provide confirmation of the date the UK will move to T+1, in part due to ongoing uncertainty over the timing of T+1 in the EU and Switzerland.

Many of the recommendations are aimed at market participants, trade bodies and financial market infrastructures (FMIs). The draft report underlines the collective effort needed for the UK to achieve a successful transition to T+1 settlement, including through the automation of as many processes involved in the trading, clearing and settling of in-scope securities as possible.

The TGT's final report will include the precise dates by which its recommendations will need to be implemented. The report is due to be published before year end.

Our [At a glance](#) publication contains further information.

Banking and capital markets

In this section:

Capital and liquidity	7
Conduct	8
Financial crime	8
Payments	9
Supervision	9



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Capital and liquidity

PRA shares findings from Internal Audit review of Credit Risk Management Frameworks

The PRA issued a [Dear CEO letter](#) on 10 September 2024, outlining the findings from a review in which it asked the Internal Audit (IA) functions of a selection of non-systemic UK Deposit Takers (UKDT) to undertake a review of their Credit Risk Management Framework (CRMF).

The PRA notes that two-thirds of the findings in the IA reviews relate to notable breaches of rules around lending, further reinforcing its view that some firms need to continue to enhance their portfolio management controls and affordability assessments. The PRA identifies specific areas for improvement:

- Affordability assessments: improve controls on the refresh of rules, buffers, judgements and/or data to reflect changes in macroeconomic or market trends more quickly.
- Enhance quality assurance controls and underwriting processes.
- Enhancements to management information (MI), including having forward-looking MI, adding supporting commentary to charts and trends, and more relevant metrics at board level on the quality of new lending.
- Credit risk appetite: calibrate limits, align with business strategy and lending and collections policies, and establish escalation processes for breaches.
- Enhance governance and control processes around lending policies.

- Establish detailed contingency plans for collections.

The PRA recommends CROs reference the issues highlighted in the review when the firm next reviews and assesses its own CRMF.

The review involved 33 non-systemic banks and building societies and was designed to provide assurance to the firms' Boards and PRA on the overall effectiveness of the control framework, particularly in relation to credit and affordability assessments, approval processes and portfolio management.

PRA finalises Basel 3.1 rules

The PRA published Policy Statement [PS 9/24](#) on 12 September 2024, setting out the final UK rules on credit risk and the output floor to implement the Basel Committee on Banking Supervision (BCBS) reforms known as Basel 3.1.

The PRA estimates that the Tier 1 capital requirements of major UK firms will be virtually unchanged by the final rules, with an aggregate increase of less than 1% when the rules are fully phased in. Firms will need to assess the impact for their own business model, portfolio and products as average impacts can be misleading. The PRA has tailored the final rules to reflect its secondary competitiveness objective and its view of certain risks but, overall, the final rules are materially aligned with the [BCBS standards](#), with less divergence than the EU.

Most of the rules are finalised in line with the consultation but there are some changes which reduce over-conservatism and address operational implementation issues in certain targeted areas. For example, in the standardised approach to credit risk, the PRA has retained the more risk sensitive approach for unrated corporates and funds. In addition,

the CRR support factor for Small and Medium Enterprises and infrastructure lending will be removed from Pillar 1. The PRA has set the implementation deadline as 1 January 2026 - a delay of six months from the proposals.

Read our [Hot Topic](#) for more information on the UK Basel 3.1 rules.

PRA consults on Strong and Simple capital framework

The PRA published a [consultation](#) on 12 September 2024 setting out the PRA's proposals to simplify the capital regime for Small Domestic Deposit Takers (SDDTs).

The Strong and Simple consultation proposes simplifications to all elements of the capital stack for SDDTs, which are smaller banks that will not be in scope of the Basel framework. The PRA's proposals include that:

- Pillar 1 risk-weighted assets (RWAs) would be calculated using Basel 3.1 rules for credit risk (but without due diligence requirements) and operational risk to SDDTs.
- Pillar 2 methodologies would be simplified. Key changes include the removal of the internal ratings based benchmarking methodology for credit risk, a simplified credit concentration risk calculation and a bucket approach for operational risk with firms allocated to one of three risk levels, each with a corresponding capital requirement.
- There would be a single, more constant and predictable capital buffer. This will be set at no less than 3.5% of RWAs but may be higher based on individual firm risks and management.

The PRA has proposed that the implementation date for the simplified capital regime for SDDTs will be 1 January 2027, with the consultation period closing on 12 December 2024. For more information, please see our [Hot topic](#) publication.

PRA outlines benefits of Strong and Simple proposals

PRA Executive Director for Prudential Policy, David Bailey, delivered a [speech](#) on 20 September 2024 discussing the PRA's recent consultation on the capital-related aspects of the Strong and Simple prudential framework for small banks and building societies.

Bailey highlighted the PRA's view of the benefits of the proposals, which include targeted and proportionate changes to simplify the capital regime and reduce cost and complexity for Small Domestic Deposit Takers (SDDTs). Bailey highlighted the PRA's intention to balance the reduction in regulatory complexity for smaller firms, with the need to maintain resilience.

