



**ISLE OF MAN
FINANCIAL SERVICES AUTHORITY**

Lught-Reill Shirveishyn Argidoil Ellan Vannin

Consultation Paper
Fees from 1 April 2021 and 1 April 2022

CP20-03/T14

Issue Date: 16 October 2020

Closing Date: 11 December 2020

Consultation Paper – CP20-03/T14

This Consultation Paper is issued by the Isle of Man Financial Services Authority, which is the regulatory body for financial services in the Isle of Man.

The purpose of the consultation is to obtain views on proposed increases to fees payable by all regulated entities and designated businesses from 1 April 2021 and 1 April 2022. The consultation is relevant to all persons that are licensed, authorised or registered under the Financial Services Act 2008, Insurance Act 2008, Retirement Benefits Schemes Act 2000, Designated Businesses (Registration and Oversight) Act 2015 or that have responsibility for collective investment schemes under the Collective Investment Schemes Act 2008. It is also relevant to advisers to those persons, or potential applicants for those permissions or their advisers.

The closing date for comments is **11 December 2020**.

Please send comments in writing and preferably by email to:

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Confidentiality and Data Protection

The information you send may be published in full or in a summary of responses. All information in responses, including personal data, may be subject to publication or disclosure in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2015 and the Data Protection Act 2018). If you want your response to remain confidential, you should explain why confidentiality is necessary. Your request will be acceded to only if it is appropriate in the circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding. The Authority is registered with the Information Commissioner as a data controller under Isle of Man data protection legislation. It collects and processes personal data to carry out its functions under relevant legislation and may share personal data with other parties where there is a legal basis for doing so. Further information on how the Authority collects and processes personal data can be found in the Privacy Policy on the Authority's website: <https://www.iomfsa.im/terms-conditions/privacy-policy/>.

If you have a query in relation to how this consultation has been carried out, please contact the Authority's Policy and Authorisations Division by email at Policy@iomfsa.im or by telephone on +44 (0) 1624 646000.

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Glossary

2020-21 Budget	Isle of Man Budget 2020-21
AML/CFT	Anti-Money Laundering and Countering the Financing of Terrorism
Authority	Isle of Man Financial Services Authority
CISA08	Collective Investment Schemes Act 2008
CPI	Consumer Price Index
DBROA15	Designated Businesses (Registration and Oversight) Act 2015
Fintech	Financial technology
FSA08	Financial Services Act 2008
IA08	Insurance Act 2008
PIFM	Predominantly Industry-Funded Model
RBSA00	Retirement Benefits Schemes Act 2000
Regulated Entities	Persons licensed, authorised, registered or otherwise regulated under the Financial Services Act 2008, the Collective Investment Schemes Act 2008, the Insurance Act 2008 or the Retirement Benefits Schemes Act 2000
Treasury	Isle of Man Treasury

1. Executive Summary

1.1 Overview

The Treasury Minister made several announcements regarding the future funding of the Authority in the 2020-21 Budget.¹ A separate Discussion Paper will be issued at the end of October 2020 seeking views on moving the Authority towards a predominantly industry-funded model ('PIFM') in the future. This Consultation Paper focuses on specific proposals to increase fees payable to the Authority from 1 April 2021 and 1 April 2022 to cover the cost of additional resources allocated in the 2020-21 Budget and to start the transition towards a PIFM.

1.2 What is the purpose of this Consultation Paper?

This consultation invites interested parties to consider and provide feedback on proposed increases to fees payable to the Authority from 1 April 2021 and 1 April 2022. This document asks specific questions to assist the Authority in assessing the impact of the proposals, however respondents are welcome to comment on other relevant aspects. Drafts of the secondary legislation required to bring the planned changes into effect are contained in Appendices C to G.

1.3 Who may be affected by this Consultation Paper?

The consultation is relevant to all persons that are licensed, authorised or registered under the FSA08, IA08, RBSA00, DBROA15 or that have responsibility for collective investment schemes under the CISA08. It is also relevant to advisers to those persons, or potential applicants for those permissions or their advisers.

2. Consultation Process

2.1 The Authority's regulatory objectives

The Authority's regulatory objectives are set out in section 2(2) of the FSA08 as —

- (a) securing an appropriate degree of protection for policyholders, members of retirement benefits schemes and the customers of persons carrying on a regulated activity;
- (b) the reduction of financial crime; and
- (c) the maintenance of confidence in the Island's financial services, insurance and pensions industries through effective regulation, thereby supporting the Island's economy and its development as an international financial centre.

