User guide: Adding or amending multiple Directory Persons data

This user guide helps firms to either submit new Directory Persons data or amend existing Directory Persons information, in bulk.

From later this year, Directory Persons information will start being published on the Financial Services Register (FS Register), a public register showing details of key people working in financial services.

Directory Persons consist of:

- all Certified staff (those holding a certification function under the Senior Managers and Certification Regime (SM&CR)
- directors who are not performing Senior Manager Functions (SMFs) – both executive and non-executive
- other individuals who are sole traders or ARs (including those within ARs) where they are undertaking business with clients and require a qualification to do so

Directory Persons information to be published on the FS Register includes:

- name and any previous names
- roles with start and end dates
- activities undertaken

For customer-facing roles requiring qualification:

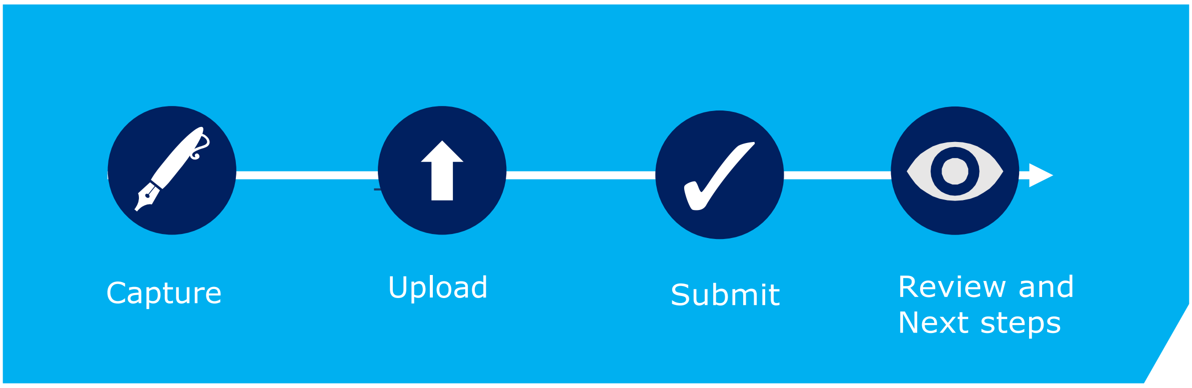
- customer engagement methods
- workplace location (where relevant)
- Memberships of professional bodies

Version: 10.0
February 2021

Table of Contents

1. Getting started

To submit your Directory Persons data successfully, you need to:



Before you start, check you are ready to begin your submission.

Connect – Make sure you have access to the Connect system. You can't submit Directory Persons data without this.

Spreadsheet – You will need to use a program that allows you to populate an Excel spreadsheet and save the file as CSV UTF-8 format.

Bulk submission of Directory Persons data – use the Multiple Add template to submit new Directory Persons data. This could be new Directory Persons, or new data about those persons, e.g. adding a new role. It cannot be used to amend previously submitted information.

Bulk amendments of Directory Persons data – use the Multiple Amend template to amend previously submitted Directory Persons information.

Latest files - please ensure you are using the latest versions of the user guide and template from the Directory Persons web page.

2. NEW...Roles, Activities and Accreditations

See FCA Handbook for more details on certification functions and list of Activities

Roles covered in Directory
[FCA CF] (1) CASS oversight function
[FCA CF] (2) Benchmark submission and administration
[FCA CF] (3) Proprietary trader
[FCA CF] (4) Significant management
[FCA CF] (5) Functions requiring qualifications
[FCA CF] (6) Manager of certification employee
[FCA CF] (7) Material risk taker
[FCA CF] (8) Client dealing
[FCA CF] (9) Algorithmic trading
[PRA CF] Significant risk taker or Material risk taker
[PRA CF] Key function holder
[PRA CF] Managing a material risk taker
Director of firm who is not a certification employee or a SMF manager
Sole trader dealing with clients for which they require qualification
Appointed representative dealing with clients for which they require qualification

