MEMA
CONSULTANTS

REGULATORY INSIGHT

# UK Regulatory Horizon: Sept 2026 to Sept 2027

A dated, sourced horizon of confirmed FCA, PRA and HM Treasury rule changes hitting UK…

Insight. Clarity. Confidence.

# UK Regulatory Horizon: Sept 2026 to Sept 2027

A dated, sourced horizon of confirmed FCA, PRA and HM Treasury rule changes hitting UK regulated firms over the next 12 months.

MEMA Consultants · Regulatory Insight · Published 23 August 2026

Firms often treat "horizon scanning" as a box-ticking exercise built on vague trailers of what might be coming. The more useful exercise is narrower: what has the FCA, the PRA or HM Treasury actually confirmed, with a date attached, that will land on a firm's desk in the next twelve months. This note sets out that confirmed horizon only, drawing on primary sources (FCA, Bank of England/PRA, HM Treasury, UK Parliament) supplemented by law firm briefings where they add practical colour. Where a date is still provisional or a policy is paused, that is stated explicitly rather than smoothed over.

## The dated horizon

| Date | What | Status | Who it affects | Source |
|---|---|---|---|---|
| 7 May 2026 | FCA "Supplementary Regime" for payments/e-money safeguarding (PS25/12) came into force | In force (already live; firms should be embedding, not starting) | Authorised payment institutions, authorised and small e-money institutions, credit unions issuing e-money | FCA PS25/12 |
| 30 June 2026 | Motor finance redress scheme: firms must be ready to handle claims for loans from 1 April 2014 onwards (Scheme 2) | In force / deadline passed | Motor finance lenders and brokers | FCA PS26/3 |
| 13 July 2026 | Critical Third Parties regime went live for the first four designated providers (AWS, Google Cloud, Microsoft, Oracle) | In force | Firms relying on these cloud/tech providers, indirectly all regulated firms using them | FCA/Bank of England joint statement, July 2026 |

| Date | What | Status | Who it affects | Source |
|---|---|---|---|---|
| 31 August 2026 | Motor finance redress scheme: firms must be ready for loans agreed before 1 April 2014 (Scheme 1) | In force / deadline imminent | Motor finance lenders and brokers | FCA PS26/3 |
| 7 September 2026 (expected) | Report Stage of the Financial Services and Markets Bill in the House of Lords | Legislation in progress | All firms affected by CCA reform and PSR abolition (see below) | UK Parliament, Financial Services and Markets Bill [HL] progress pages |
| 18 September 2026 | Consultation CP26/23 (Consumer Duty: scope and proportionality) closes | Consultation open until this date | All firms subject to the Consumer Duty, especially wholesale/manufacturer/distribution-chain roles | FCA CP26/23 |
| 30 September 2026 | Cryptoasset regime authorisation application window opens | Final rules confirmed, commencing on this date | Firms carrying on regulated cryptoasset activities, stablecoin issuers, custodians | FCA policy statements PS26/9–PS26/13 |
| 28 February 2027 | Cryptoasset regime authorisation application window closes | Final rules, deadline confirmed | Same as above | FCA policy statements PS26/9–PS26/13 |
| 1 January 2027 | Basel 3.1 implementation date (main package; FRTB market-risk internal models delayed to 1 January 2028) | Final rules, commencing on this date | PRA-regulated banks and PRA-designated investment firms | Bank of England/PRA PS1/26 |
| Q1 2027 (expected) | FCA policy statement and new rules following CP26/23 (Consumer Duty scope) | Expected, not yet confirmed as final | Same population as CP26/23 | FCA CP26/23 |