The Authority's expenditure is currently covered by approximately 50% fee income and a 50% contribution from the Isle of Man Government in the form of a general subvention from the Treasury. Fee income therefore contributes towards the carrying out of the Authority's functions and maintenance and development of the Island's regulatory framework for financial services. Further information on the Authority's income and

¹ 2020-21 Budget, <https://www.gov.im/categories/tax-vat-and-your-money/2020-21-budget/>

expenditure for the year ended 31 March 2020 can be found in Appendix E of the Authority's Annual Report for 2019/20.²

The Authority must consider certain factors when discharging its functions in accordance with paragraph 3 of Schedule 1 to the FSA08. The most relevant factors for this consultation are considered as follows:

Factor	Information
The need for the regulatory, supervisory and registration regimes to be effective, responsive to commercial developments and proportionate to the benefits which are expected to result from the imposition of any regulatory burden.	The Authority's ability to address all of these factors is dependent on the Authority having sufficient funding and resources available. It is important that there is a suitable regulatory framework in place to protect users of financial services and maintain the Island's reputation as an international financial centre. The Authority and the Treasury are mindful that the Island's frameworks for financial services regulation and Designated Business oversight currently receive a significant level of taxpayer funding. This consultation is an opportunity for stakeholders to consider changes to cover the cost of additional resource allocated to the Authority in the 2020-21 Budget and start the transition towards greater industry funding.
The need to use resources in an efficient and economic way.	
The desirability of implementing and applying recognised international standards.	
The desirability of cooperating with governments, regulators and others outside the island.	
The need to safeguard the reputation of the island.	
The need to promote public understanding of the financial services, insurance and pensions industries.	
The international character of the financial services, insurance and pensions industries and their markets and the desirability of maintaining the competitive position of the Island.	
The desirability of facilitating the development of the financial services, insurance and pensions industries.	
The impact of its decision on the stability of the financial system of the Island.	

2.2 Responding to the Consultation Paper

Open dialogue with stakeholders is an essential element for successful development of the Authority's proposals. Constructive feedback will enable the Authority to reach an informed decision on the content of the proposals and manner of implementation. Respondents should note the following when responding to this Consultation Paper:

- As responses to the consultation may be subject to publication or disclosure in accordance with access to information regimes, respondents should state if they wish their response to remain confidential and, if so, the reasons for this.

² <https://www.iomfsa.im/publications/>

- Submissions received by the closing date of the consultation will be considered but may not necessarily result in a change to the proposals following a review of all responses received.
- Professional bodies, trade associations and other representative groups should provide a summary of the people and organisations they represent when responding to a consultation as well as the methodology used to gain members' input.
- The Authority requests that submissions are not made anonymously as they will not be considered or included in the Consultation Response.

This Consultation Paper has been published on the Authority's website and the Isle of Man Government's Consultation Hub³. A list of specific groups to which this Consultation Paper has been sent is shown in Appendix A.

3. Proposals

3.1 Background

The Authority charges fees to Regulated Entities and Designated Businesses. The Authority's current fees are laid out in the following legislation, which commenced on 1 April 2020 —

- Collective Investment Schemes (Fees) Order 2020;
- Designated Businesses (Fees) Order 2020;
- Financial Services (Fees) Order 2020;
- Insurance (Fees) Regulations 2020; and
- Registered Schemes Administrators (Fees) Order 2020.

For the year ended 31 March 2020, fee income covered approximately 50% of the Authority's expenditure. The rest was covered by a subvention from the Treasury, which is ultimately funded by Isle of Man tax revenue. The Authority last consulted on changes to fees in late 2019 / early 2020. The proposals resulted in a 0.9% increase to all fees in line with inflation based on CPI.⁴

The Treasury Minister made the following remarks about the future funding of the Authority when delivering the 2020-21 Budget in Tynwald on 18 February 2020:

"It is vital that we maintain our focus on maintaining standards of regulation and compliance in the financial services sector to safeguard the island's reputation, ensuring the continued prosperity of the IOM financial services sector and to ensure we are capable of meeting ever changing international standards. To do so we must constantly assess our skills and resourcing to ensure we are positioned to meet these challenges. As a consequence the Financial Services Authority will be given £480,000 additional resource to allow it to protect the Island's high standards of compliance and regulation.

"Also recognising the desirability of the Authority's financial independence, it is intended that plans will be developed for the Authority to move to a predominantly industry funded model

³ <https://consult.gov.im/>

⁴ CP19-07/T14 Fees 2020, https://consult.gov.im/financial-services-authority/fees-2020/consult_view/

in the future. The Treasury and the FSA will shortly undertake a joint consultation on transitioning the FSA towards this desired model.”⁵

A separate Discussion Paper will be issued at the end of October 2020 seeking views on moving the Authority to a predominantly industry-funded model ('PIFM') in the future. This Consultation Paper focuses on proposed increases to all fees payable to the Authority from 1 April 2021 and 1 April 2022 to cover the future cost of additional resources allocated in the 2020-21 Budget and to start the transition towards a PIFM.

