UK Enhanced SM&CR Firms

July 2026

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Introduction

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Enhanced SM&CR firms are large or complex financial businesses that face extra rules around senior roles, accountability and compliance. These firms are vital to the UK's financial services industry, but the FCA does not publish a list of the population. This makes the enhanced firms difficult to examine as a whole.

We have used several data sources and methods to identify enhanced firms, creating a dataset of more than 500 enhanced firms. Users of the Hackford platform can search over the population. Our approach uses regulatory, corporate and financial signals to identify the population.

This report presents data on the 515 enhanced firms as at July 2026, including size and firm type, changes in senior accountability and the visible technology footprint of these firms.

The cohort is more varied than the enhanced label might suggest. Investment management is the largest firm type, but accounts for only 37% of the firms. This diversity is true of location as well. Despite an obvious focus on large firms, where the expectation would be for a London-dominated group, 42% of the population are based outside the capital. Firm scale also varies sharply, particularly when turnover and employee counts are viewed at legal-entity level.

Governance is changing but not uniformly. Increased turnover of SMF16 Compliance Oversight holders became more common in 2025 and remains elevated in 2026. SMF24 Chief Operations changes also peaked in 2025. Changes to SM&CR as well as operational resilience requirements may be part of the story as firms seek different skill sets or individuals respond to the changing regulatory environment.

To examine one visible layer of the technology used by these firms, we have looked at live web technology detections from their public websites. This provides context for the material third-party notification and annual register requirements that come into effect early next year.

This is only a partial view and cannot identify material arrangements. The typical website produces 115 live web-technology detections, while some larger websites produce thousands. These are detection counts, not counts of distinct technologies, suppliers or arrangements.

We hope this report provides insight into an important but hard-to-see population within UK financial services. The dataset is available on the Hackford platform for our subscribers and is being put to work within our consulting practice.

SM&CR

July 2017
FCA proposes the Enhanced SM&CR regime in CP17/25.

4 July 2018
FCA publishes its policy response and near-final rules in PS18/14.

26 July 2019
FCA finalises the rules extending SM&CR to solo-regulated firms in PS19/20.

9 December 2019
SM&CR commences for FCA solo-regulated firms.

OPERATIONAL RESILIENCE

31 March 2022
FCA operational-resilience rules come into force; firms must have identified important business services, set impact tolerances and begun the required mapping, testing and vulnerability assessment.

31 March 2025
Transitional period ends; firms must have completed mapping and testing and made necessary investments so they can remain within impact tolerances for each important business service during severe but plausible disruption.

18 March 2026
FCA publishes final operational-incident and material third-party reporting rules in PS26/2.

27 March 2026
FCA reports strong progress but identifies continuing areas for improvement, including third-party vulnerability identification and remediation.

18 March 2027
New operational-incident reporting and material third-party notification and register requirements come into force.

Firm overview

Enhanced status does not indicate a single business model or type. The criteria select for larger solo-regulated firms and exclude banks, but the population is varied. Investment managers are the largest group at 37%, followed by insurance at 17% and brokerage and capital markets at 14%.

London accounts for 58% of the cohort, a clear concentration but perhaps a lower share than the sector mix would suggest. Counts fall sharply after London, with Edinburgh next with 12 firms, followed by Birmingham with 10 firms.

