



Type of Order: DISCIPLINARY CONSENT ORDER (IPA0078)

Date of Order: 02 April 2026

Committee name: REGULATION AND CONDUCT COMMITTEE ('the Committee')

Details of IP: **Carl Mc Mullen** of Manchester an Insolvency Practitioners Association (IPA) member and Licensed Insolvency Practitioner (IP).

Summary of complaint: This Order is made in relation to a complaint that Mr Mc Mullen, whilst working as a Licensed IP for two firms, breached the Fundamental Principle of Professional Behaviour of the Insolvency Code of Ethics when he, on more than one occasion:

1. Carried on and/or allowed both firms to carry out the regulated activity of debt counselling
  - a. Outside the exclusion from Financial Conduct Authority (FCA) authorisation afforded to him under Article 72H of the Financial Services and Markets Act 2000 (Regulated Activities) Order 2001, when there was no reasonable contemplation of his own appointment, and
  - b. Without the necessary authorisation from the FCA.
2. Failed to take any action and/or any appropriate action to assess and/or reduce to an acceptable level, threats created by both firms accepting referral fees or commissions from third party debt solution providers.

Accordingly, Mr Mc Mullen was found liable to disciplinary action under the IPA's Articles of Association.

Summary of sanctions: The Common Sanctions Guidance (CSG) provides for potential exclusion and a fine of £5,000 as the starting point for a very serious breach of the Fundamental Principle of Professional Behaviour.

The Committee decided that exclusion was not proportionate or warranted because Mr Mc Mullen was

1. no longer employed by either firm;
2. never a director of either firm; and

3. there was no evidence that he directly benefitted from the referral agreements.

The Committee agreed that the volume of cases referred over a long period of time was an aggravating factor.

The Committee imposed a disciplinary order that Mr Mc Mullen be Severely Reprimanded and fined £10,000.