3.2 Allocation of additional resources on a phased approach

The Treasury approved an increase to Authority resources in the 2020-21 Budget through some additional permanent and contract staff on a phased basis over the next two years. The additional headcount will be allocated to support key areas of the Authority's work; primarily regulatory supervision, regulatory enforcement and AML/CFT. The reason for the allocation is to maintain the Isle of Man's high standards of compliance and regulation. This was made in response to changes to the environment in which the Authority operates, which have created resourcing challenges in recent years. These include:

- The increased scope of the Authority's activities in terms of new areas of regulation (such as the Insurance Core Principles) and the assignment of new responsibilities (such as responsibility for oversight of Designated Businesses from 2015 and oversight of the Island's Database of Beneficial Ownership from 2017).
- Changes to international standards, which have imposed a broader range of demands on the regulated community and on jurisdictions to demonstrate both technical compliance and effectiveness.
- A rise in the risk appetite of some sectors following increased competition, resulting in the need for more scrutiny to ensure that consumers are appropriately protected.
- A more litigious environment evidenced by higher instances of challenge to the Authority's requests in some cases, resulting in additional work to achieve outcomes.
- The need to be responsive to the development of Fintech solutions and better understand related opportunities and risks.

It was noted that the increased demands on the Authority are largely permanent or long-term in nature. Nevertheless, the Authority is currently planning and implementing a number of system and process changes (e.g. development of the new supervisory system and database) which, when fully implemented and, dependent on future events, may alleviate some of the pressures. As a consequence, some of the new roles are to be contract roles over a fixed term. This will allow resource needs to be monitored and adjusted as necessary.

3.3 Proposed increases to fees payable from 1 April 2021 and 1 April 2022

Increases to fees are proposed to cover the cost of the additional resource allocated to the Authority in the 2020-21 Budget and to start the movement towards a PIFM.

⁵ Budget speech 2020, <https://www.gov.im/media/1368492/budget-speech-2020.pdf>

This Consultation Paper proposes to increase all fees payable to the Authority over the course of two years. This would be achieved by —

- (a) a 20% increase to all fees from 1 April 2021; and
- (b) a further 20% increase to all fees from 1 April 2022.

These changes represent the first significant change to the Authority's fee levels in real terms in recent years. Most fee increases over the past few years have been in line with inflation. Appendix B shows the proposed fee increases with amounts rounded up to the nearest £1.

The Authority takes this opportunity to note that, whilst the new bank recovery and resolution framework will have a direct impact on most Class 1 (Deposit Taking) licenceholders under the FSA08 it is a separate matter. This consultation does not relate to the costs of the Authority acting in its capacity as the Isle of Man Resolution Authority. Those issues will be addressed in a separate consultation.

3.4 Changes to Fees Orders and Regulations

Drafts of the secondary legislation needed to bring the proposals into effect have been prepared and are included in the following Appendices for consideration —

- (a) Appendix C – Collective Investment Schemes (Fees) Order 2021;
- (b) Appendix D – Designated Businesses (Fees) Order 2021;
- (c) Appendix E – Financial Services (Fees) Order 2021;
- (d) Appendix F – Insurance (Fees) Regulations 2021; and
- (e) Appendix G – Registered Schemes Administrators (Fees) Order 2021.

The proposed changes to fee amounts are shown in tracked changes. Some further changes have been made to the structure of the legislation to allow two sets of fees to be specified, i.e. fees payable from 1 April 2021 and 1 April 2022.

4. Impact Assessment

The proposed increases would mean that fees currently paid by regulated entities, designated businesses and applicants would be 20% higher from 1 April 2021 and a further 20% higher from 1 April 2022. With the compound effect, this amounts to a 44% increase in fees over a two-year period. Whilst these increases are significant in percentage terms, the increase in Pound Sterling terms (as can be seen in Appendix B) is relatively modest for most fees. The Authority has undertaken a preliminary assessment on the impact of these increases which suggest that they should be reasonable and proportionate to the financial position of most firms.

5. Questions

Question 1

Do you have any comments on the proposed fee increases? If so, please provide any relevant explanation or supporting information.

Question 2

If you currently pay any annual or periodic fees to the Authority —

- (a) how much are your fees in total; and
- (b) what is your total fee as a percentage of your business turnover?

If you have any additional metrics that you feel would be helpful, please feel free to include them in your response.

Question 3

Following the increases set out in this document, what would your total fee from 1 April 2022 be as a percentage of your anticipated business turnover?