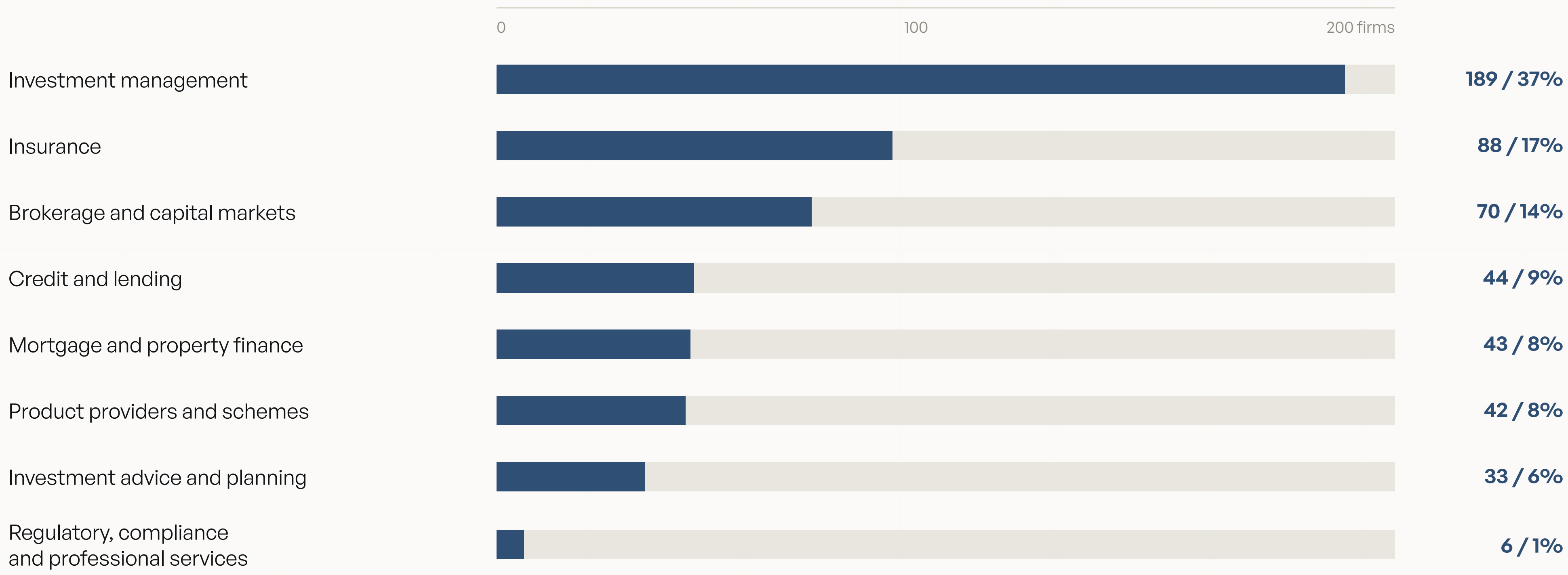
Firm type explains part of this geographic dispersion. Brokerage, capital markets, and investment management are concentrated in London. Insurance, mortgage and property finance, and credit and lending are more dispersed across the UK. The same regulatory status covers firms with materially different markets, operating models, and HQ locations.

ENHANCED SM&CR FIRMS	BASED IN LONDON	INVESTMENT MANAGEMENT	SMF16 ALSO SMF17
515*	58%	37%	44%

* Hackford estimate of the UK Enhanced SM&CR firm population. See methodology (page 7) for details.

Firm types – July 2026

Number and percentage of firms



Firm scale

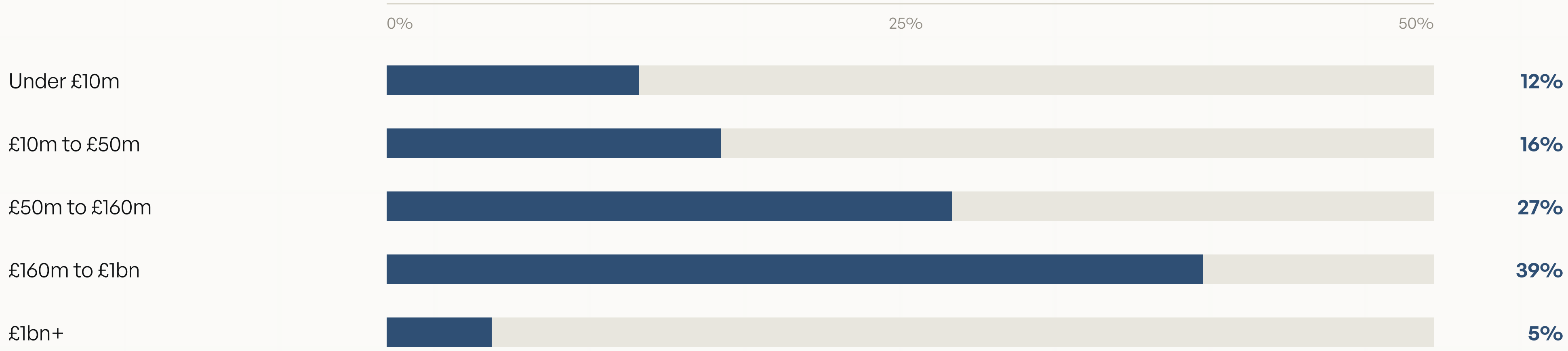
The enhanced criteria select for scale, but not for a uniform type of large firm. Among firms with turnover data, 71% have turnover of at least £50m and 44% have at least £160m. Yet 13% have turnover below £10m. Opting up to Enhanced status and the use of criteria other than turnover help explain the presence of these relatively small firms.