Activities covered in Directory
2. Giving personal recommendations on securities which are not stakeholder pension schemes or personal pension schemes or broker funds
3. Giving personal recommendations on derivatives
4. Giving personal recommendations on retail investment products which are not broker funds
6. Giving personal recommendations on Friendly Society tax-exempt policies (other than Holloway sickness policies where the Holloway policy special application conditions are met)
7. Giving personal recommendations on long-term care insurance contracts
8. Giving personal recommendations on investments in the course of corporate finance business
9. Advising on syndicate participation at Lloyd's
9A. Advising on P2P agreements
10. Broker fund adviser
11. Pension transfer specialist
12. Giving personal recommendations on and dealing in securities which are not stakeholder pension schemes or personal pension schemes or broker funds
13. Giving personal recommendations on and dealing with derivatives
14. Managing investments
15. Operating a collective investment scheme or undertaking the activities of a trustee or depositary of a collective investment scheme
16. Safeguarding and administering investments or holding client money
17. Administrative functions in relation to managing investments
18. Administrative functions in relation to effecting or carrying out contracts of insurance which are life policies
19. Administrative functions in relation to the operation of stakeholder pension schemes
20. Advising or arranging (bringing out) regulated mortgage contracts for a non-business

Activities covered in Directory
purpose
21. Advising or arranging (bringing out) equity release transactions
21A. Designing scripted questions for execution-only sales of regulated mortgage contracts for a non-business purpose
22. Designing scripted questions for execution-only sales of equity release transactions
23. Overseeing execution-only sales on a day-to-day basis in relation to equity release transactions

Accreditations
CFA Society of the UK
The Chartered Institute for Securities and Investment (CISI)
The Chartered Banker Institute (CBI)
The Chartered Insurance Institute (CII)
The London Institute of Banking and Finance (LIBF) - formerly known as IFS

3. Multiple Amend

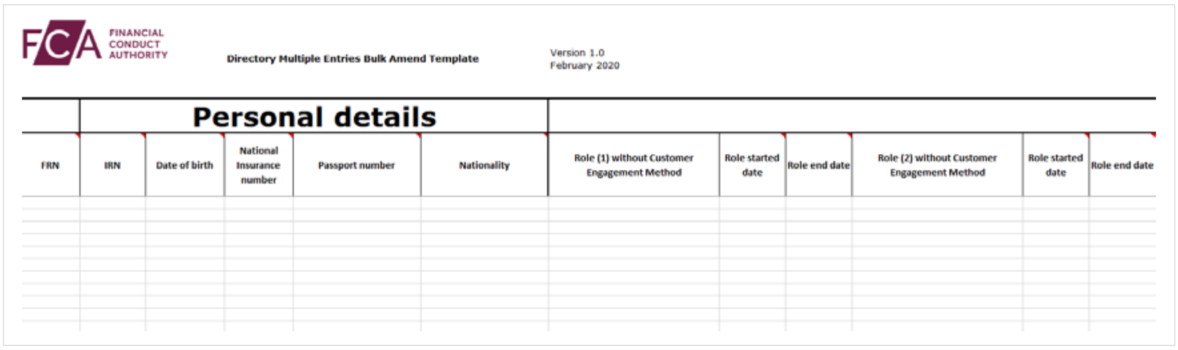
The multiple amend template allows you to amend multiple Directory Person records via a single application. You can use the Multiple Amend template to:

- end date existing roles
- update activities, accreditations, workplace location or customer engagement method
- update start date and end date for a role

Prerequisite – A firm should have added Directory Person details using either the single Directory Person notification form or the multiple add template.

Note *- Updating activities, accreditations, workplace location or customer engagement method will overwrite the existing information. Therefore, you should only provide the information that should be displayed on the FS Register going forward.*

The Multiple Amend template you need to complete looks like the illustration below. Each row represents a single Directory Person for a single legal entity. If an individual works for multiple legal entities, please submit a separate application for each entity.

