

Limited-Permission Credit Broking

PERMISSION ROUTE · APPLICATION PACK · FCA SUBMISSION SUPPORT

Prepared for

Example Retail Ltd (fictional, for illustration only)

SAMPLE



1.

Route Memo

We have confirmed the proposed permission route for Example Retail Ltd's point-of-sale finance arrangement, based on the sales journey, the proposed lender relationship and the finance product described to us.

Recommended route

Example Retail Ltd's principal business is retail, with credit broking offered only as a secondary activity to support customer purchases. On the facts supplied, a limited-permission credit-broking authorisation is the appropriate route, rather than full consumer-credit permission or an Appointed Representative arrangement.

KEY FINDINGS



Secondary activity confirmed

Credit broking supports product sales; it is not the firm's main business line.



Qualifying finance product

The proposed product carries interest and sits outside qualifying DPC, so broking permission applies.



One open item

Final lender terms and commission structure to be confirmed before submission.



Evidence list agreed

Supporting documents identified and tracked on the Evidence Checklist overleaf.

OUR VIEW

The limited-permission route matches Example Retail Ltd's actual business and finance arrangement, and keeps the application proportionate to the activity being authorised. We do not consider full consumer-credit permission necessary on the facts supplied, provided the finance offering stays secondary to the retail business and the lender relationship described in this memo does not change materially.

2.

Evidence Checklist

Tailored to the proposed products and customer journey — the documents and information needed before the application can be submitted, tracked through to FCA decision.

**Corporate documents**

Certificate of incorporation, register of persons with significant control, group structure chart.

Received

**Director & controller details**

Identification and a fit-and-proper questionnaire completed for each director and controller.

Received

**Lender/provider agreement**

Signed commercial terms with the proposed third-party finance provider, including commission basis.

Outstanding

**Customer journey & policies**

Checkout flow screenshots, finance disclosures, vulnerable-customer and complaints procedures.

Received

**Financial projections**

12-month forecast covering the broking activity and the firm's prudential resources.

In progress

**Staff training records**

Evidence that customer-facing staff are trained on the finance disclosures and eligibility criteria.

Outstanding

**Conduct risk assessment**

An assessment of conduct risk in the sales journey, including affordability and suitability checks.

In progress

3.

Business-Plan Outline

The regulatory business plan sections we prepare with you, covering the model, controls and resources behind the credit-broking activity, structured the way the FCA expects to see it.



Business model

How the finance option fits the wider retail proposition and what drives customer demand for it.



Governance

Oversight of the broking activity, outsourced functions and the senior manager accountable for it.



Financial forecasts

12-month broking volumes, commission revenue and the firm's prudential resources position.



Controls & policies

Conduct risk, complaints handling, financial promotions approval and record-keeping arrangements.

3.1 What goes in each section



Scope of the application

- Limited-permission credit broking only, matching the activity described in the Route Memo.
- No lending, debt collection or other regulated activity included in scope.
- A clear statement of what the firm will and will not do, to keep the application proportionate.



Supporting evidence

- Cross-referenced to the Evidence Checklist so each business-plan claim is supportable on submission.
- Updated as outstanding items (lender agreement, forecasts, training records) are finalised.



Financial resources and forecasts

- A 12-month volume and revenue forecast for the broking activity, stress-tested against a low-volume scenario.
- Confirmation that the firm's prudential resources meet the applicable threshold for the permission requested.
- Working capital and wind-down considerations specific to the broking activity, kept proportionate to its scale.



Governance and oversight

- The senior manager accountable for the broking activity, and how it is reported into existing governance.
- Outsourcing oversight for any function performed by the lender or a third party on the firm's behalf.

Each section above is drafted with you, reviewed against the Route Memo and the Evidence Checklist, and finalised only once the firm has confirmed the underlying facts remain accurate.

4.

Application-Pack Checklist

The forms, attachments and sign-offs tracked ahead of submission, and the record kept once the application is with the FCA, through to decision.

Forms & attachments

- Variation/new permission application form
- Regulatory business plan
- Controller and management forms
- Financial projections and resources statement
- Policies: conduct, complaints, promotions
- Lender/provider agreement (signed)

Sign-off & submission log

- Director sign-off recorded before submission
- Submission date and FCA case reference logged
- FCA information requests tracked to response
- Decision recorded against the original scope
- Post-decision actions (if any) assigned and dated

Overall assessment

This checklist is reviewed with you before submission and updated as the FCA raises questions, so the application pack stays a single source of truth from first draft to decision. Nothing is marked "submitted" until the firm has confirmed accuracy of the final pack.

1

Finalise outstanding evidence

Close the lender agreement, financial projections and training-record items on the Evidence Checklist.

2

Complete the application pack

Assemble forms, business plan and policies, cross-checked against the Route Memo scope.

3

Director sign-off

Walk the completed pack through with the accountable director before anything is sent to the FCA.

4

Submit to the FCA

Submit the application and log the case reference and submission date in the tracker.

5

Respond to FCA queries

Coordinate and track responses to any FCA information requests within the agreed scope.

6

Record the decision

Log the FCA's decision against the original scope and agree any post-decision actions.



Drafted



Submitted