The employee count is more split. Of firms with data, 34% have fewer than 10 employees, while 9% have at least 1,000. This apparent tension with the turnover distribution is not necessarily an inconsistency. Both measures are at legal-entity level, and a regulated entity may sit within a much larger corporate group or support substantial revenue with a small direct workforce.

These stats show enhanced classification does not imply the same compliance resources or needs. A small entity within a large group faces very different governance and resourcing questions from a large standalone firm.

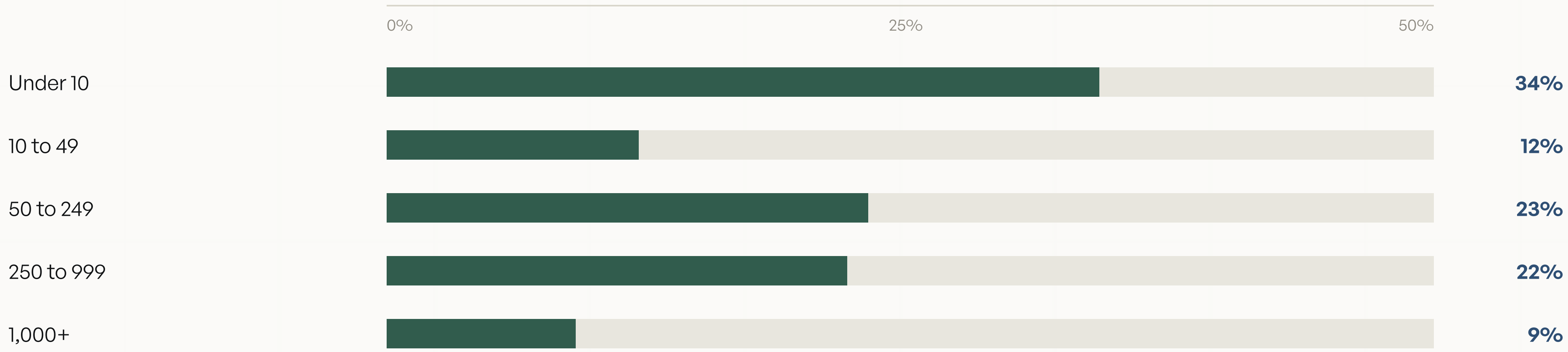
Latest turnover – July 2026

Percentage of firms with turnover data



Latest employees – July 2026

Percentage of firms with employee data



Governance signals

Governance structures are often broad, which is what we expect given that enhanced status requires firms to apply additional SMF types where the relevant roles exist. Of the cohort, 52% of firms have 11 or more distinct current SMF types recorded, while only 6% have between 1 and 3. Breadth at firm level can still coexist with concentration at individual level. In 44% of firms with an active SMF16 Compliance Oversight, the same person also holds SMF17 Money Laundering Reporting Officer (MLRO).