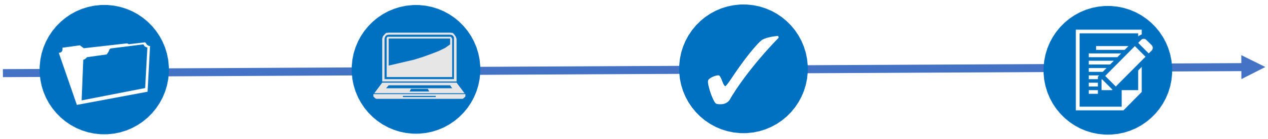

FINANCIAL CONDUCT AUTHORITY

Directory Multiple Entries Bulk Amend Template

Version 1.0
February 2020

	Personal details											
FRN	IRN	Date of birth	National Insurance number	Passport number	Nationality	Role (1) without Customer Engagement Method	Role started date	Role end date	Role (2) without Customer Engagement Method	Role started date	Role end date

Multiple add section covers:



Capture:
input your information in the Multiple Add template - be mindful of rules and guides

Upload:
The correctly completed Multiple Add template into Connect

Submit:
Submit application and check that the file was uploaded correctly

Next steps:
View application feedback file to ensure no errors occurred / amends required

To help you determine which template you should be using (Multiple Add or Multiple Amend), please refer to the following table:

Use Cases	Single Add	Single Amend	Multiple Add	Multiple Amend	Note
Add new Directory Persons	✓		✓		
Add new roles	✓	✓	✓		
Add new activities	✓	✓	✓		
Add new accreditations	✓	✓	✓		
Add new workplace location	✓	✓	✓		
Add new customer engagement method	✓	✓	✓		
End date existing roles		✓		✓	When all roles are end dated, all activities will end as well.

Use Cases	Single Add	Single Amend	Multiple Add	Multiple Amend	Note
Update name (title, first name, last name or commonly used name)	✓	✓			You can also hide previous name using single amend form
Update Passport Number	✓	✓			
Update Nationality	✓	✓			
Update National Insurance Number	✓	✓			
Remove existing activities		✓			
Remove existing accreditations		✓			
Remove existing workplace location		✓			
Update customer engagement method		✓			
Overwrite existing activities				✓	This will replace existing data with the information provided in the bulk amend spreadsheet. No change will be made if no data is provided for an attribute. E.g. – if no activities are listed in the Multiple Amend spreadsheet, then the existing activities will remain unchanged.
Overwrite existing accreditations				✓	
Overwrite existing workplace location				✓	
Overwrite existing customer engagement method				✓	
Update start-date		✓		✓	

Please see scenarios where you cannot use Multiple Amend and your available options:

When not to use Multiple	What action to take:
To update personal details such as – first name, last name or common name	Use the single amend Directory Person notification to amend personal details such as – first name, last name or common names
To remove an activity which is the only activity that an individual performs	Use the single amend Directory Person notification form to remove the only activity that an individual performs

To remove an accreditation that is the only accreditation that an individual is associated with	Use the single amend Directory Person notification form to remove the only accreditation that an individual is associated with
To remove a workplace location which is the only workplace location	Use the single amend Directory Person notification form to remove the only workplace location for an individual

Illustration of how submitting data via Multiple Amend would impact Directory Person data on the FS Register using Activities as an example:

Scenario	Activities previously submitted	Activities submitted via Multiple Amend	Activities that will be displayed on the FS Register
1.	• [FCA CF] (1) CASS oversight function • [FCA CF] (2) Benchmark submission and administration • [FCA CF] (3) Proprietary trader • [FCA CF] (4) Significant management	• [FCA CF] (1) CASS oversight function • [FCA CF] (2) Benchmark submission and administration • [FCA CF] (9) Algorithmic trading	• [FCA CF] (1) CASS oversight function • [FCA CF] (2) Benchmark submission and administration • [FCA CF] (9) Algorithmic trading
2.	• [FCA CF] (1) CASS oversight function • [FCA CF] (2) Benchmark submission and administration • [FCA CF] (3) Proprietary trader • [FCA CF] (4) Significant management	• [FCA CF] (4) Significant management	• [FCA CF] (4) Significant management
3.	• FCA CF] (1) CASS oversight function • [FCA CF] (2) Benchmark submission and administration • [FCA CF] (3) Proprietary trader • [FCA CF] (4) Significant management	• [Blank for activities]	• [FCA CF] (1) CASS oversight function • [FCA CF] (2) Benchmark submission and administration • [FCA CF] (3) Proprietary trader • [FCA CF] (4) Significant management Note – if no activities/ accreditations/workplace locations are provided then no changes will be made to the record.

Note – The same logic applies to accreditations and workplace location.

