



Debt Finance Weekly

Tuesday 21st October 2025

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CLIFFORD CHANCE SEMINARS AND BRIEFINGS



Clifford Chance blog post: Federal Court imposes first civil penalty under the Privacy Act – key lessons for cyber governance

On 8 October 2025, the Federal Court handed down its first civil penalty under the Privacy Act 1988 (Cth), marking a pivotal moment in Australian privacy enforcement. Australian Clinical Labs Limited (ACL) agreed with the Australian Information Commissioner to pay a USD 5.8 million penalty for contraventions relating to a cyberattack on Medlab Pathology Pty Ltd that occurred in February 2022 – an incident that occurred just nine weeks after ACL acquired the Medlab business.

Clifford Chance has published a new [Regulatory Investigations and Financial Crime Insights blog post](#) discussing the penalty.

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Clifford Chance blog post: UK financial sanctions – recent enforcement trends

The past 12 months have seen an increase in the volume and pace of enforcement actions published by the Office of Financial Sanctions Implementation (OFSI). OFSI has demonstrated a willingness to take a more proactive approach in response to breaches and in doing so has set out increasing expectations of UK businesses in relation to the components of an effective sanctions compliance framework.

Clifford Chance has published a new [Regulatory Investigations and Financial Crime Insights blog post](#) discussing the trends.

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LEGAL AND REGULATORY



LMA, LSTA and APLMA publish transition loans guide

The [Loan Market Association](#) (LMA) has published the [transition loans guide](#), developed in collaboration with the [Asia Pacific Loan Market Association](#) (APLMA) and the [Loan Syndications and Trading Association](#) (LSTA).

The guide states that as companies and lenders work to align with the climate goal of global net-zero greenhouse gas (GHG) emissions by 2050, transition finance has emerged as a key tool to support decarbonisation in hard-to-abate and/or high-emitting sectors.

The guide is intended to be a practical, voluntary resource designed to support loan market participants navigating the fast-evolving and complex field of transition finance. It provides a foundation for financing credible transition strategies, in the face of persistent challenges, such as fragmented taxonomies, definitional ambiguity, and verification and reporting difficulties. Specifically, the guide:

- clarifies the distinction between transition finance and financing the transition;
- outlines clear parameters for what qualifies as transition finance; and
- presents, in exposure draft form, a voluntary, cross-jurisdictional framework for activity-level, use of proceeds transition loans.

The guide intended to offer borrowers and lenders actionable insights and tools to integrate transition objectives into loan structures. Its aim is to help catalyse large-scale capital flows toward transition activities and accelerate progress toward global decarbonisation goals.

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FCA publishes FAQs on motor finance

The [Financial Conduct Authority](#) has published [frequently asked questions](#) (FAQs) on its motor finance consumer redress scheme consultation.

The FAQs have been added to the consultation webpage and address issues raised by stakeholders during initial engagement. The FCA has stressed that the answers do not set any new policy approach.

The FCA intends to update the FAQs regularly. Currently, FAQs have been added in relation to:

- the Financial Ombudsman Service (FOS);
- firms' communications to consumers;
- firms' communications to professional representatives;
- firms' liabilities relation to 0% APR deals; and
- deceased consumers.

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Kate Gibbons

[Email](#)

Partner

+44 (0) 20 7006 2544

Deborah Neale

[Email](#)

Lawyer

+44 (0) 20 7006 2340

Avril Forbes

[Email](#)

Lawyer

+44 (0) 20 7006 8278

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