| Date | What | Status | Who it affects | Source |
| --- | --- | --- | --- | --- |
| 18 March 2027 | New operational incident and third-party reporting obligations come into force (FCA PS26/2, PRA SS1/26) | Final rules, commencing on this date | Firms and FMIs already in scope of the 2021 operational resilience regime | FCA PS26/2 / PRA SS1/26, March 2026 |
| 8 June 2027 | Consumer Composite Investments (CCI) regime rules come fully into force, replacing PRIIPs KID/UCITS KIID | Final rules, commencing on this date (optional transition already open since 6 April 2026) | Manufacturers and distributors of retail investment products, asset managers, platforms, advisers | FCA PS25/20 |
| 25 October 2027 | Full scope of the cryptoasset regulatory regime commences (regulated activities expand beyond the initial perimeter) | Final rules, commencing on this date | All firms carrying on regulated cryptoasset activities in/into the UK | FCA policy statements PS26/9–PS26/13 |
| Not yet fixed | Second-stage ("end state") safeguarding regime with statutory trust, requiring changes to PSRs 2017/EMRs 2011 | Proposed; expected after a further HMT consultation on payment services law "later in 2026" | Payment and e-money institutions | FCA PS25/12; HM Treasury payment services law workstream |
| Not yet fixed | Consumer Credit Act 1974 reform: repeal of most prescriptive CCA provisions, replaced by FCA rules | Proposed; primary legislation (Financial Services and Markets Bill) in progress, FCA to consult separately on replacement rules afterwards | Consumer credit lenders, brokers, debt firms | HM Treasury policy statement, 18 May 2026; UK Parliament bill pages |

| Date | What | Status | Who it affects | Source |
|---|---|---|---|---|
| Not yet fixed | Payment Systems Regulator abolished, functions absorbed into the FCA | Proposed; HMT confirmed direction of travel but has not set a completion date, pending primary legislation | Payment system operators, participants, card schemes | HM Treasury consultation response, 21 April 2026 |
| Paused, no date | SDR regime extension to portfolio managers | On hold since April 2025 pending FCA review of consultation feedback | Wealth managers, model portfolio providers, discretionary portfolio managers | FCA update on CP24/8, April 2025 |

### What each major item actually requires

**Payments and e-money safeguarding (live now, second stage still to come).** The Supplementary Regime under PS25/12 has been in force since 7 May 2026: firms should already have improved books and records, enhanced daily/weekly reconciliation and monitoring, and a resolution pack. If a firm is still treating this as a project rather than business as usual, that is now a live compliance gap, not a forward risk. The bigger structural change, a full CASS-style regime with a statutory trust over relevant funds, needs primary legislative change to the Payment Services Regulations 2017 and Electronic Money Regulations 2011. The FCA has said it will consult again once HM Treasury's payment services law consultation lands "later in 2026." There is no commencement date yet. Firms should treat the current regime as the baseline and expect a further, more structural consultation before this horizon closes.

**Motor finance redress.** The two implementation deadlines (30 June and 31 August 2026) are now either passed or imminent. What is still ahead: firms have three months from the end of their implementation period to tell eligible complainants their outcome, and six months to proactively contact potentially eligible non-complainants, who then get a further six months to respond. The FCA has said it expects most redress to be paid by the end of 2027, and 31 August 2027 is the final date on which a consumer can raise a new complaint. That is not a universal cut-off: a consumer who is proactively contacted has six months from that contact to opt in, so some entitlements run past August 2027 depending on when the firm reaches them. Firms in scope should be able to evidence, right now, that their contact and calculation methodology matches PS26/3, because the compliance risk over the next year is in execution, not in further rule changes.

**Cryptoasset regime.** This is the single largest event on the horizon for crypto firms. The FCA finalised the core rulebook on 30 June 2026 across five separate policy statements: PS26/9 (admissions, disclosures and market abuse), PS26/10 (stablecoin issuance), PS26/11 (regulated cryptoasset activities), PS26/12 (the prudential regime) and PS26/13 (application of the wider Handbook). On 25 October 2027 the Financial Services and Markets Act 2000 (Cryptoassets) Regulations 2026 bring six activities into the perimeter: operating a qualifying cryptoasset trading platform, dealing in qualifying cryptoassets as principal or as agent, arranging deals, arranging qualifying cryptoasset staking, issuing a qualifying stablecoin, and safeguarding qualifying cryptoassets. The authorisation application window runs 30 September 2026 to 28 February 2027, and the FCA has been explicit that firms should apply as early in that window as possible to maximise time trading under transitional/"savings" provisions before the regime's scope fully expands on 25 October 2027. Any firm currently operating under the Temporary Registration Regime or the cryptoasset financial promotions regime needs a live authorisation project now, not next spring, given the volume of applications the FCA is likely to receive in a five-month window.