Changes in individuals holding key roles do not follow a simple trend. The chart shows the proportion of firms where the recorded holder changed within a 12-month period. SMF16 churn stayed between 15% and 18% from 2021 to 2024, then rose to 24.8% in 2025 and remained at 23.7% in 2026. SMF24 has a higher and more volatile baseline. It peaked at 44.4% in 2025 before falling to 32.9% in 2026.

New operational resilience rules took effect in March 2022, with the main implementation deadline in March 2025. This provides context for the changing demands on these roles but causality is hard to unpick. Changes to the wider SM&CR may be part of the story as firms seek different skill sets or individuals adapt to changing opportunities and the regulatory environment.

SMF16 ALSO SMF17 · JULY 2026

44%

NEW SMF16 · SIX MONTHS TO JULY 2026

13%

NEW CHIEF EXECUTIVE · SIX MONTHS TO JULY 2026

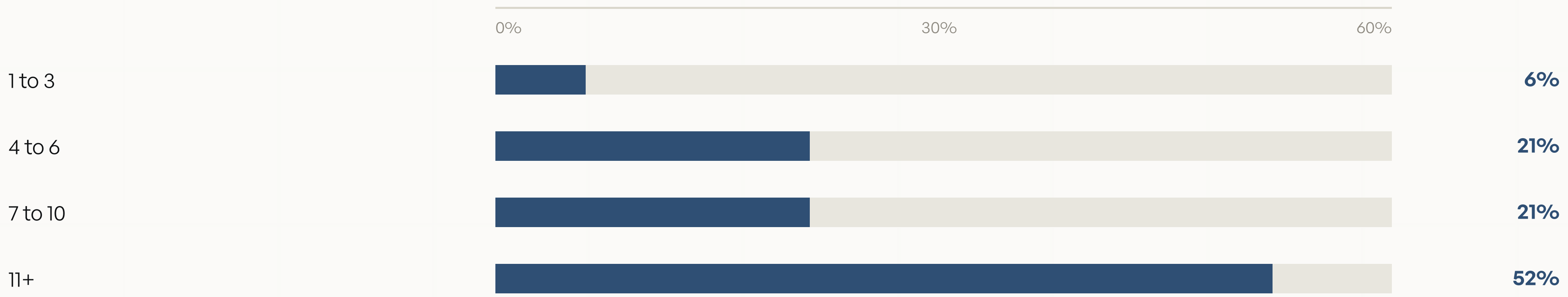
12%

NEW CHAIR · SIX MONTHS TO JULY 2026

12%

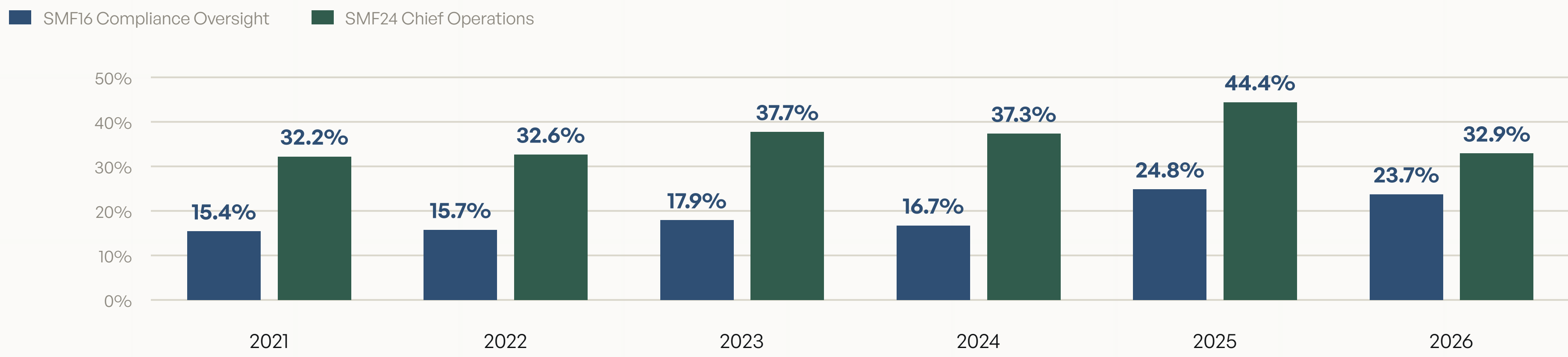
Current senior management functions per firm – July 2026