Bailey provided an overview of the PRA's policy proposals, including simplifying all aspects of the capital stack including Pillar 1, Pillar 2A, buffers, and the calculation of regulatory capital. Bailey added that the approach adopted by the PRA intends to support smaller firms' ability to pursue innovation and growth, particularly in areas of the economy where smaller firms play an important role, for example in providing financial services to under-financed sectors. The consultation closes on 12 December 2024, with the proposed implementation date set as 1 January 2027.

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tailored the final rules to reflect its secondary competitiveness objective and its view of certain risks but, overall, the final rules are materially aligned with the [BCBS standards](#), with less divergence than the EU.

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Read our [Hot Topic](#) for more information on the UK Basel 3.1 rules.

Conduct

FCA asks banks to address account access concerns

The FCA published the [findings](#) of its review into payment account access and closures on 4 September 2024. The regulator calls on banks, building societies and payment firms to improve customers' access to payment accounts, in particular Basic Bank Accounts (BBAs). It asks firms to review policies and procedures through the lens of the Consumer Duty, and improve data, governance and oversight in relation to account access and closure decisions.

The publication follows the FCA's [September 2023](#) review of account closures amid concerns that customers' payment accounts may have been closed due to political beliefs or lawfully expressed views. The latest findings reaffirm the FCA's conclusion that it has not observed evidence of political views leading to account denial, suspension, or termination. The FCA has asked that an appropriate SMF holder at payment account providers to sign an attestation confirming their firm has not denied, suspended or

terminated payment accounts due to customers' political beliefs or lawfully expressed views, and that their systems and controls enable them to be confident in that statement.

The FCA also identifies concerns with firms' approach to the provision of BBAs, how firms apply 'reputational risk' and financial crime considerations in account access decisions, and experiences of customers in vulnerable circumstances. Across these issues, the FCA asks payment account providers to take note of its expectations and make any necessary improvements; this will form part of ongoing FCA supervision over the next several months.

See our [At a glance](#) publication for further details.

FCA confirms extension to motor finance complaint rules pause

The FCA issued a [policy statement](#) (PS24/11) on 24 September 2024 confirming it is extending the pause on the usual eight-week deadline for responding to motor finance complaints, as consulted on in July 2024. Due to delays in its review of past use of discretionary commission arrangements, the regulator is extending the pause until 4 December 2025. It reiterates its intention to set out next steps following its review in May 2025.

Financial crime

PSR consults on APP reimbursement limit

The Payment Systems Regulator (PSR) [issued](#) a consultation on the Authorised Push Payment (APP) scam reimbursement limit on 4 September 2024.

The consultation sets out the PSR's proposal to change the maximum level of reimbursement for the Faster Payments APP scams reimbursement requirement. The PSR proposes to set the initial maximum level of reimbursement to £85,000 per Faster Payments APP scam claim. This aligns with

the Financial Services Compensation Scheme reimbursement limit. The previous maximum reimbursement value had been set at £415,000, in line with the Financial Ombudsman Service maximum reimbursement limit at that time.

The consultation closes on 18 September 2024. The PSR is not proposing any other changes to the policy or to the implementation date itself. The start date for the policy remains 7 October 2024.

FCA consults on APP fraud changes

The FCA [issued](#) a consultation on changes to Payment Services and Electronic Money Approach Document (Approach Document) on 9 September 2024. This is to support the new legislation to tackle authorised push payment (APP) fraud.

HM Treasury [previously](#) announced amendments to the Payment Services Regulations (PSRs 2017). The change allows Payment Service Providers (PSPs) to delay processing outbound payment transactions for up to four business days and enable PSPs to adopt a risk-based approach to preventing APP fraud.

The FCA proposes details of how PSPs should apply the legislative changes. As the 'reasonable grounds to suspect fraud or dishonesty' consideration is an objective test, the FCA's proposed updates include explaining what PSPs will need to be able to demonstrate to show that they have met this test, as well as examples of factors which might increase the risk a payment order has been made subsequent to fraud or dishonesty.

Under the amended regulations, PSPs must notify the payer on transaction delays and give them information about the reasons and how to resolve them. The FCA proposes that it is likely that PSPs will need a real-time human interface, such as a phone service, to respond to customers' questions, provide effective support and deliver good customer outcomes. The consultation also outlines how the FCA proposes PSPs address suspicious inbound payments, while continuing to process payments quickly and efficiently.

The consultation closed on 4 October 2024. The FCA will publish a revised Approach Document for payment services by the end of 2024. Once the payments delay legislation has come into effect, the FCA will establish a process to monitor and evaluate its implementation by PSPs.

Payments

FCA proposes new safeguarding rules for payments firms

The FCA issued a [consultation](#) on 25 September 2024, setting out proposals to make safeguarding rules stronger and clearer for payments and e-money firms. Under the proposals, the existing e-money safeguarding regime will be replaced with a client assets (CASS) style regime, which will be designed to work with payments firms' business models.