**Basel 3.1.** After a one-year delay, the main package now applies from 1 January 2027, with the market-risk internal models approach (FRTB-IMA) pushed back a further year to 1 January 2028. This affects PRA-regulated banks and PRA-designated investment firms directly. Most MEMA clients sit outside PRA prudential regulation, but any payments or crypto firm that holds, or is acquiring, a banking licence, or that has group entities that are PRA-regulated, needs to confirm which entity in the group is in scope and check capital and reporting build timelines against the 1 January 2027 date.

**Consumer Duty scope and proportionality (CP26/23).** The FCA itself has concluded that the Duty has, in places, been applied more widely and intensively than intended, particularly in wholesale markets and complex distribution chains, adding cost without a clear retail benefit. CP26/23 proposes removing non-UK retail business from scope, clarifying when firms in a distribution chain can rely on each other, and clarifying the interaction with product governance rules. The consultation closes 18 September 2026, with a policy statement and final rules expected in Q1 2027 (an FCA expectation, not yet confirmed). Firms should not assume the Duty is about to get lighter across the board; this is a targeted scope clarification, and firms with materially UK-retail-facing books should not change their current Consumer Duty governance in anticipation of rules that do not yet exist.

**Consumer Composite Investments (CCI).** This replaces the PRIIPs KID and UCITS KIID with a "Product Summary" model, giving manufacturers more flexibility in how they present costs, risks and returns, explicitly built around the Consumer Duty. The optional transition period opened 6 April 2026, letting manufacturers choose now between the old and new disclosure approach; the regime becomes mandatory on 8 June 2027. That gives firms just over a year from today to redesign disclosure documents, update production systems, and get new governance and sign-off processes in place. Firms that manufacture or distribute PRIIPs/UCITS-disclosed products should have a CCI transition plan with an owner and a target go-live date well before June 2027, because document redesign, legal review and system changes for a fund range typically take longer than firms expect.

**Consumer Credit Act reform and the Payment Systems Regulator merger.** Both changes are being carried through the same vehicle, the Financial Services and Markets Bill, introduced in the House of Lords on 19 May 2026, with Committee Stage completing 8 July 2026 and Report Stage expected to begin 7 September 2026. HM Treasury published its policy statement responding to the Phase 1 CCA consultation on 18 May 2026, confirming it will repeal most of the prescriptive 1974 Act provisions and replace them with FCA rules underpinned by the Consumer Duty. Separately, HM Treasury confirmed in April 2026 that it intends to abolish the Payment Systems Regulator and fold its functions into the FCA, but its own consultation response states plainly that no date has been set for the necessary primary legislation, and that further detail will come "as soon as parliamentary time allows." As at 20 August 2026 the Bill has completed Committee Stage and is awaiting Report Stage; it has not had Third Reading, has not been considered by the Commons, and has not received Royal Assent. Firms in consumer credit and payment systems should track the Bill's progress but should not expect operative rule changes from either strand within the next twelve months; the FCA still has to consult separately on replacement CCA rules once the Bill has Royal Assent, and law firm commentary suggests firms are unlikely to feel the practical effect of PSR consolidation before 2028.

**Critical Third Parties.** The regime is now live for the first four designated providers, all major cloud and technology firms. This does not create a direct new obligation on smaller regulated firms, but it does raise the bar on what "good" third-party risk management looks like, and firms should expect the FCA's supervisory expectations on outsourcing and operational resilience (see below) to increasingly reference the CTP oversight framework when assessing firms' own due diligence on cloud providers.

**Operational resilience reporting.** The core operational resilience regime (important business services, impact tolerances) has been in force since 31 March 2025; that deadline has passed and the FCA's March 2026 review found weaknesses in third-party mapping, scenario severity and stale self-assessments across the sector. New rules published as PS26/2 (FCA) and SS1/26 (PRA) introduce fresh operational incident and third-party reporting obligations, commencing 18 March 2027. Firms already subject to the operational resilience regime should treat the FCA's March 2026 observations as a preview of what supervisors will test against, and should build incident and third-party reporting processes now so they are tested well ahead of the March 2027 commencement.