Question 4

When thinking about your licence/authorisation/registration to carry on business, how would you describe the impact of the proposed fee increases on your business? Please provide any information you think may assist.

6. Next Steps

Following closure of the consultation period, the Authority will review the responses received and publish a Consultation Response document on the Authority's website and the Isle of Man Government's Consultation Hub.

Subject to any changes to the proposals that may be made as a result of responses received, it is intended that the draft legislation will be finalised for laying before Tynwald for approval in the first quarter of 2021 for commencement on 1 April 2021.

The proposals outlined in this paper are not intended to substantially address the broader issue of moving the Authority to a PIFM. Respondents are encouraged to consider the separate Discussion Paper on that topic, which will be published soon.

Appendix A – List of groups to which this Consultation Paper has been sent

- Alliance of Isle of Man Compliance Professionals
- Association of Chartered Certified Accountants (as oversight body)
- Association of Chartered Certified Accountants (Isle of Man branch)
- Association of Corporate Service Providers
- Chartered Governance Institute (Isle of Man branch)
- Chartered Institute for Securities and Investment (Isle of Man branch)
- The Department for Enterprise
- Financial Planners & Insurance Brokers Association
- Institute of Certified Bookkeepers (as oversight body)
- Institute of Chartered Accountants In England and Wales (as oversight body)
- Institute of Directors (Isle of Man branch)
- Institute of Financial Accountants (as oversight body)
- Insurance Institute of the Isle of Man
- International Association of Bookkeepers (as oversight body)
- Isle of Man Association of Pension Scheme Providers
- Isle of Man Bankers Association
- Isle of Man Captives Association
- Isle of Man Chamber of Commerce
- Isle of Man Law Society
- Isle of Man Law Society (as oversight body)
- Isle of Man Society of Chartered Accountants
- Isle of Man Wealth & Fund Services Association
- London Institute of Banking and Finance (Isle of Man branch)
- Manx Actuarial Society
- Manx Insurance Association
- Society of Trust and Estate Practitioners (Isle of Man branch)
- The Treasury.

Appendix B – Table of Fee Changes from 1 April 2021 and 1 April 2022

1. Collective Investment Schemes Act 2008

CISA08 Application Fees		2020-21 fee (Current)	2021-22 fee (+20%)	2022-23 fee (+20%)	Overall increase
Authorised schemes					
Authorised scheme – single tier	Per fund	£2,300	£2,760	£3,312	£1,012
Authorised scheme – umbrella	Per fund	£2,127	£2,553	£3,064	£937
Authorised scheme – umbrella	Per sub-fund	£875	£1,050	£1,260	£385
Recognised schemes					
Recognised scheme – p.1, Sch.4		Nil	Nil	Nil	Nil
Recognised scheme – Single tier under p.2, Sch.4	Per fund	£3,929	£4,715	£5,658	£1,729
Recognised scheme – Umbrella under p.2, Sch.4	Per fund	£3,109	£3,731	£4,478	£1,369
Recognised scheme – Umbrella under p.2, Sch.4	Per sub-fund (1-10)	£713	£856	£1,028	£315
Recognised scheme – Umbrella under p.2, Sch.4	Per sub-fund (11 and above)	£498	£598	£718	£220
International schemes					
International scheme – full international		£1,371	£1,646	£1,976	£605
International scheme – other classes of international		Nil	Nil	Nil	Nil

CISA08 Annual Fees		2020-21 fee (Current)	2021-22 fee (+20%)	2022-23 fee (+20%)	Overall increase
Authorised schemes					
Authorised scheme – single tier	Per fund	£1,588	£1,906	£2,288	£700
Authorised scheme – umbrella	Per fund	Nil	Nil	Nil	Nil
Authorised scheme – umbrella	Per sub-fund	£875	£1,050	£1,260	£385
Recognised schemes					
Recognised scheme – p.1, Sch.4		£1,912	£2,295	£2,754	£842
Recognised scheme – Single tier under p.2, Sch.4	Per fund	£2,127	£2,553	£3,064	£937
Recognised scheme – Umbrella under p.2, Sch.4	Per fund	Nil	Nil	Nil	Nil
Recognised scheme – Umbrella under p.2, Sch.4	Per sub-fund (1-10)	£713	£856	£1,028	£315
Recognised scheme – Umbrella under p.2, Sch.4	Per sub-fund (11 and above)	£498	£598	£718	£220
International schemes					

CISA08 Annual Fees		2020-21 fee (Current)	2021-22 fee (+20%)	2022-23 fee (+20%)	Overall increase
International scheme – full international		£1,749	£2,099	£2,519	£770
International scheme – other classes of international		£822	£987	£1,185	£363

