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AFB Practice Roundtable

Changes to Transaction Reporting in the UK - Key Regulatory Expectations

23 September 2026

Association of Foreign Banks (AFB)

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AFB/Kroll Roundtable on MiFIR Transaction Reporting

Final Rules Published : FCA PS26/15 for UK Transaction reporting.

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Markets in Financial Instruments Directive / Regulation (MiFID / MiFIR): How We Got Here

2007	MiFID I	Established in 2004 and effective 2007. This was the foundational framework to increase transparency, competition and investor protection across the EU's financial markets.
2018	Reform Package	The European Commission released MiFID II (Directive) and MiFIR (Regulation). The proposal for revisions were in 2011, texts published in 2014, and it became effective in 2018. These were aimed at addressing weaknesses exposed during the 2008 financial crisis. From a MiFIR transaction reporting perspective – extended scope to buy side MiFID investment firms, instrument scope extended and increase in number of fields.
2020	Post Brexit	The UK on-shored MiFID II/MiFIR into domestic law after 31 December 2020.
2024	Amendments and FCA Discussion DP 24/2	EU progressed with a MiFID II/MiFIR review in 2024. Since Brexit, the UK has run its own Wholesale Markets Review (WMR) and broader Edinburgh/Smarter Regulatory Framework reforms. In November 2024, the FCA initiated DP 24/2; 41 questions on scope (increase and decrease), changes to existing fields, additional new fields/values and other areas for discussion.
2025	FCA Consultation CP25/32	This was the result of the above Discussion Paper. The objective is to improve and streamline the on-shored UK MiFIR transaction reporting regime.
2026	Final FCA Policy Statement PS26/15 Published	Following the feedback received on CP25/32, the FCA published PS26/15 setting out the final rules and implementation approach for changes to the UK MiFIR Transaction reporting regime. The Policy statement confirms amendments to reporting fields, reportable instrument scope, data standards and reporting requirements with an objective of improving the data quality.

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In Review

Final FCA Policy Statement PS26/15 Improving the UK transaction reporting regime

Changes to Scope

FX Derivatives excluded from scope

FX derivatives (options, futures, swaps) removed from transaction reporting scope reducing compliance cost for over 400 UK Firms.

Conditional single sided reporting

Introduction of a new CSSR framework to streamline reporting arrangements and replacing existing transmission mechanism.

Fewer reporting fields

Transaction reporting Data fields reduced from 65 to 52, simplifying reporting requirements and data submissions.

Shorter back reporting period

Default Back reporting period has been reduced from 5 years to 3 years, lowering report resubmissions by approximately by one-third.

EU-only venue instruments excluded

Reporting obligation removed for approximately 7 million instruments that are only tradeable on EU trading venues.

Corporate actions exemption

Most of the corporate actions exempted from transaction reporting obligations.

Changes to Fields

■ Retained ■ Renamed ■ Removed

FIELD GROUP	RETAINED / RENUMBERED	CHANGED / RENAMED	REMOVED
Initial **1–6**	1. Report Status 2. Transaction Reference Number 3. Trading venue transaction ID code 4. Executing entity ID code 6. Submitting entity identification code	5. Investment Firm covered by Directive 2014/65/EU → Executing entity is a transaction reporting firm	
Buyer **7–15**	7. Buyer Identification code 9. Buyer – first name(s) 10. Buyer – surname (s) 11. Buyer – date of birth 12. Buyer decision maker code 13. Buy decision maker – First name(s) 14. Buy decision maker – Surname(s) 15. Buy decision maker – date of birth	8. Country of the branch for the buyer → Client Indicator for the Buyer	
Seller **16–24**	16. Seller Identification code 18. Seller – first name(s) 19. Seller – surname (s) 20. Seller – date of birth 21. Seller decision maker code 22. Sell decision maker – First name(s) 23. Sell decision maker – Surname(s) 24. Sell decision maker – date of birth	17. Country of the branch for the seller → Client Indicator for the Seller	
Transmission **25–26**		25. Transmitting firm identification code for the buyer → Sending firm identification code for the buyer 26. Transmitting firm identification code for the seller → Sending firm identification code for the seller	25. Transmission of order indicator
Transaction **27–39**	27. Trading date time 28. Trading capacity 29. Quantity 30. Quantity currency 31. Price 32. Price Currency 33. Net amount 34. Venue 35. Up-front payment 36. Up-front payment currency	37. Complex trade component id → Package Identifier 38. Package Transaction Price 39. Package Transaction Currency	32. Derivative notional increase/decrease 37. Country of the branch membership
Instrument **40–50**	40. Instrument identification code 41. Instrument full name 42. Instrument classification 43. Notional currency 1 44. Price multiplier 45. Underlying instrument code 46. Underlying index name 47. Term of the underlying index 48. Strike price 49. Strike price currency 50. Expiry date		45. National currency 2 50. Option type 53. Option exercise style 54. Maturity date 56. Delivery type
Trader / algorithms / waivers / indicators **51–52**	51. Investment decision within firm 52. Execution within firm		58. Country of the branch responsible for the person making the investment decision 60. Country of the branch supervising the person responsible for the execution 61. Waiver indicator * 62. Short selling indicator * 63. OTC post trade indicator * 64. Commodity derivative indicator * 65. Securities financing transaction indicator *

Conditional Single Sided Reporting

Widening Use

- Wider use of Conditional Single sided reporting.
- Reduces Duplicate transaction reporting.
- Applies only to UK MiFID investment firms/brokers.
- Maintains FCA Supervisory oversight.

Extending Use

- No longer restricted to firms receiving /Transmitting orders.
- Extended to additional trading capacities (Including DEAL and MTCH).
- Supports broader market participation in CSSR arrangements.

