



BONUS TOOLKIT · CP26/22 BROKER CHECKLIST

# CP26/22 Broker Checklist

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A working checklist for insurance brokers to audit-map the FCA's CP26/22 consultation against your compliance file before the 4 September 2026 deadline.

**Chris Matthews**

AI Strategist, Speaker & Author

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Making AI practical for business



# How this worksheet works

A working document for insurance intermediaries and the compliance leads who hold their file. Run it now, while CP26/22 is still open for consultation, and again when the FCA publishes its final rules.

## Why this exists

The FCA published CP26/22, Simplifying the insurance rules, on 29 June 2026. It is part of a wider push to cut complexity out of the insurance conduct handbook. For brokers it touches three things that already sit in your compliance folder: your professional indemnity insurance minimums, your customer disclosure pack, and your record-keeping in ICOBS 6B.

The headline change is denominational, not substantive. The FCA proposes moving minimum PII levels for insurance intermediaries from euros to pounds at a fixed conversion rate of 1.1674 euros to the pound, without reviewing the underlying minimum cover. The proposed sterling figures are £1,110,000 per claim and £1,650,000 in aggregate, set out in MIPRU 3.2.7R. Your required cover does not rise or fall. The number on your certificate and in your internal record changes.

The consultation closes on 4 September 2026. Firms that respond early shape what simplified means in practice. Firms that ignore it implement whatever lands. This worksheet gives you the three jobs to do now: read the right pages, ignore the noise, and update your compliance file so you are not caught flat-footed when the final policy lands.

## How to use it

- Run it with your compliance lead and your PI broker in the room. One owns the file, the other owns the cover.
- Start at Section 1 and work in order. Each section feeds the next.
- Be specific. A reference to ICOBS 6B.2.57R beats a note that says review records.
- Where you cannot answer, write “unknown”. Unknown is itself a finding.

## Key terms

The terms used through this worksheet, in the order they matter.

Term	Stands for	What it means here
CP26/22	Consultation Paper 26/22	The FCA consultation, Simplifying the insurance rules, published 29 June 2026. Open for response until 4 September 2026.
PII	Professional indemnity insurance	The cover brokers must hold. Minimum levels are set in MIPRU 3.2.7R. CP26/22 proposes redenominating them in pounds.
ICOBS	Insurance Conduct of Business Sourcebook	The FCA handbook module covering how insurers and intermediaries deal with customers. CP26/22 trims disclosure rules here.



Term	Stands for	What it means here
MIPRU	Prudential Sourcebook for Mortgage and Insurance Intermediaries	Where the PII minimum limits live, at 3.2.7R.
Durable medium	n/a	A way of providing information a customer can store and repeat. CP26/22 keeps the requirement even as it allows more digital channels.



## 01

## SECTION 1

# What to read

CP26/22 is a long paper. Most of it does not apply to a broking firm in one sitting. This section is your reading map: what to open, what to skim, what to skip for now.

#	Part of CP26/22	Why it matters to you	Read / Skim / Skip

Where to start:

- The chapter on PII (MIPRU 3.2.7R) is your first stop. It carries the new sterling figures.
- The ICOBS disclosure chapters cover your customer documents and digital channel flexibility.
- The ICOBS 6B.2.57R correction is one line, but it touches your record-keeping.

A note. The FCA is explicit that the PII change does not review the underlying minimum levels. Do not treat the new pound figures as a change to your required cover. They are a redenomination.



## SECTION 2

## 02

# Your PI certificate and record of cover

This is the core job. Pull your current PI certificate and your internal record of cover and lay them next to the proposed MIPRU 3.2.7R figures. You are checking whether your policy limits, as written, will read correctly against the new sterling minimums.

## The proposed sterling minimums (MIPRU 3.2.7R)

Limit	Current (euros)	Proposed (sterling)	Conversion
Per claim	EUR 1,300,380	GBP 1,110,000	1.1674
Aggregate	EUR 1,924,560	GBP 1,650,000	1.1674

## Your cover, mapped

PII element	Your current figure	Meets proposed minimum? (Y/N)	Action

## What each element means

**Per claim limit.** The most your insurer will pay for a single claim. Proposed sterling minimum is GBP 1,110,000.

**Aggregate limit.** The most your insurer will pay across all claims in the period. Proposed sterling minimum is GBP 1,650,000.