2. Designated Businesses (Registration and Oversight) Act 2015

DBROA15 Application Fees		2020-21 fee (Current)	2021-22 fee (+20%)	2022-23 fee (+20%)	Overall increase
Designated business					
Sole trader		£105	£126	£152	£47
Small applicant (2 to 5 employees)		£105	£126	£152	£47
Medium applicant (6 to 15 employees)		£158	£190	£228	£70
Large applicant (16 employees or more)		£262	£315	£378	£116

DBROA15 Annual Fees		2020-21 fee (Current)	2021-22 fee (+20%)	2022-23 fee (+20%)	Overall increase
Designated business					
Sole trader		£158	£190	£228	£70
Small registered person (2 to 5 employees)		£367	£441	£530	£163
Medium registered person (6 to 15 employees)		£784	£941	£1,130	£346
Large registered person (16 employees or more)		£1,045	£1,254	£1,505	£460

3. Financial Services Act 2008

FSA08 Application Fees		2020-21 fee (Current)	2021-22 fee (+20%)	2022-23 fee (+20%)	Overall increase
Class 1 – Deposit Taking					
Class 1 (1) or (2) (deposit taker)		£10,735	£12,882	£15,459	£4,724
Class 1(3) (representative office)		£3,270	£3,924	£4,709	£1,439
Class 2 – Investment Business					
Class 2 (1) to (7) (stockbroker) dealing as principal on own account		£2,515	£3,018	£3,622	£1,107
Class 2 (1) to (7) (stockbroker) not dealing as principal on own account		£2,515	£3,018	£3,622	£1,107
Class 2 (2) and (5)		£2,515	£3,018	£3,622	£1,107
Class 2(3) only		£2,127	£2,553	£3,064	£937
Class 2 (3) and (7) (financial adviser)		£2,127	£2,553	£3,064	£937
Class 2 (3) and (5)		£2,127	£2,553	£3,064	£937
Class 2 (3) and (6) (investment adviser to retirement benefits scheme) and may include (7) (financial adviser)		£2,127	£2,553	£3,064	£937
Class 2 (3) to (7) (discretionary portfolio manager)		£2,127	£2,553	£3,064	£937
Class 2 (3), (4), (5) and (7)		£2,127	£2,553	£3,064	£937

FSA08 Application Fees	2020-21 fee (Current)	2021-22 fee (+20%)	2022-23 fee (+20%)	Overall increase
Class 2 in any other case	£2,127	£2,553	£3,064	£937
Class 3 – Services to Collective Investment Schemes				
Class 3 (1) or (2) (manager or administrator)	£2,127	£2,553	£3,064	£937
Class 3 (3), (4) and/or (5) (trustee, fiduciary custodian or custodian)	£2,127	£2,553	£3,064	£937
Class 3 (6) (asset manager)	£2,127	£2,553	£3,064	£937
Class 3 (7) (investment adviser)	£2,127	£2,553	£3,064	£937
Class 3 (8) (promoter)	£2,127	£2,553	£3,064	£937
Class 3 (9) (management and/or administration services)	£2,127	£2,553	£3,064	£937
Class 3 (10) (administration services to overseas manager and/or administrator)	£2,127	£2,553	£3,064	£937
Class 3 (11) and/or (12) (manager etc. of exempt or exempt-type scheme)	£551	£662	£795	£244
Class 3 (13)	Nil	Nil	Nil	Nil
Class 4 – Corporate Services and Class 5 – Trust Services				
Class 4 and/or Class 5 (excluding Class 5(4) (trust corporation))	£2,246	£2,696	£3,236	£990
Class 5(4) (trust corporation) together with any Class 4 or 5	£2,623	£3,148	£3,778	£1,155
Class 4(6) (professional officer)	£1,749	£2,099	£2,519	£770
Class 5 (2) and/or (5) and/or (6) (professional officer)	£1,749	£2,099	£2,519	£770
Class 6 – Crowdfunding Platforms				
Class 6 (crowdfunding platforms)	£2,127	£2,553	£3,064	£937
Class 7 – Management or Administration Services				
Class 7 (management or administration services)	£551	£662	£795	£244
Class 8 – Money Transmission Services				
Class 8 (1), (2)(b) and/or (3) (bureau de change, payment services as agent and cheque cashing services)	£1,091	£1,310	£1,572	£481
Class 8 (2)(a) and/or (4) (payment services as principal and e-money issuance)	£2,407	£2,889	£3,467	£1,060
Class 9 – Operation of a Credit Union				
Class 9 (operation of a credit union)	£505	£606	£728	£223
Miscellaneous application fees				
Licence extension (within the same Class)	£551	£662	£795	£244
Incidental Class 4 permissions for Class 3 licenceholders	Nil	Nil	Nil	Nil
Management or administration of overseas schemes	Nil	Nil	Nil	Nil

