FCA MATERIAL THIRD-PARTY REPORTING

A Field-to-Evidence View

Why the difficult part may be evidence compilation, reconciliation and accountable approval - not simply contract extraction.

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Executive finding

A working map of the 53 reporting fields in FCA FG26/4 suggests that only 6 are typically direct facts from an executed contract. The other 47 require confirmation, non-contract evidence, master-data lookup or controlled system values before they can be treated as final.

6	12	28	4	3
DIRECT FROM CONTRACT	CONTRACT CANDIDATE; CONFIRM	NOT FROM CONTRACT	MASTER-DATA LOOKUP	SYSTEM / PRE-POPULATED

Regulatory context. From 18 March 2027, in-scope firms must notify the FCA when entering into a material third-party arrangement or significantly changing an existing one, and submit an annual register of material arrangements.[1]

The working question. What evidence is needed to complete one reliable record, where does that evidence sit, and which values still require an accountable human decision?

Scope of this note

This is an independent field-mapping exercise based on the official FCA guidance and templates. It is intended to support practitioner discussion and product discovery; it does not interpret the rules for any particular firm.

SECTION 1: WHAT THE NEW REGIME ASKS FIRMS TO DO

A structured output with an early decision point

The regime covers material outsourcing and material non-outsourcing arrangements. Materiality is assessed case by case: firms remain responsible for deciding whether disruption or failure could cause intolerable client harm, threaten the UK financial system, or undermine the firm's ability to meet regulatory obligations.[2]

18 MAR 2026	12 MONTHS	18 MAR 2027	90 DAYS
Final rules and guidance published	Implementation and preparation period	New rules come into force	Expected annual register submission window

Notifications are expected early. The FCA says a firm should submit a notification before making internal or external commitments, sufficiently early to allow engagement before it becomes contractually or operationally committed.[2]

Four completion rules shape the evidence workflow

01 Complete required and, where relevant, required-conditional fields.	**02** Use the prescribed dropdowns and taxonomy values when available.
03 Enter one value per field; where multiple answers apply, use multiple rows.	**04** Run the official workbook Checks tab before submission to identify format or completeness failures.

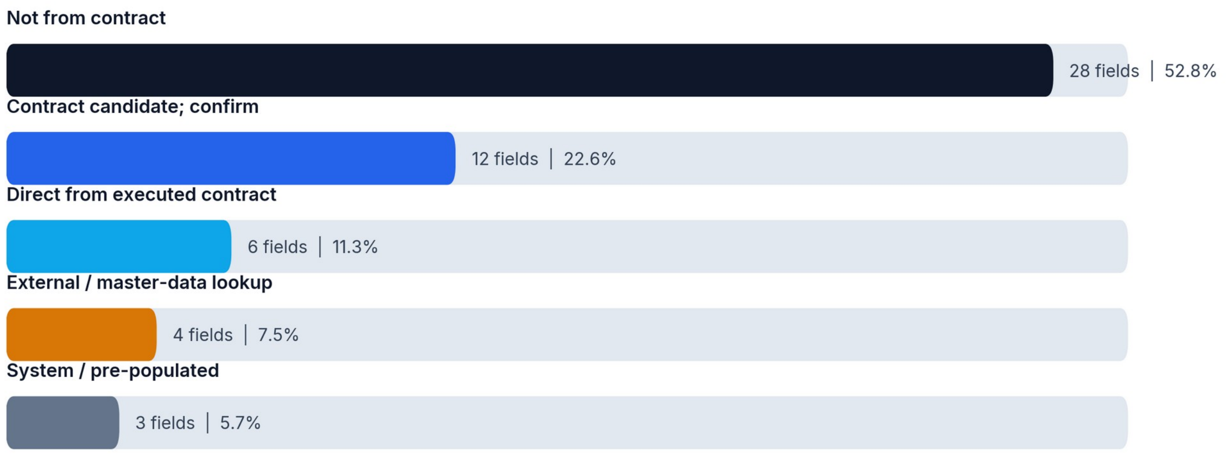
These format rules are important, but they do not identify where the facts come from, whether they are current, or who is authorised to confirm them. That is the practical field-to-evidence problem.[2]

Implication
The official spreadsheet is the final reporting artefact. It is not, by itself, the operating process needed to assemble, challenge and approve the underlying evidence.

SECTION 2: WORKING FIELD-TO-EVIDENCE MAP

Where the 53 fields are likely to come from

Each field was mapped to a likely source class, source document or system, internal owner, human-confirmation requirement, evidence artefact, missing-data question and validation condition. The categories below are a Docoply research classification, not FCA terminology.



Docoply working classification of the 53 fields listed in FCA FG26/4. This is not an FCA categorisation.

Five evidence domains appear repeatedly

Evidence domain	Fields	Typical sources
Submission and firm	**7 fields**	FCA register and group master data; submission controls
Contract and provider	**14 fields**	Executed agreements, vendor inventory, legal entity and service data
Materiality and resilience	**15 fields**	Materiality assessment, business-service mapping, BIA and impact tolerances
Risk, assurance and governance	**14 fields**	Due diligence, audit results, compliance assessment and approval records
Exit and substitutability	**3 fields**	Exit plans, substitutability and reintegration assessments

Research interpretation. Contract extraction can propose values, but a regulator-ready record must also reconcile vendor master data, operational-resilience evidence, assurance results, governance approvals and owner judgement.

> **Most important design conclusion**
> A missing-information queue is not an edge case. It is likely to be one of the primary outputs of an initial readiness review, alongside source links, conflicts and named ownership for unresolved fields.

SECTION 3: PRACTICAL OPERATING MODEL AND OPEN QUESTIONS

A useful readiness workflow would compile evidence, not replace accountability

1	INTAKE	Collect the contract pack, vendor inventory, materiality policy and existing risk, resilience and governance evidence.
2	COMPILE	Extract candidate facts, import master data and map evidence to the 53-field schema with source-level provenance.
3	RECONCILE	Surface missing, stale and contradictory information, plus taxonomy and conditional-field failures.
4	APPROVE	Route factual confirmation and judgement fields to named owners; retain corrections, comments and decision history.
5	EXPORT	Produce a reviewed evidence record and validate the official FCA template before submission.

Questions this research now needs practitioners to answer

- Which three fields or evidence types consume the most staff time in a real arrangement?
- Which information is already reliable in existing TPRM, GRC, procurement or resilience systems?
- Where do contracts, vendor records and operational evidence most often conflict or become stale?
- Who owns unresolved gaps, and who is accountable for approving materiality and the final record?
- Would a five-arrangement, source-linked readiness diagnostic materially reduce preparation effort?

> **Commercial hypothesis being tested**
> The requirement itself is confirmed. The open question is whether evidence compilation and reconciliation remain sufficiently repetitive, expensive and poorly served to support a focused software-assisted readiness workflow.

Method and sources

Method. Docoply mapped the 53 fields listed in FCA FG26/4 to likely evidence sources and owners, then tested the model using one complete and one gap-heavy synthetic arrangement. The mapping has not yet been validated against real firm records and will vary by operating model.

[1] FCA, Reporting material third party arrangements, 18 March 2026
[2] FCA, FG26/4: Material Third Party Reporting, March 2026
[3] FCA, PS26/2: Operational incident and third party reporting, 18 March 2026
[4] Bank of England / PRA, PS7/26: Operational resilience: operational incident and third-party reporting, March 2026