**Currency denomination.** If your policy is written in pounds already, the change is administrative. If it is in euros or another currency, MIPRU 3.2.8R requires equivalent limits.



## 03

## SECTION 3

# Your customer disclosure pack

CP26/22 proposes removing duplicative disclosure requirements across ICOBS and giving firms more flexibility on how information is provided, including more use of digital channels. The durable medium requirement stays. This section audits your customer disclosure pack against those changes.

Disclosure item	Where it lives today	Keep / Trim / Move digital	Owner

**Duplicative disclosure.** Information you give customers in more than one place or form. CP26/22 targets these for removal.

**Digital channel flexibility.** New freedom to deliver disclosures digitally, as long as the durable medium test is met.

**Durable medium.** The customer must be able to store and repeat the information. Paper on request stays a requirement.



## 04

## SECTION 4

## Your record-keeping (ICOBS 6B)

CP26/22 makes a small correction to record-keeping in ICOBS 6B.2.57R. It removes the reference to the person responsible for the General Insurance Pricing Attestation, which was decommissioned under Handbook Notice 132. It is a tidy-up, not a new obligation, but your records procedure should not still name a role that no longer exists.

Record-keeping item	Current wording / owner	CP26/22 change	Action

A note. Check whether your internal procedures or templates still reference the GI Pricing Attestation or its responsible person. If they do, that reference is now stale.



## 05

## SECTION 5

# Respond before the deadline

The consultation closes on 4 September 2026. Firms that respond shape the final rules. You do not need a formal submission to have a view. Decide what you will feed back, who will draft it, and by when.

Issue	Your position	Who drafts the response	Target date

What to consider:

- The PII redenomination: do the sterling figures and the 1.1674 rate work for your firm?
- Disclosure removal: which duplicative requirements are you glad to lose, which do you want to keep?
- Digital channels: what would unblock for you that the durable medium test currently constrains?



## 06

## SECTION 6

# Action log

Every gap and action from the sections above lands here. One owner, one date, one status per row.

#	Gap / action	Owner	Target date	Status



## 07

## SECTION 7

# Self-score

Score each pillar honestly out of 10. The first run is usually lower than expected. That is the point.

Pillar	Score 0 to 10	Evidence	Top priority to fix

Total: \_\_\_ / 50

- 40 to 50: your compliance file is ready for the final rules.
- 25 to 39: you have started, keep going before September.
- Below 25: this is the work for the next 90 days.



# 08

## SECTION 8

# The next 90 days

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A working sequence from now to the consultation deadline and beyond. Treat it as a rhythm, not a project plan.

### Days 1 to 14

- Read the CP26/22 PII and disclosure chapters. Pull your PI certificate and disclosure pack.
- Map your current PII limits against the proposed sterling minimums.

### Days 15 to 45

- Audit your disclosure pack for duplicative requirements and digital channel opportunities.
- Check your records procedures for stale references to the GI Pricing Attestation.

### Days 46 to 75

- Draft your consultation response. Agree your position on the redenomination and the disclosure changes.
- Update your compliance file with the working changes.

### Days 76 to 90

- Submit your response before 4 September 2026.
- Brief your board and PI broker on the expected final rules.



## ABOUT THIS WORKSHEET

# About this worksheet

This worksheet maps the FCA's CP26/22 consultation onto your compliance file. It covers the three areas that touch brokers today: the PII minimum redenomination in MIPRU 3.2.7R, the disclosure changes in ICOBS, and the record-keeping correction in ICOBS 6B.2.57R. It helps you read the right pages, ignore the noise, and update your file before the 4 September 2026 deadline.

Reviewed before every compliance cycle. Refreshed whenever the FCA publishes a new consultation or final rules.

If you want a working session to run this alongside your compliance lead, book a strategy call.

Prepared for insurance brokers and intermediaries. Not legal or regulatory advice. The CP26/22 figures and dates are drawn from the FCA consultation paper published 29 June 2026, open for response until 4 September 2026. Verify the current position for your specific situation before you rely on it. Use this alongside your own compliance and legal advisers. Source: FCA, CP26/22: Simplifying the insurance rules, [fca.org.uk/publication/consultation/cp26-22.pdf](https://www.fca.org.uk/publication/consultation/cp26-22.pdf).