FSA08 Annual Fees		2020-21 fee (Current)	2021-22 fee (+20%)	2022-23 fee (+20%)	Overall increase
Class 1 – Deposit Taking					
Class 1 (1) or (2) (deposit taker)	<£1bn deposits	£20,703	£24,844	£29,813	£9,110
Class 1 (1) or (2) (deposit taker)	£1bn-£5bn deposits	£24,522	£29,427	£35,313	£10,791
Class 1 (1) or (2) (deposit taker)	>£5bn deposits	£27,240	£32,688	£39,226	£11,986
Class 1 (1) or (2) (deposit taker)	Per branch and/or subsidiary	£7,198	£8,638	£10,366	£3,168
Class 1(3) (representative office)		£2,731	£3,278	£3,934	£1,203
Class 2 – Investment Business					
Class 2 (1) to (7) (stockbroker) dealing as principal on own account		£21,577	£25,893	£31,072	£9,495
Class 2 (1) to (7) (stockbroker) not dealing as principal on own account		£12,429	£14,915	£17,898	£5,469
Class 2 (2) and (5)		£8,125	£9,750	£11,700	£3,575
Class 2(3) only		£2,181	£2,618	£3,142	£961
Class 2 (3) and (7) (financial adviser)	≤2 advisers	£1,695	£2,034	£2,441	£746
Class 2 (3) and (7) (financial adviser)	≥3 advisers	£2,181	£2,618	£3,142	£961
Class 2 (3) and (5)		£6,161	£7,394	£8,873	£2,712
Class 2 (3) and (6) (investment adviser to retirement benefits scheme) and may include (7) (financial adviser)		£6,161	£7,394	£8,873	£2,712
Class 2 (3) to (7) (discretionary portfolio manager)		£6,161	£7,394	£8,873	£2,712
Class 2 (3), (4), (5) and (7)		£6,161	£7,394	£8,873	£2,712
Class 2 in any other case		£8,125	£9,750	£11,700	£3,575
Class 3 – Services to Collective Investment Schemes					
Class 3 (1) or (2) (manager or administrator)		£12,429	£14,915	£17,898	£5,469
Class 3 (1) or (2) (manager or administrator)		£8,125	£9,750	£11,700	£3,575
Class 3 (3), (4) and/or (5) (trustee, fiduciary custodian or custodian)	Except for authorised or full international	£12,429	£14,915	£17,898	£5,469

FSA08 Annual Fees		2020-21 fee (Current)	2021-22 fee (+20%)	2022-23 fee (+20%)	Overall increase
Class 3 (3), (4) and/or (5) (trustee, fiduciary custodian or custodian)	For authorised or full international	£30,574	£36,689	£44,027	£13,453
Class 3 (6) (asset manager)		£8,125	£9,750	£11,700	£3,575
Class 3 (7) (investment adviser)		£6,161	£7,394	£8,873	£2,712
Class 3 (8) (promoter)		£1,965	£2,358	£2,830	£865
Class 3 (9) (management and/or administration services)		£13,023	£15,628	£18,754	£5,731
Class 3 (10) (administration services to overseas manager and/or administrator)		£6,161	£7,394	£8,873	£2,712
Class 3 (11) and/or (12) (manager etc. of exempt or exempt-type scheme)		£551	£662	£795	£244
Class 3 (13)		Nil	Nil	Nil	Nil
Class 4 – Corporate Services and Class 5 – Trust Services					
Class 4 and/or Class 5 (excluding Class 5(4) (trust corporation))	0-100 entities	£1,209	£1,451	£1,742	£533
Class 4 and/or Class 5 (excluding Class 5(4) (trust corporation))	101-250 entities	£2,623	£3,148	£3,778	£1,155
Class 4 and/or Class 5 (excluding Class 5(4) (trust corporation))	251-500 entities	£5,018	£6,022	£7,227	£2,209
Class 4 and/or Class 5 (excluding Class 5(4) (trust corporation))	501-1,000 entities	£9,926	£11,912	£14,295	£4,369
Class 4 and/or Class 5 (excluding Class 5(4) (trust corporation))	1,001-2,500 entities	£14,769	£17,723	£21,268	£6,499
Class 4 and/or Class 5 (excluding Class 5(4) (trust corporation))	2,501-5,000 entities	£19,613	£23,536	£28,244	£8,631
Class 4 and/or Class 5 (excluding Class 5(4) (trust corporation))	5,001-7,500 entities	£29,366	£35,240	£42,288	£12,922
Class 4 and/or Class 5 (excluding Class 5(4) (trust corporation))	>7,500 entities	£39,064	£46,877	£56,253	£17,189
Class 5 (4) (trust corporation) together with any Class 4 or 5	0-100 entities	£9,926	£11,912	£14,295	£4,369
Class 5 (4) (trust corporation) together with any Class 4 or 5	101-250 entities	£9,926	£11,912	£14,295	£4,369
Class 5 (4) (trust corporation) together with any Class 4 or 5	251-500 entities	£9,926	£11,912	£14,295	£4,369
Class 5 (4) (trust corporation) together with any Class 4 or 5	501-1,000 entities	£9,926	£11,912	£14,295	£4,369
Class 5 (4) (trust corporation) together with any Class 4 or 5	1,001-2,500 entities	£14,769	£17,723	£21,268	£6,499