Distinct SMF types recorded for each firm



Changes in recorded SMF16 and SMF24 holders – July snapshots, 2021–2026

Percentage of firms with a different recorded holder from the previous July, among firms where the function was active at both snapshots



Technology footprint

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More than 40% of cyber incidents reported to the FCA in 2025 involved a third party.[1] To examine one visible layer of firms' technology footprints, we analysed 393 unique websites associated with the enhanced firms and summed live detections across technology groups. The detections include signals from the website stack and externally provided services visible from public pages, such as cloud, email and CRM technologies.

These are detection counts, not counts of distinct technologies, suppliers or arrangements, and they do not identify material third parties. They do show wide variation in the public web signals around the cohort. The typical website produces 115 live detections, with 58% producing at least 100. The distribution has a long upper tail, with some websites approaching 4,000 detections. Websites shared by several regulated entities appear more often towards that upper end, consistent with, but not proof of, group-level infrastructure being exposed via a shared website.

[1] Financial Conduct Authority, "FCA confirms new incident and third party rules to bolster resilience", 18 March 2026.

TYPICAL WEBSITE

115

live web-technology detections

100 OR MORE

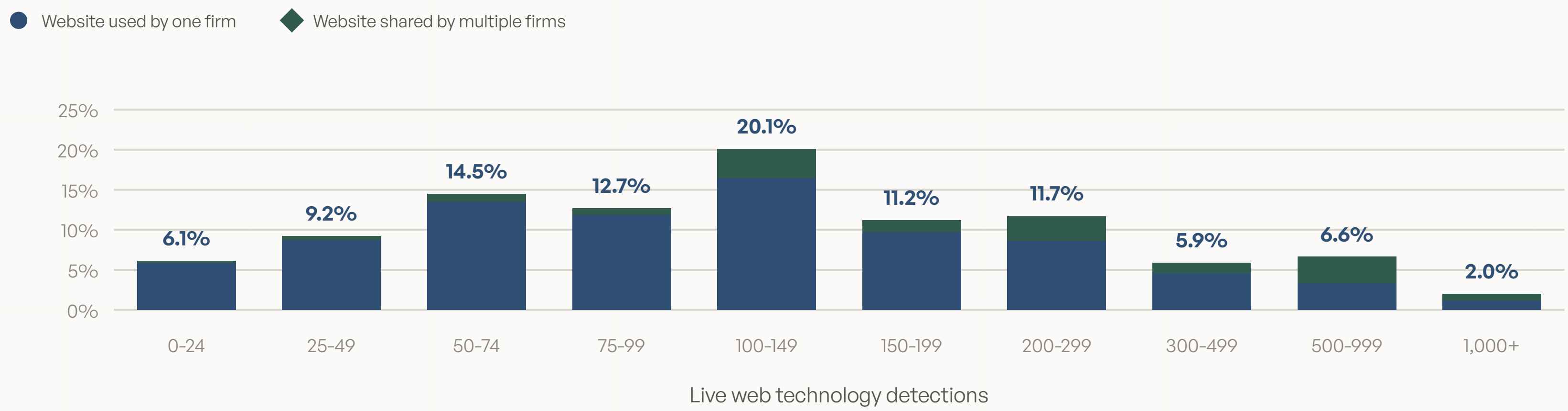
58%

of unique websites

Live web technology detections per website – July 2026

Percentage of 393 unique websites, split by whether each website is associated with one or multiple enhanced firms.

