Perfect Title Policy Wording Updates – Q&A [10/09/26]

Q: When will lenders move onto the new Perfect Title policy?

A: Lenders will not automatically move onto the new policy immediately. The transition will be managed individually and in a structured way.

Depending on how long a lender has been a client, there may be a need to re-underwrite them to ensure we have an up-to-date understanding of their checks and balances, types of lending and borrower profiles.

We will also agree an appropriate transition date. This will allow existing offers, decisions in principle and pipeline cases to continue under the existing policy where appropriate, with the new policy applying from an agreed date. That said, we are aiming to transition all clients within 2026.

Q: How will approved jurisdictions be agreed under the new policy?

A: This will form part of the underwriting process. When underwriting a lender, we look at areas such as KYC procedures, how borrowers are identified and the profile of borrowers the lender wishes to accommodate. Where a lender wants to widen its approved jurisdictions, we can revisit these areas and agree an appropriate approach. Importantly, the policy also allows reliance on a borrower's UK right to reside, regardless of their nationality.

Q: Will a firm with two SRA managers plus CQS be covered by the title insurance policy?

A: No. The minimum requirement under the new policy is three SRA-approved partners, directors or members. This was a difficult decision, but one taken primarily in response to the risk of solicitor fraud. Three qualifying individuals plus CQS is acceptable, but two plus CQS does not meet the requirement.

The definition of external conveyancer now covers both the solicitor acting for the mortgage lender and the solicitor acting for the borrower, so lenders should bear this in mind when considering the requirement.
We are continuing to look at technology, risk-management tools and law-firm verification, which may help us develop a more structured approach in the future. For now, however, the minimum remains three.

Q: What happens if we already have cases or offers in the pipeline involving a firm that doesn't meet the new requirements?

A: We will manage the transition to avoid unnecessary disruption to existing cases.

Where an offer has already been issued or a firm is already working on a case, appropriate phasing will be agreed rather than requiring an immediate change of solicitor. We will work with lenders to make the transition as smooth as possible.

Q: What qualifies as "advanced EID"?

A: We do not prescribe a particular EID provider that lenders or solicitors must use.

For our purposes, an advanced EID platform is one that undertakes biometric checks. This would include reading the chip within a passport and comparing the borrower's identification – particularly their photograph – against the relevant official records and any traditional identification documents uploaded as part of the process.

Where advanced EID is used, the requirement for the additional pre-completion checks is removed.

Perfect Title Policy Wording Updates – Q&A Cont.d [10/09/26]

Q: Could the approved jurisdictions requirement be removed altogether?

A: Not at present.

Historically, the approved jurisdictions list has been quite rigid, covering UK nationals and nationals of countries within the EEA, Canada, the USA, Australia, Switzerland and New Zealand.

The new policy provides greater flexibility, subject to appropriate checks and balances. An entirely unrestricted list isn't available at this stage, but we see the new approach as a potential stepping stone towards greater flexibility in the future.

Lenders should consider existing and repeat borrowers, as well as jurisdictions in which they regularly operate, so these can be considered from the outset. The list can also be revisited over time as a lender's borrower profile or sources of business change.

Q: Is DocuSign the only approved platform for the electronic execution of documents and deeds?

A: As things stand today, yes.

Our understanding is that the requirements for electronic execution, particularly in relation to deeds, have been agreed between the SRA, HM Land Registry and other relevant agencies. The appropriate prescribed process must therefore be followed.

Q: Is there a redline or comparison document showing the changes between the old and new policies?

A: Because the overall structure and ordering of the policy wording has changed, a traditional redline comparison would be difficult to follow.

Instead, we have produced a tracker document that identifies the relevant clause in the existing wording, shows how it appears in the new wording and explains the reason for the change. This will be shared alongside the other policy documentation.

Q: Is the July 2026 policy now superseded?

A: Yes. The simplest way to look at it is that the July 2026 version is now the old policy and the new Perfect Title policy supersedes it.

The changes between the versions are documented and explained in the supporting materials that will be provided.

Q: Will the new policy affect cases that have already been underwritten?

A: There will be a transition period to allow current pipeline cases to progress under the existing arrangements.

Based on current discussions with lenders, around 90 days appears to be a typical period for a facility agreement before expiry and therefore a reasonable transition period, although we are open-minded and will work with lenders according to their circumstances.

Our ambition is to retire the current Perfect Title policy by the end of the year at the latest, with lenders transitioning to the new policy between now and then.

Perfect Title Policy Wording Updates – Q&A Cont.d [10/09/26]

Q: Will supporting documents for the new policy be provided?

A: Yes. We will circulate the documentation relating to the new policy, including FAQs and the policy tracker explaining the changes between the existing and new wording.

Q: Does the new policy properly account for Scottish transactions?

A: Yes. We have worked with colleagues in Scotland to review the underwriting criteria and ensure the policy works appropriately across jurisdictions.

While much of the underwriting framework can remain general, there are differences in the legal processes between Scotland and England and Wales. The policy has therefore been specifically updated where necessary to include appropriate Scottish title checks for panel lawyers.

The intention is to make the requirements clearer and easier to follow for anyone reviewing the policy from a Scots law perspective.

Q: Does the new policy change the types of valuation that can be used for security properties?

A: No. The approach to valuation remains flexible.

Lenders can continue to use Red Book valuations, AVMs, desktop valuations or appropriate in-house valuation methods where they have the necessary internal expertise.

In the event of a claim, the lender must be able to demonstrate that the value of the property was assessed, how that assessment was undertaken, and that the loan did not exceed 100% of the property's open market value.

Q: Will premiums change under the new policy?

A: In most cases, no. We currently operate a rating model with a minimum premium structure and there is no expectation that this will change simply because of the new policy. The new policy provides wider cover and greater flexibility, and there is no intention to increase premiums solely as a result of those improvements.

Some longstanding clients remain on older banded premium structures. These arrangements may need to be reviewed and simplified as they move onto the current rating model. This does not mean premiums will automatically increase: depending on the individual book of business, they could move up or down.

The aim is to maintain competitive pricing while simplifying the structure and aligning it with the value and breadth of cover provided by the new policy.