FSA08 Annual Fees		2020-21 fee (Current)	2021-22 fee (+20%)	2022-23 fee (+20%)	Overall increase
Class 5 (4) (trust corporation) together with any Class 4 or 5 entities	2,501-5,000 entities	£19,613	£23,536	£28,244	£8,631
Class 5 (4) (trust corporation) together with any Class 4 or 5 entities	5,001-7,500 entities	£29,366	£35,240	£42,288	£12,922
Class 5 (4) (trust corporation) together with any Class 4 or 5 entities	>7,500 entities	£39,064	£46,877	£56,253	£17,189
Class 4(6) (professional officer)	1-15 d'ships	£713	£856	£1,028	£315
Class 4(6) (professional officer)	16-25 d'ships	£930	£1,116	£1,340	£410
Class 4(6) (professional officer)	≥26 d'ships	£1,091	£1,310	£1,572	£481
Class 4(6) (professional officer)	Per d'ship >26	£34	£41	£50	£16
Class 5 (2) and/or (5) and/or (6) (professional officer)	1-5 app'ments	£713	£856	£1,028	£315
Class 5 (2) and/or (5) and/or (6) (professional officer)	6-10 app'ments	£930	£1,116	£1,340	£410
Class 5 (2) and/or (5) and/or (6) (professional officer)	≥11 app'ments	£1,091	£1,310	£1,572	£481
Class 5 (2) and/or (5) and/or (6) (professional officer)	Per app'ment >11	£66	£80	£96	£30
Class 6 – Crowdfunding Platforms					
Class 6 (crowdfunding platforms)		£8,125	£9,750	£11,700	£3,575
Class 7 – Management or Administration Services					
Class 7 (management or administration services)		Nil	Nil	Nil	Nil
Class 8 – Money Transmission Services					
Class 8 (1), (2)(b) and/or (3) (bureau de change, payment services as agent and cheque cashing services)		£1,091	£1,310	£1,572	£481
Class 8 (2)(a) and/or (4) (payment services as principal and e-money issuance)	≤£1m turnover	£1,091	£1,310	£1,572	£481
Class 8 (2)(a) and/or (4) (payment services as principal and e-money issuance)	>£1m to ≤£5m turnover	£6,603	£7,924	£9,509	£2,906
Class 8 (2)(a) and/or (4) (payment services as principal and e-money issuance)	>£5m to ≤£50m turnover	£8,999	£10,799	£12,959	£3,960

FSA08 Annual Fees		2020-21 fee (Current)	2021-22 fee (+20%)	2022-23 fee (+20%)	Overall increase
Class 8 (2)(a) and/or (4) (payment services as principal and e-money issuance)	>£50m to ≤£100m turnover	£11,393	£13,672	£16,407	£5,014
Class 8 (2)(a) and/or (4) (payment services as principal and e-money issuance)	>£100m turnover	£13,195	£15,834	£19,001	£5,806
Class 9 – Operation of a Credit Union					
Class 9 (operation of a credit union)		£253	£304	£365	£112
Miscellaneous annual fees					
Incidental Class 4 permissions for Class 3 licenceholders		£551	£662	£795	£244
Licenceholder in insolvent liquidation		£282	£339	£407	£125
Management or administration of overseas schemes	Per overseas scheme	£551	£662	£795	£244

4. Insurance Act 2008

IA08 Application Fees		2020-21 fee (Current)	2021-22 fee (+20%)	2022-23 fee (+20%)	Overall increase
Authorised insurers					
Authorised life		£5,082	£6,099	£7,319	£2,237
Authorised non-life		£2,602	£3,123	£3,748	£1,146
PCCs and ICCs (whether life or non-life)					
PCC/ICC – core		£2,602	£3,123	£3,748	£1,146
PCC/ICC – cell		£1,306	£1,568	£1,882	£576
Permit Holders (whether life or non-life)					
Permit holder – UK/EU		£1,306	£1,568	£1,882	£576
Permit holder – non-UK/EU		£2,602	£3,123	£3,748	£1,146
Insurance Managers					
Insurance manager		£2,602	£3,123	£3,748	£1,146
Insurance Intermediaries					
Insurance intermediary		£2,439	£2,927	£3,513	£1,074