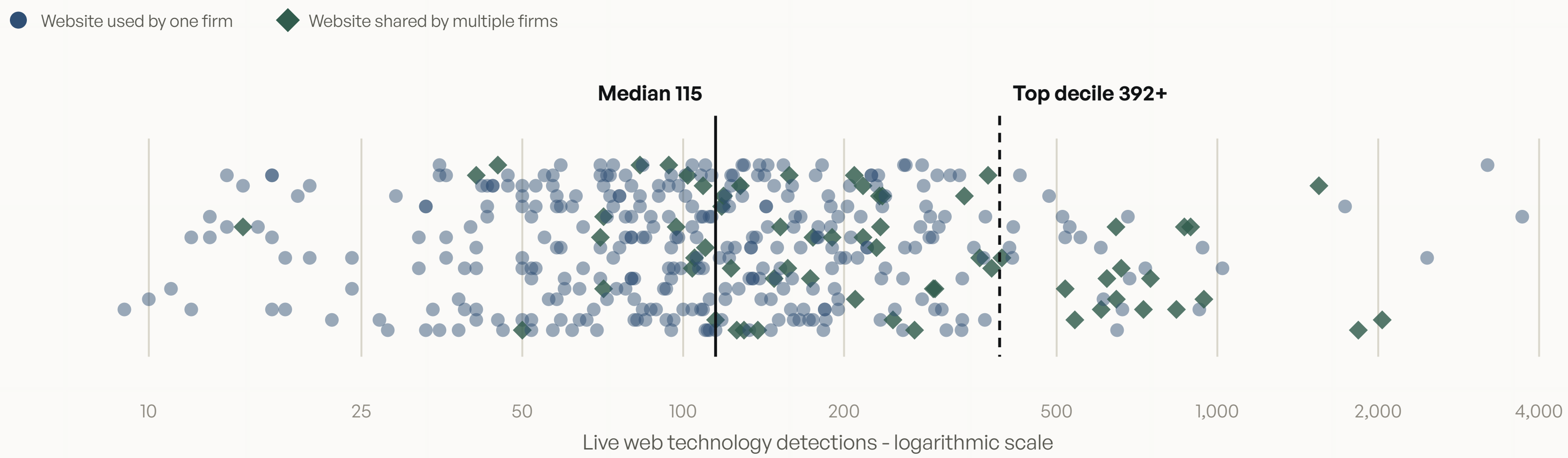
Source: Hackford analysis of BuiltWith data



Live web technology detections across all websites – July 2026

Each mark represents one unique website; the horizontal scale is logarithmic.