The FCA proposes to make changes in two stages. The consultation covers both stages of the proposed regime. In the interim-state, in advance of legislative change, the FCA's proposed rules will supplement the current safeguarding requirements in the Payment

Services Regulations 2017 (PSRs) and E-Money Regulations 2011 (EMRs). In the end-state, the rules will entirely replace the current safeguarding requirements in the PSRs and EMRs, when their revocation is commenced.

The interim-state proposals include improving books and records, enhancing monitoring and reporting, as well as strengthening elements of safeguarding practices. The end-state proposals would further strengthen elements of safeguarding practices and set new requirements on holding funds under a statutory trust.

Once the new rules have been published, the FCA proposes to give firms six months to implement the interim-state rules and 12 months to implement the end-state rules. Firms will also be required to periodically review their use of third parties for safeguarding purposes. They will be required to review existing arrangements within three months of the rules coming into force.

The consultation closes on 17 December 2024. The regulator has so far confirmed that it will publish strengthened interim-state safeguarding rules by the middle of 2025.

Read our [At a glance](#) publication for more information.

Supervision

PRA shares feedback on accounting for IFRS 9 ECL and climate risk

The PRA sent a [letter](#) to CFOs of selected deposit takers on 27 September 2024, summarising feedback from the 2024 review of written auditor reports. Annually, the PRA

receives reports from auditors of major UK-headquartered banks and building societies, focusing on issues of supervisory interest. This year, the review concentrated on IFRS 9 expected credit loss (ECL) accounting, and accounting for climate risks.

The PRA acknowledged firms' progress in redeveloping IFRS 9 models and enhancing risk monitoring, but noted it continues to see variations in practice and areas for improvement. It found that model risk remains elevated, and firms should challenge the completeness of post model adjustments to ensure provisions reflect actual expectations of credit losses. The PRA also found that default experience remains limited, meaning loss given default (LGD) models remain calibrated on historical data. It says firms should challenge whether the recovery assumptions that drive LGD are realistic, and compensate for the risk of historical bias where uncertainty exists over recovery outcomes.

Regarding climate risk, the PRA says it was reassured to see firms taking action to consider a wider range of climate-related risk drivers to help identify those exposures most at risk, and to challenge how to adapt their economic scenarios to incorporate climate risks. It sets out several areas for further development, including expanding the coverage of portfolios for which climate-related risk drivers are formally assessed.

To help firms identify improvements, the PRA sets out the range of practices it saw, as well as areas of focus for the near term and medium term.

Asset and wealth management

In this section:



Please refer to the Cross sector announcements section on p. 4 for developments that may be relevant to Asset management.

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Insurance

In this section:

Capital and liquidity	11
Competition	11



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Capital and liquidity

PRA confirms timing for final Solvency UK rules package

The PRA issued a short [statement](#) on 23 September 2024, confirming it will publish its final package of rules on its Solvency UK review in mid-November 2024. The new rules will come into effect on 31 December 2024.

The PRA issued a further [statement](#) on 25 September 2024, to provide an update to firms that hold PRA directions on waivers or modifications of PRA rules. The PRA anticipates that changes may be required to the wording of these directions to reflect final PRA rules on Solvency UK effective from 31 December 2024. The PRA confirms it will contact impacted firms in mid-November to explain the process for varying the wording of their directions. Firms will need to ensure they provide their consent before 30 December 2024 to ensure continuation of their directions.

Competition

PRA speech marks first anniversary of competitiveness and growth objective

Shoib Khan, Director of Insurance Supervision at the PRA, delivered a [speech](#) at the Bank of America Securities Annual Financials CEO Conference on 26 September 2024. Khan discusses the significance of the first anniversary of the PRA's secondary competitiveness and growth objective and its implications for the UK insurance sector. Khan reaffirms the PRA's commitment to maintaining trust in the UK prudential framework, adopting effective regulatory processes, and being responsive to UK-specific risks and opportunities.

Khan discusses the increased use of funded reinsurance for bulk purchase annuity business,

and notes the [PRA's new policy on managing funded reinsurance risks](#) to ensure there are mitigants in place. Firms are required to complete a gap analysis against the PRA's policy expectations by the end of October 2024. Khan also reflects on the changes introduced by Solvency UK to support productive investments in the UK economy.

On third country branches, Khan reflects on the PRA's updated approach to authorising and supervising these firms, making the UK market more accessible for international insurers and reducing regulatory duplication. The PRA also aims to support innovation, particularly in the growing cyber insurance sector, and work closely with the Society of Lloyd's to enhance regulatory efficiency and oversight.

Khan confirms the PRA's reform plans in the coming months to the Insurance Special Purpose Vehicle regime to allow varied transaction structures and streamline application and approval processes. Additionally, the PRA plans to consult later this year on an accelerated pathway for catastrophe bond applications to make the process quicker and more efficient.

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Wholesale markets

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