4. Capture

What do you need to do?

- Complete the required fields on the template.
- Be aware of the required format for each field.
- Be aware of the rules relating to roles, activities, customer engagement methods and workplace location.
- Be aware that if you are end dating all the active roles of an individual, then all the activities, workplace locations and accreditations associated previously with this individual will also be removed.

Important information you need to know when completing the template:

- The header cell of each column contains help text (if needed). Hover over header cells to display the text.
- Do not remove or edit the top 3 rows.
- Do not add formatting to the spreadsheet (e.g. cell borders) as this may corrupt the file when it is saved to CSV UTF-8.
- Some cells contain validations. Do not change them or your submission is likely to fail.
- Do not use commas as they will cause your submission to fail.
- Do not leave blank rows. For example, do not fill in row 10 and 12 but leave row 11 blank. If you do any data after row 10 will not be processed.

Hints & Tips:

Where an individual has had a gap in service:

1. First submit the historical role using single add or multiple add.
2. Check the Application feedback file to confirm that the historical role submission has been processed
3. Then add the current role.

Warning! If you submit current role first and then historical message later, you will get an error message

Use the formats and rules in the following table when completing the multiple amend template. Please follow these carefully – if there are errors your file will not be processed.

	Data Field	**Format**	**Required?**
Firm Details	FRN	Numeric – 6 to 7 characters	
Personal Details	IRN	Alphanumeric – 8 characters	
	Date of birth	Numeric – (dd/mm/yyyy)	
	National Insurance number^1	Alphanumeric – 2 Alpha followed by 6 numeric followed by 1 Alpha	
	Passport number^2	Free Text field	
	Nationality	Predefined drop-down list	Mandatory when providing passport number
Directory Person role details	Relevant roles currently held	Predefined drop-down list	Mandatory when amending start date, end date or customer engagement method (if applicable) for an existing role
	Date started role	Numeric – (dd/mm/yyyy) - Can be up to 3 months in the future	Either start, end date or customer engagement method (if applicable) is mandatory when relevant role is populated
	Role end date	Numeric – (dd/mm/yyyy) -	Either start, end date or customer engagement method (if applicable) is mandatory when relevant role is populated
	Activities which the Directory Person carries out	Predefined drop-down list	
	Customer engagement method(s)	Predefined drop-down list – More than one can be selected	Either start, end date or customer engagement method (if applicable) is mandatory when relevant role is populated
	Workplace location(s)^3	Alphanumeric – 8 characters – Up to 5 postcodes can be provided	
	Relevant Accredited Body the Directory Person is a Member of for customer engagement roles requiring qualification only	Predefined drop-down list	
Key			
	Always required		
	Where applicable		

1. *National Insurance (NI) number: It is mandatory to provide a NI number if the Directory Person has one (see SUP 16 Annex 47AR (4-5) & SUP 16 Annex 47BG (2)).*
2. *Passport number: provide the passport number and nationality if the Directory Person does not have an NI number.*
3. *The workplace location field may be left blank if a firm believes that making a Directory Person's workplace location public would put them at risk.*

Saving your file

Note: To ensure your file is processed promptly, please don't exceed a file size of 5MB (megabytes). The number of rows you can populate will depend on how many columns are used. For example:

- 100% (96) columns populated = approx. 1500 rows
- 50% (48) columns populated = approx. 2000 rows
- 25% (24) of columns populated = approx. 2500 rows