Source: Hackford analysis of BuiltWith data



Methodology

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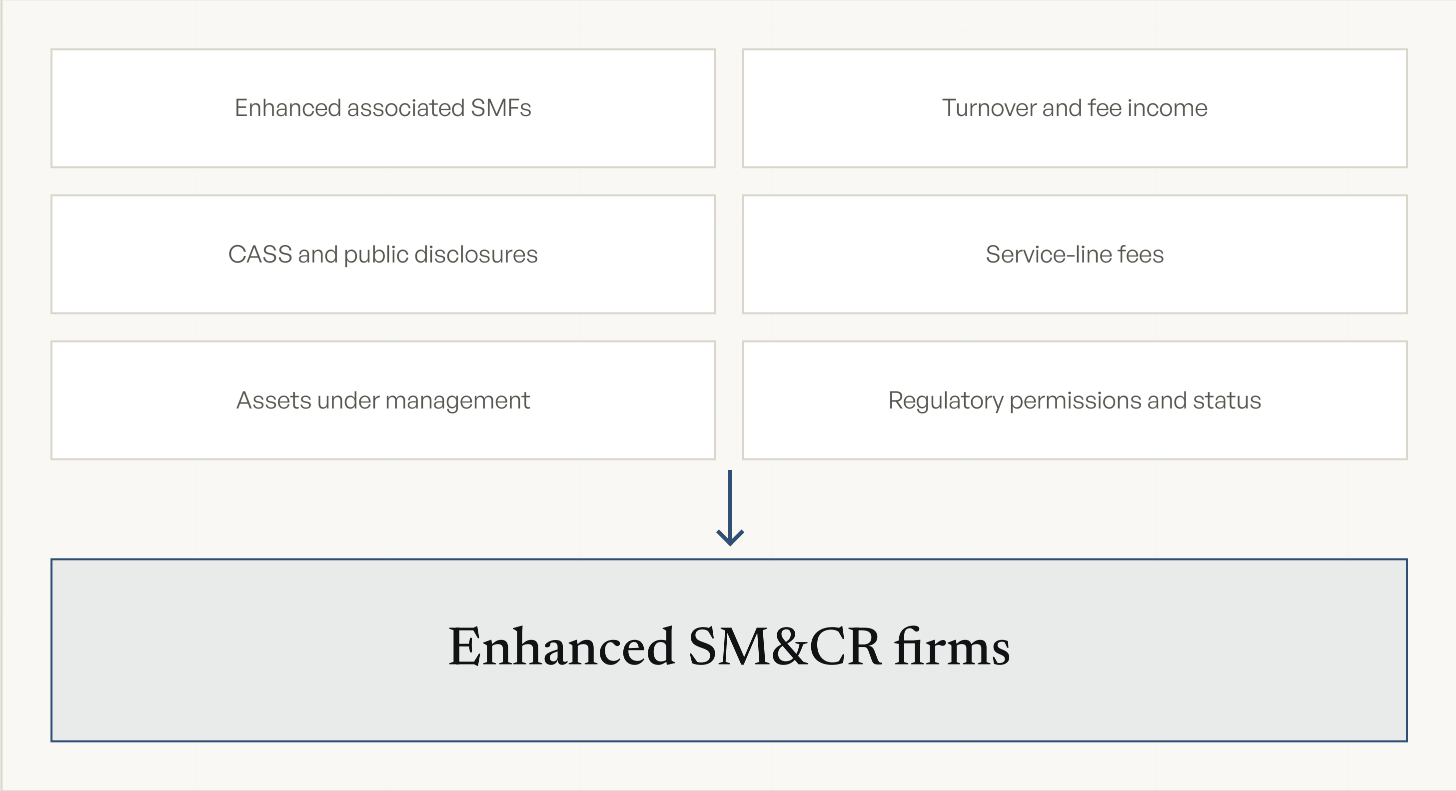
The FCA does not publish a list of enhanced SM&CR firms. To estimate the population, Hackford combines several public signals. These include SMFs associated with enhanced firms, CASS and other disclosures, service-line fees, turnover and fee income where visible, assets under management, regulatory permissions and solo-regulated status. Using several signals helps capture the different criteria required for enhanced status.

In its July 2025 SM&CR review, the FCA gave a rough count of 550 enhanced firms. It also said that many firms had opted up rather than being caught by the thresholds.[1] These firms are harder for a proxy to identify unless they disclose their status. The later increase in financial thresholds may have moved some firms out of scope, although they can choose to remain enhanced.[2]

The report uses a July 2026 firm snapshot and the latest available filed financial data. Turnover percentages cover 376 firms and employee percentages cover 411 firms. Senior-function change rates include firms where the function was active at both July snapshots. The website analysis deduplicates shared websites and sums group-level live counts; one technology may contribute more than one detection.

No proxy can fully identify undisclosed opt-ups or every recent change in status. The cohort of 515 firms should therefore be read as an estimate, not a definitive register. Its proximity to the FCA's earlier rough count, and the breadth of the signals used, make it a useful basis for describing the population.

The full dataset is searchable on the Hackford platform and includes notes on why each firm is considered to be in scope.



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Hackford is a regulatory intelligence platform for teams working with financial-services firms.

It combines FCA Register data, SEC adviser data, Companies House information, proprietary firm classifications, role-change monitoring, watchlists and exports.

To learn more about Hackford's consulting practice or request a demo of the platform, visit **hackforddata.com**.

1 Financial Conduct Authority, *Senior Managers & Certification Regime Review*, CP25/21, paragraphs 4.69–4.74, July 2025.

2 Financial Conduct Authority, "SM&CR categorisation for solo-regulated firms", updated 17 July 2026.

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