**SDR extension to portfolio managers.** Worth flagging precisely because it is not dated. The FCA paused its plan to extend Sustainability Disclosure Requirements to portfolio and wealth managers in April 2025 after reviewing consultation feedback, and no restart date has been announced. Wealth managers and discretionary portfolio managers should not build compliance timelines around the original (now superseded) December 2025/December 2026 dates that circulated before the pause; treat this as a watch item, not a project with a deadline.

### What to do in the next 90 days

1. **Crypto firms**: confirm your Part 4A/cryptoasset authorisation strategy now. With a five-month application window opening 30 September 2026, build the application, gap-analyse against the finalised prudential, safeguarding and conduct rules in PS26/9-PS26/13, and target submitting early in the window rather than close to 28 February 2027.
2. **Payments and e-money firms**: audit actual embedding of the PS25/12 Supplementary Regime (reconciliation frequency, records, resolution pack) rather than assuming the May 2026 project is closed. Separately, assign someone to monitor HM Treasury's payment services law consultation for the second-stage safeguarding proposals.
3. **Motor finance firms**: pressure-test your redress calculation methodology and customer contact tracking against PS26/3 now, given the rolling notification and response deadlines running through 2027.

4. **Investment firms, fund managers, advisers and platforms**: stand up a named CCI transition owner and a target internal go-live date ahead of 8 June 2027; decide whether to adopt the Product Summary early under the optional transition that opened in April 2026.
5. **All Consumer Duty firms with wholesale, manufacturer or distribution-chain exposure**: read CP26/23 now and prepare a response before it closes on 18 September 2026; this is a genuine opportunity to shape scope before Q1 2027 rules are finalised.
6. **Consumer credit and payment systems firms**: track Report Stage of the Financial Services and Markets Bill (expected from 7 September 2026) but do not build a 2026/27 compliance project around CCA replacement rules or PSR consolidation; neither has a commencement date yet.
7. **Any firm relying on AWS, Google Cloud, Microsoft or Oracle for critical functions**: review third-party due diligence and exit-planning documentation now that these are formally designated Critical Third Parties, since supervisory expectations on cloud outsourcing are visibly tightening.
8. **Firms already in the operational resilience regime**: read the FCA's March 2026 observations on self-assessment weaknesses and start building toward the 18 March 2027 incident and third-party reporting obligations rather than waiting for a formal reminder closer to the date.

---

## Sources


1. FCA, "PS25/12: Changes to the safeguarding regime for payments and e-money firms", commencement date of Supplementary Regime (7 May 2026), scope of firms in scope, status of end-state/post-repeal regime. https://www.fca.org.uk/publications/policy-statements/ps25-12-changes-safeguarding-regime-payments-and-e-money-firms (accessed 2026-08-20)
2. FCA, "FCA sets out changes to payment safeguarding rules" press release, confirms two-stage reform approach and 7 May 2026 date. https://www.fca.org.uk/news/press-releases/payment-safeguarding-rules-changes (accessed 2026-08-20)
3. FCA, "PS26/3: Motor finance consumer redress scheme", 30 June 2026 and 31 August 2026 firm-readiness deadlines, notification timelines. https://www.fca.org.uk/publications/policy-statements/ps26-3-motor-finance-consumer-redress-scheme (accessed 2026-08-20)
4. FCA, "FCA confirms motor finance redress scheme" statement, notification/contact timelines, 31 August 2027 final consumer complaint deadline, expectation that most redress paid by end of 2027. https://www.fca.org.uk/news/statements/fca-confirms-motor-finance-redress-scheme (accessed 2026-08-20)
5. FCA and Bank of England, joint statement on Critical Third Parties designation, 13 July 2026 go-live and identity of first four designated providers (AWS, Google Cloud, Microsoft, Oracle). https://www.fca.org.uk/news/statements/uk-financial-regulators-overseeing-critical-third-parties-announced-treasury (accessed 2026-08-20)
6. FCA, "CP26/23: Consumer Duty: scope and proportionality", consultation close date 18 September 2026, expected policy statement Q1 2027, proposed scope changes. https://www.fca.org.uk/publications/consultation-papers/cp26-23-consumer-duty-scope-and-proportionality (accessed 2026-08-20)
7. FCA, "Overview of our cryptoassets regime policy statements", application window (30 September 2026 to 28 February 2027), full regime commencement 25 October 2027, list of PS26/9-PS26/13. https://www.fca.org.uk/publications/policy-statements/cryptoasset-regime (accessed 2026-08-20)
8. FCA, "CP26/4: Application of FCA Handbook for regulated cryptoasset activities – part 2", confirms consultation sequence underpinning the finalised regime. https://www.fca.org.uk/publications/consultation-papers/cp26-4-application-handbook-regulated-cryptoasset-activities-II (accessed 2026-08-20)
9. Bank of England/PRA, "PS1/26 – Implementation of Basel 3.1: Final rules" (referenced via secondary reporting where primary page access was blocked), 1 January 2027 main implementation date, FRTB-IMA delayed to 1 January 2028, full