IA08 Annual Fees		2020-21 fee (Current)	2021-22 fee (+20%)	2022-23 fee (+20%)	Overall increase
Authorised life insurers					
Authorised Insurer Life including PCC or ICC core / cell	'Total liabilities' >£1bn	£65,322	£78,387	£94,065	£28,743
Authorised Insurer Life including PCC or ICC core / cell	'Total liabilities' ≤£1bn	£32,667	£39,201	£47,042	£14,375

IA08 Annual Fees		2020-21 fee (Current)	2021-22 fee (+20%)	2022-23 fee (+20%)	Overall increase
Authorised non-life insurers					
Authorised Insurer Non Life including a PCC or ICC core		£5,578	£6,694	£8,033	£2,455
Authorised Insurer Non Life – cell of a PCC or ICC	Note 1	£660 to £5,578	£792 to £6,694	£951 to £8,033	£291 to £2,455
Authorised Insurer Non Life – cell of a PCC	Maximum aggregate	£32,753	£39,304	£47,165	£14,412
Authorised Insurer Non Life – dormant PCC cell		£142	£171	£206	£64
Permit Holders					
Non-UK/EU Permit holder including PCC core or life cell		£5,578	£6,694	£8,033	£2,455
Non-UK/EU Permit holder non-life cell	Note 1	£660 to £5,578	£792 to £6,694	£951 to £8,033	£291 to £2,455
Non-UK/EU Permit holder non-life cell	Maximum aggregate	£32,753	£39,304	£47,165	£14,412
UK/EU Permit holder		£1,997	£2,397	£2,877	£880
Permit holder – dormant PCC Cell		£142	£171	£206	£64
Insurance Managers					
Insurance manager	One insurer	£2,439	£2,927	£3,513	£1,074
Insurance manager	2-4 insurers	£3,055	£3,666	£4,400	£1,345
Insurance manager	≥5 insurers	£5,190	£6,228	£7,474	£2,284
Insurance Intermediaries					
Insurance intermediary		£2,439	£2,927	£3,513	£1,074

Note 1: The fee for a non-life cell is calculated based on the level of premiums written by the cell.

5. Retirement Benefits Schemes Act 2000

RBSA00 Application Fees		2020-21 fee (Current)	2021-22 fee (+20%)	2022-23 fee (+20%)	Overall increase
In-house administrators					
RBS Administrator – in-house		£120	£144	£173	£53
Professional administrators					
RBS Administrator – professional		£2,602	£3,123	£3,748	£1,146

RBSA00 Annual Fees		2020-21 fee (Current)	2021-22 fee (+20%)	2022-23 fee (+20%)	Overall increase
In-house administrators					
RBS Administrator – in-house – personal schemes	<100 members in aggregate	Nil	Nil	Nil	Nil

RBSA00 Annual Fees		2020-21 fee (Current)	2021-22 fee (+20%)	2022-23 fee (+20%)	Overall increase
RBS Administrator – in-house – personal schemes	Between 100 and 999 members in aggregate	£336	£404	£485	£149
RBS Administrator – in-house – personal schemes	≥1,000 members in aggregate	£4,694	£5,633	£6,760	£2,066
RBS Administrator – in-house – occupational schemes	<100 members in aggregate	Nil	Nil	Nil	Nil
RBS Administrator – in-house – occupational schemes	≥100 members in aggregate	£336	£404	£485	£149
Professional administrators					
RBS Administrator - professional		£4,694	£5,633	£6,760	£2,066

Fee increases have been rounded up to the nearest £1.

Appendices C-G – Draft Fees Orders and Regulations

Drafts of the following secondary legislation has been prepared showing the current 2020 fees and the proposed 2021 and 2022 fees in tracked changes —

- Appendix C – Draft Collective Investment Schemes (Fees) Order 2021;
- Appendix D – Draft Designated Businesses (Fees) Order 2021;
- Appendix E – Draft Financial Services (Fees) Order 2021;
- Appendix F – Draft Insurance (Fees) Regulations 2021; and
- Appendix G – Draft Registered Schemes Administrators (Fees) Order 2021.

Some further changes have been made to the structure of the legislation to allow two sets of fees to be specified, i.e. fees payable from 1 April 2021 and 1 April 2022.

The above documents can be accessed through the Consultation Webpage on the Isle of Man Government Consultation Hub.