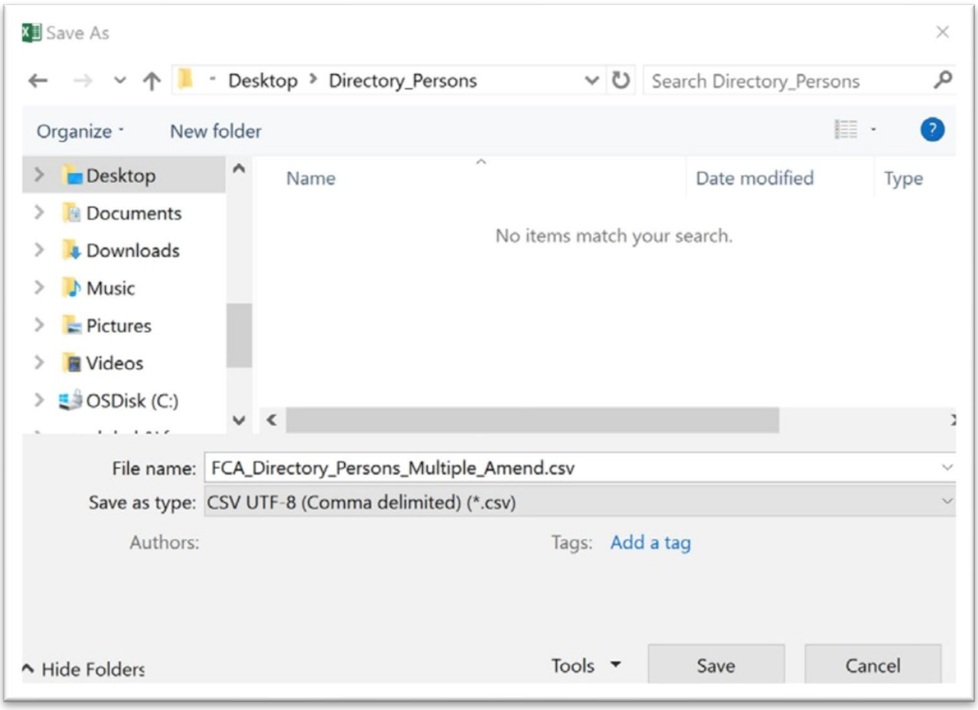
If you need to submit more information than this, you can do so by submitting another application and uploading a file with the remaining information.

When you have completed the template with all the information in appropriate fields, **save the file in the .csv (comma separated values)** format, and **not** as .xls (Excel spreadsheet). Do not save it as a CSV UTF-8 until you are ready to submit, as doing so will remove the template formatting.

When saving the file, ensure you are on the form that contains the information you have populated, as the CSV UTF-8 format removes all other tabs.

The name of your file should be:
'FCA_Directory_Persons_Multiple_Amend.csv' and saved on a local drive.
Do not use any spaces or special characters in the file name.

When you have saved the file, you are ready to upload your file(s) to Connect



Saving as a .csv file

5. Upload

To upload your completed Multiple Amend template:

Note: All screenshots provided are for illustration purposes only. Actual content and design may differ on Connect.

1. Log into your Connect account.
2. Click on 'Start an Application' – this button is on the left-hand side of the screen.

+ Start an Application

3. Select the section 'Directory Persons'.

DIRECTORY PERSONS

4. To amend Directory Person(s), select 'Start Application'.

Amend and/or End Date Directory Person(s)

- update the personal information held for Directory Person's
- update information in relation to the Directory Person's current roles and/or activities
- update information when the Directory Person's ceases to perform specific roles

Start Application

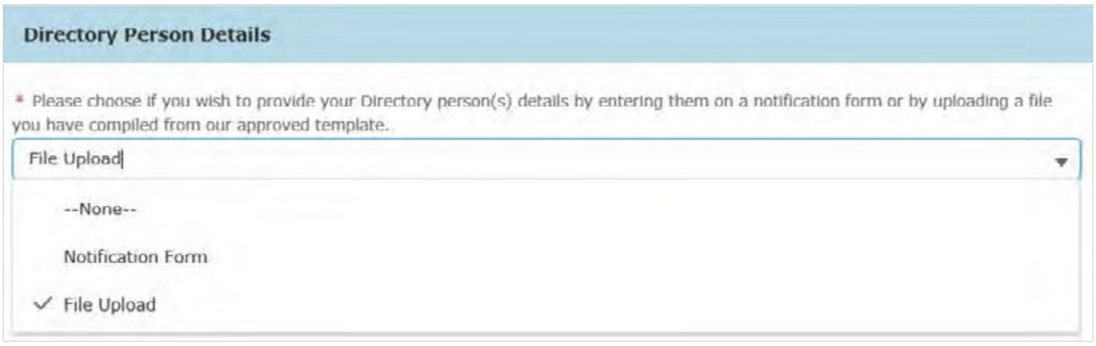
5. Complete the 'Applicant Details' section. The 'Applicant' is the person submitting the notification. This is not for the details of the Directory Person.