implementation retained at 1 January 2030. https://www.bankofengland.co.uk/prudential-regulation/publication/2026/january/implementation-of-the-basel-3-1-final-rules-policy-statement (accessed 2026-08-20, page returned HTTP 403; date corroborated via Moody's, PwC UK, A&O Shearman, Addleshaw Goddard and Grant Thornton briefings)

10. FCA, "PS25/20: Supporting informed decision making: Final rules for Consumer Composite Investments", optional transition period from 6 April 2026, mandatory rules from 8 June 2027. https://www.fca.org.uk/publications/policy-statements/ps25-20-supporting-informed-decision-making-final-rules-consumer-composite-investments (accessed 2026-08-20)
11. HM Treasury, "Policy statement on reform of the Consumer Credit Act 1974" (18 May 2026), confirms scope of CCA reform. https://assets.publishing.service.gov.uk/media/6a06f7505f39105e0848a32a/HM_Treasury_-_Policy_statement_on_reform_of_the_Consumer_Credit_Act_1974.pdf (accessed 2026-08-20, via search summary)
12. UK Parliament, Financial Services and Markets Bill [HL] progress pages, First Reading 19 May 2026, Second Reading 8 June 2026, Committee Stage sessions through 8 July 2026, Report Stage expected from 7 September 2026. https://bills.parliament.uk/bills/4129 and https://www.parliament.uk/business/news/2026/june-2026/financial-services-and-markets-bills-house-of-lords-committee-stage/ (accessed 2026-08-20; bill page itself returned HTTP 403, dates corroborated via parliament.uk news pages and Addleshaw Goddard briefing)
13. HM Treasury, "A Streamlined Approach to Payment Systems Regulation: Consultation response" (21 April 2026), confirms intention to abolish PSR and fold functions into FCA, explicitly states no date yet set for the required primary legislation. https://www.gov.uk/government/consultations/a-streamlined-approach-to-payment-systems-regulation-consultation/outcome/a-streamlined-approach-to-payment-systems-regulation-consultation-response (accessed 2026-08-20)
14. Global Regulation Tomorrow / regulatory press summaries on FCA PS26/2 and PRA SS1/26, new operational incident and third-party reporting rules published March 2026, in force from 18 March 2027, and FCA's March 2026 observations on self-assessment weaknesses. https://www.regulationtomorrow.com/2026/03/fca-publishes-insights-and-observations-in-relation-to-operational-resilience/ (accessed 2026-08-20)
15. Farrer & Co / Ropes & Gray briefings on the SDR extension to portfolio managers, confirming the FCA paused the policy statement in April 2025 with no restart date announced since. https://www.farrer.co.uk/news-and-insights/fca-proposes-extension-of-the-sdr-regime-to-portfolio-managers/ and https://www.ropesgray.com/en/insights/viewpoints/102kaig/fca-pauses-sdr-extension-to-portfolio-managers-due-to-industry-concerns (accessed 2026-08-20)
16. Linklaters financial regulation briefing on the Financial Services and Markets Bill, noting industry view that firms are unlikely to feel the practical effect of PSR consolidation before 2028. https://financialregulation.linklaters.com/post/102mvcf/parliament-introduces-wide-ranging-bill-to-reform-uk-financial-services-regulatio (accessed 2026-08-20)

---