

Harbour Lane Payments Ltd

E-money firm · 24 supplier arrangements, from the list alone · FCA PS26/2 and PRA PS7/26 register

Six arrangements carry your payments.
Six more are where your register gets challenged.



Send money from the app. One service, link by link.

Assumed tolerance: 2 hours

The arrangements a payment passes through, in order, with our call on each.

S06	DDoS mitigation and content delivery	Lets it in	Likely material
S01	Cloud hosting and infrastructure	Runs the app	Likely material
S11	SMS one-time passcodes	Approves it	Borderline · Leans material
S10	Fraud scoring (real-time)	Scores it	Borderline · Leans material
S08	Sanctions screening and monitoring	Screens it	Borderline · Leans material
S02	Core e-money ledger and account platform	Records it	Likely material
S04	Faster Payments indirect access	Sends it	Likely material
S03	Safeguarding account provider	Holds the money	Likely material

Outside this chain. Card issuing (S05, likely material), identity checks (S07), the CRM (S09) and offshore support (S12): they serve card payments, balances and onboarding.

12 likely not material. Accounting, payroll, facilities, audit, legal, HR, project tools, analytics, marketing email, recruitment, broadband and insurance.

The one fact that settles it.

Three borderline links turn on the same question: when the service is down, does the payment stop? If it does, they are part of the payment path, and material. For sanctions screening, also ask how fast an outage would be caught: a missed hit is harm whatever the flow.

The risk the list doesn't show.

If the ledger, screening and fraud scoring all run on the same cloud as the app, one outage takes out four links at once. Their subcontractor lists will tell you. The register asks for them anyway.

31 December 2026

Your first register describes the arrangements in place on this day.

18 March 2027

The register and incident reporting rules apply.

When the window opens

The FCA tells you; you then have 90 calendar days to submit through RegData.

Twelve calls that need a reason. Here is ours for each one.

6 likely material. Each would go in your register in full.

S01	Cloud hosting and infrastructure Every service	Hosts the platform every service runs on. The FCA lists cloud and hosting as usually material. Failure stops payments and account access at once, and it cannot be replaced in weeks.
S02	Core e-money ledger and account platform Send money · Pay by card · Balance	The system of record for customer balances. Without it the firm cannot show what each customer holds or move money. Migration would take months.
S03	Safeguarding account provider Send money · Balance	Holds the safeguarded customer funds. Loss of access harms customers directly and puts safeguarding compliance at risk.
S04	Faster Payments indirect access Send money	The route every outbound payment takes. The FCA lists payment and settlement services as usually material. Few alternative sponsors, long onboarding.
S05	Card issuing and processing Pay by card	Authorises every card transaction in real time. Failure means declined cards for all customers.
S06	DDoS mitigation and content delivery Send money · Pay by card · Balance	Sits in front of the app and API. The FCA lists DDoS mitigation as usually material. An outage or attack without it takes the service offline.

6 borderline. Our lean, and the fact that settles it.

S07	Identity verification at onboarding Open an account	Failure stops new customers, not existing ones. It hinges on the tolerance for onboarding and on whether a second provider is live.	Leans material unless a second provider is live and tested
S08	Sanctions screening and monitoring Send money · Pay by card	Material if screening is inline (payments stop when it fails). If it runs after the payment, a missed hit is still harm and a sanctions breach, so the flow alone does not settle it.	Leans material unless it runs after payment and an outage is caught within hours
S09	CRM and customer support platform Balance	Holds customer personal data and complaint records. Customers can still pay if it fails; vulnerable-customer handling may not.	Leans not unless it runs vulnerable-customer handling
S10	Fraud scoring (real-time) Send money · Pay by card	If payments are held when scoring is unavailable, it behaves like part of the payment path. If payments go through unscored, the harm moves to fraud losses.	Leans material if payments are held when it is down
S11	SMS one-time passcodes Send money · Pay by card · Balance	If passcodes fail and there is no in-app alternative, customers cannot log in or approve payments.	Leans material unless most customers can approve in the app
S12	Outsourced customer support (offshore) Balance	An existing outsourcing arrangement that touches customer contact and data. The scale of reliance decides it.	Leans material if it handles most customer contact

Services are the four we assumed (page 3). A lean is our view, not the call: your firm decides each arrangement.

12 likely not material. Recorded, so the decision has a reason too.

S13	Accounting software	Back office. No customer impact. Readily replaced.
S14	Payroll provider	Internal only. No link to a business service.
S15	Office lease and facilities	The FCA lists facilities as usually not material. Staff can work remotely.
S16	External audit firm	Professional service. The FCA lists audit as usually not material.
S17	External legal counsel	Professional service. The FCA lists legal as usually not material.
S18	HR platform	Staff data only. No customer-facing role.
S19	Project monitoring tool	The FCA lists analytical tools such as project monitoring as usually not material.
S20	Website analytics	The FCA lists analytical tools such as website traffic monitoring as usually not material.
S21	Marketing email platform	Holds contact data, but failure has no effect on payments or accounts. Check the data terms separately.
S22	Recruitment agency	Professional service. No link to a business service.
S23	Office broadband and telephony	A utility, which the FCA lists as usually not material. The platform runs in the cloud, not the office.
S24	Corporate insurance broker	Professional service. No operational dependency.

What we assumed.

No list of important business services came with the supplier list, so we used these.

Send money from the app	2 hours
Pay by card	2 hours
See and use your balance	8 hours
Open an account	2 business days

With your real services and tolerances, borderline calls firm up.

Your register, started.

The FCA template asks 46 fields per arrangement: 276 for the six likely material. This Snapshot drafts 66.

Drafted here	11	Check them
Your contracts	6	Contract review
Your suppliers	5	Requested in your name
Your records	24	We flag gaps

This Snapshot. Free, within 48 hours.

The supplier list only, services assumed, a one-line reason for every call and a lean on every borderline one, with the Register starter in the FCA template's own columns.

Register Ready. £4,500 fixed, ex VAT.

Your real services and tolerances, a full written reason for every material and borderline call, contracts reviewed, suppliers chased in your name for up to three weeks, the completed template, and the arrangements to notify before they change. About two weeks.

Next: send your supplier list (names and services are enough), or book 30 minutes at aedraconsulting.com/book.

How we read it. Each arrangement was checked against the FCA's examples of services that are usually material and usually not (FG26/4), tied to the services assumed above, and weighed in outline on AEDRA's seven-factor grouping of FG26/4 3.13. No contracts, continuity plans or supplier information were reviewed, so calls may change once that evidence is seen. Your firm makes the final calls and submits its own register through RegData. Regulatory basis: FCA PS26/2 and FG26/4; PRA PS7/26.