FORM	STATUS	
Applicant Details	Not Started	Start
Directory Person Details	Not Started	Start
Declaration	Not Started	Start

6. When you have completed the 'Applicant Details' section, select the 'Directory Person Details' section.

FORM	STATUS	
Applicant Details	Complete	Edit
Directory Person Details	Not Started	Start
Declaration	Not Started	Start

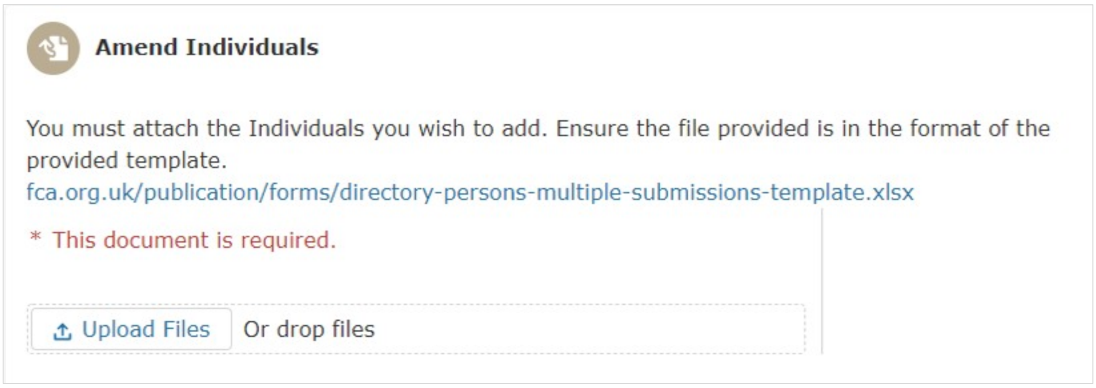
7. Select the 'File Upload' option.



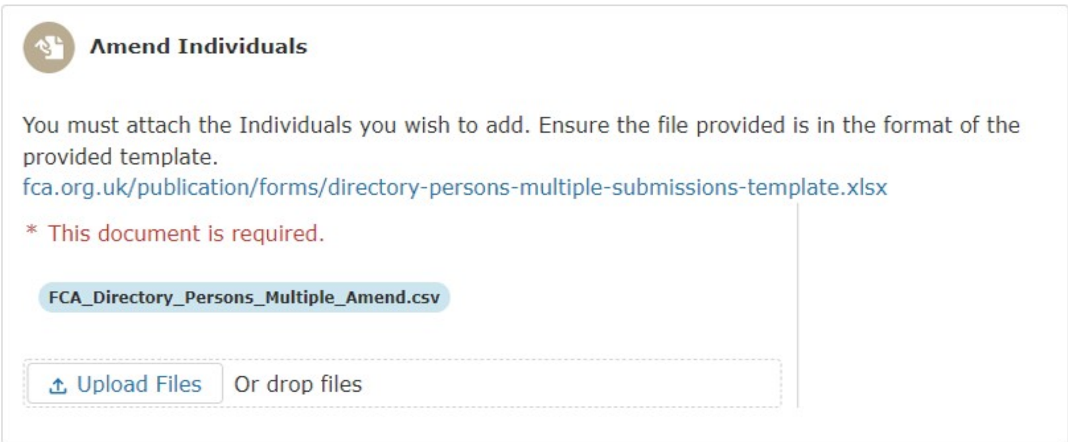
Please note:
you can complete these steps before starting to populate the template.

When you select 'File Upload', you can download the template via a link.

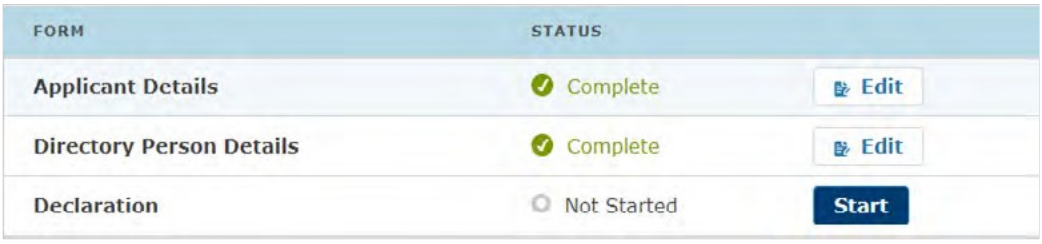
8. Upload your file(s) or drop them in the box shown below.