Removal of Fields to Streamline Requirements

Removal to transmit information that would already be known to the firm submitting the transaction report:

- Instrument ID.
- Buy/ Sell indicator.
- Price/ Quantity.
- General field reduction.

Single Sided Reporting Fields

Data points to be provided:

- Client designation and details.
- Decision maker designation and details (if under power of representation).
- Code identifying the transmitting firm.
- Trading capacity of the transaction.

RATIONALE

Reduce operational burden.

Protect sensitive trader / algorithm data.

Retain key client identifiers for necessary FCA oversight.

Back Reporting

Back Reporting Period Reduced From 5 Years To 3 Years

- Except for “serious reporting failing” which may require 5 years.
- Record Keeping requirements will continue to be 5 years (COBS 11 and SYSC 9).

Volumes, Firms & Costs

- Reducing the back-reporting window is project to cut affected report resubmissions by one-third.
- FCA estimates annual industry costs savings of approximately £11.9m per year.

Further Clarity / Industry Best Practices

- Further Guidance to be incorporated within the Transaction Reporting User pack TRUP
- Materiality thresholds for submitting breach notifications under Article 15 (2) of RTS 22 - FCA Market Watch 81 and 82 – no prescriptive guidance
- Field specific – All remaining fields should be treated with equal importance.

FCA Supervisory Approach (PS26/15)

- Flexible supervisory approach from 3 August 2026 - 3 April 2028.
- Scope, Instruments and Fields.
- Default Back-reporting expectation reduced immediately from 5 years to 3 years. FCA may still require up to 5 years of data for serious reporting failings.
- Validation rules relaxed to support early adoption.
- Firms are expected to maintain governance, controls, data lineage and incident management frameworks.

FCA Supervisory Approach (PS26/15)

Implementation Reliefs – Scope & Instrument Reporting

Reporting Scope Reliefs

EU-only Financial Instruments-

- FCA will not take action where firms do not report instruments traded only on EU venues.

FX Derivatives -

- Relief applies where FX products are no longer subject to UK transaction reporting obligations.

Corporate Event Activity -

- Existing expectations remain for IPOs, secondary offerings, placings and debt issuances.

Key FCA Clarifications

Derivatives based on Indices

- No action for over-reporting where the underlying is an index and none of the constituent instruments are reportable.

Derivatives based on Baskets

- No action where underlying basket constituents are not in FCA FIRDS, provided at least one underlying instrument is recorded in FCA FIRDS.

Why it matters

- Intended to reduce implementation risk and avoid unnecessary remediation during transition.

FCA Supervisory Approach (PS26/15)

Field-Level Reporting & Validation Flexibility

Fields with Temporary Relief

- **Transmission Indicator** – Identifies whether a transaction report is submitted directly or via a transmitting entity.
- **Swap Tags** – Distinguishes swap products for classification and supervisory monitoring.
- **Derivative Notional (Increase/Decrease)** – Captures adjustments to a contract's economic exposure.
- **Option Type & Exercise Style** – Specifies the option structure and exercise provisions.
- **Delivery Type** – Indicates whether settlement occurs through cash or physical delivery.
- **Maturity Date** – Records the contractual end date of the instrument.
- **Notional Currency 2** – Captures the secondary currency for multi-currency products.
- **RTS 22 Indicator Fields** – Supports regulatory categorisation and reporting consistency.

Validation Flexibility

- Selected validation rules temporarily relaxed to facilitate implementation ((e.g., CON-251, 452, 473, 500, 530,540).

Additional FCA Expectations

Branch & Country Fields

- FCA expects firms to continue reporting these fields where data is available but will not take action against firms who do not report in line with the requirement during the implementation period.
- Covers branch country, branch membership, investment decision branch and execution branch information.

Other Clarifications

- Firms may apply FCA guidance when identifying trusts (i.e. identify LEI rather than beneficiary)
- Relief applies to certain IDM/EDM fields populated with national identifiers.
- Algorithmic decision and execution fields remain mandatory.

Note: The FCA may request further information where material reporting concerns are identified.

Preparing for the 2028 UK Transaction report Reform

How should firms prepare for the FCA's final transaction reporting reforms under PS26/15 ?

1. Assess Impact of the New UK Regime

- Review PS26/15 Final rules and guidance.
- Review business and trading model. Identify business lines impacted by FX Derivatives removal, EU-only instrument de-scoping, reduced reporting obligations.
- Engage with Industry working groups and regulators.

2. Perform gap analysis

- Conduct field mapping exercise.
- Identify impacts from reduction of fields(65-52).
- Map trading scenarios against revised requirements.
- Assess implications of CSSR replacing current transmission arrangements.
- Review reporting logic, controls and exception management.

3. Identify resource and prepare project plan

- Budget for adequate resource. Are external vendors required?
- Engage other teams i.e. IT, Operations, Compliance and front office teams.
- Plan around other internal/external projects.
- Establish or make use of existing working groups to track change.
- Co-ordinate with ARMs and vendors regarding development plans and system UAT testing.

4. Review Data and reporting controls

- Cleanse Static and reference data.
- Review FCA FIRDs sourcing and instrument identification processes.
- Assess impact of revised validation requirements.
- Address existing regulatory reporting defects and backlogs.

5. Review existing and design new reporting framework

- Redesign transaction reporting framework.
- Update policies, procedures and governance controls.
- Build testing strategy and implementation roadmap to include scenarios testing and assessing the accuracy and completeness of transactions and fields.
- Plan for April 2028 go-live while maintaining BAU reporting obligations.

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