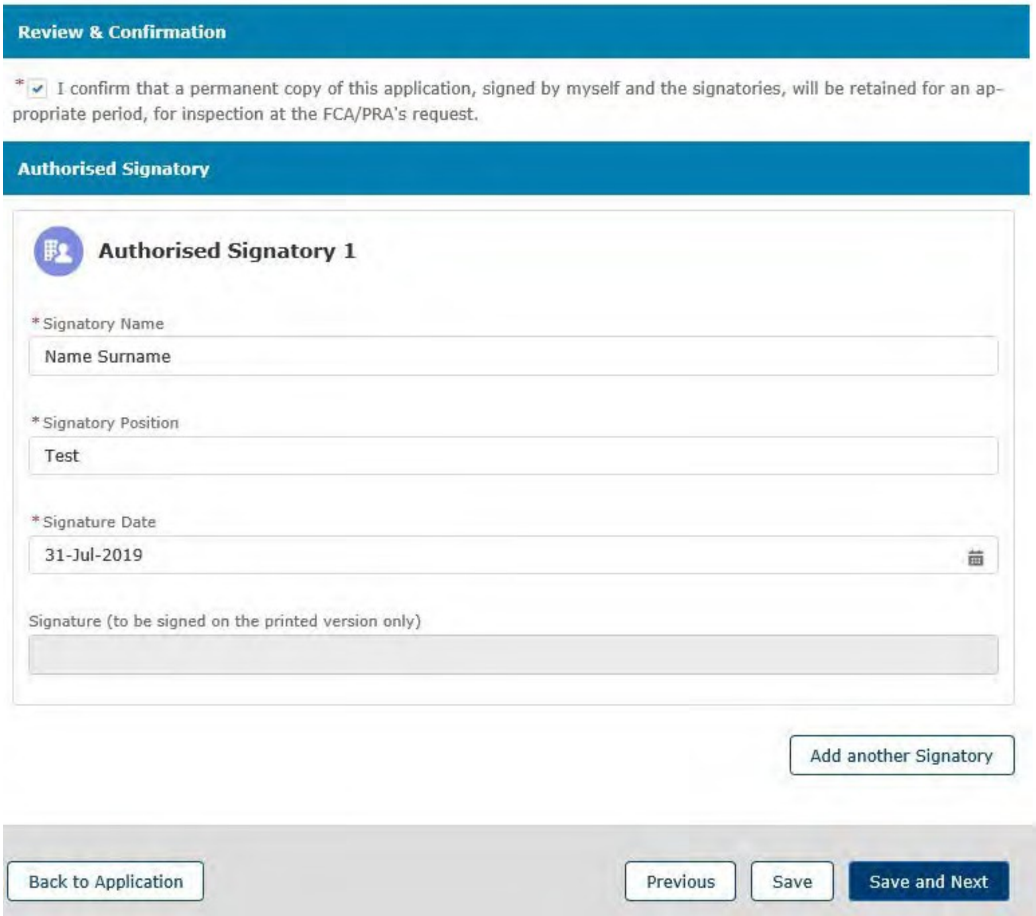
9. The file(s) you uploaded will appear on the screen. Select 'Save and Next'.



10. When you have completed this, the 'Directory Person Details' will appear as 'Complete'. Next, click on the Start button for 'Declaration'.



11. Read and complete the declaration page. Then click on 'Save and Next'.



It is not necessary to print, sign and retain your application. You can view your application on Connect. However, please check the box to continue.

6. Submit

What you need to do:

- Submit the application.
- Be aware of what to do if the file contains errors or if we can’t accept some of the information you have provided.
- Check the file has been processed successfully.

When the file you wish to submit has been successfully uploaded, you will need to submit the application so we can start processing the information and publish it on the FS Register.

1. You are now ready to submit. Click on ‘Submit Application’.

FORM	STATUS	
Applicant Details	Complete	View
Directory Person Details	Complete	View
Declaration	Complete	View

2. You will see the following information box. Click ‘Submit’ to proceed.

Confirm Submit Application

Once the submission of your application/notification has completed, you will remain on the Application Home Page. Here you will be able to select each section of the submitted application/notification and print the hard copies. The application/notification is to be signed by designated signatories and kept for your records. Please use the Application Reference Number in any correspondence.

Cancel | Submit

3. On the next screen, you can choose to view the information you submitted either by viewing each section separately or by downloading a pdf version of your submission. You won’t be able to see the content of your multiple amend file, but you will see the name of the file you submitted, and your application reference number.

4. We now have your file and you can log out. We will email you further information about processing your data.

FORM	STATUS	
Applicant Details	Complete	View
Directory Person Details	Complete	View
Declaration	Complete	View

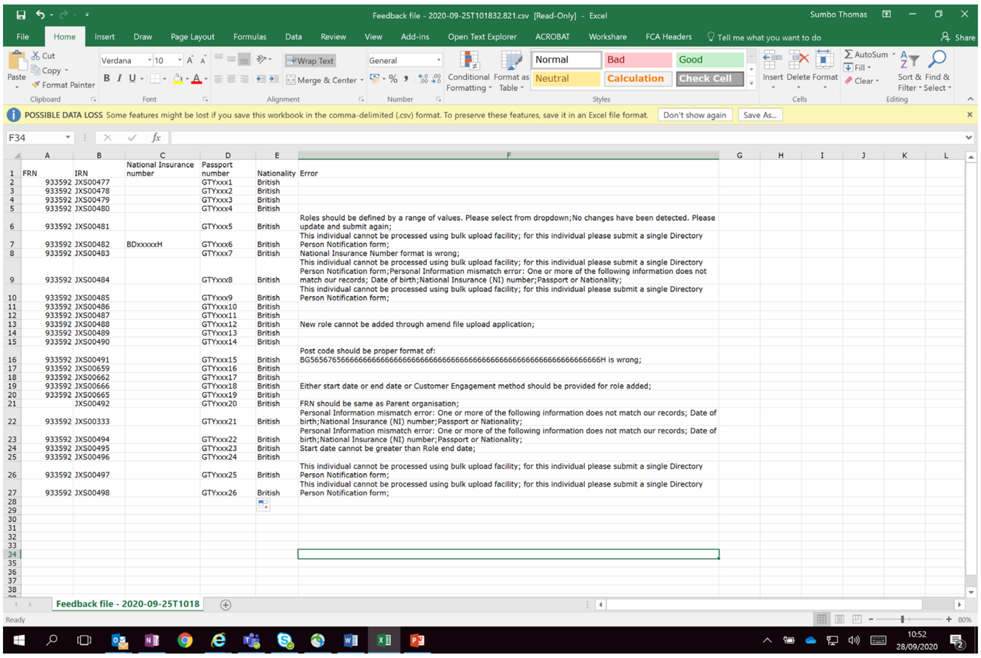
7. Review and Next steps

When you have uploaded and submitted the Multiple Amend form, our systems will undertake several checks on the data to ensure it is ready to publish on the FS Register.

We will check your data and create a feedback file (Feedback.csv). We will email you to let you know when this available on Connect. You will be able to find the feedback file under 'Directory Person Detail' section of the submitted application. The feedback file will contain all the records you have submitted. For individual row(s) which have been processed without error, there will be no details in the error column or else you will see details of the issue in that column.

Please resolve the identified issues and submit a new notification on Connect, including the corrected records only. We will process this and contact you with the outcome.

The checks happen in a stage-by-stage process, but you will receive only 1 email confirming your application has been processed. If there aren't any errors in the data, we aim to publish the information within 24 hours. (From later this year for banks and insurers and from end of December 2020 for all other firms).



Sample screenshot of a feedback file

Access your feedback file from the Directory Person detail section: The path is as follows, select - >Application Reference Number -> View Application -> Directory Person Details -> feedback.csv.

8. Support

Contact us
0300 500 0597

Policy statement 19/7:
finalising the Directory

Directory Persons webpage

Directory persons data collection: Q&A

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12 Endeavour Square London
E20 1JN Telephone: +44
(0)20 7066 1000 Website:
www.fca.org.uk