



Clive Parker
Financial Conduct Authority
12 Endeavour Square
London E20 1JN

5 June 2019

Dear Clive,

PRACTITIONER PANEL RESPONSE TO CP19/12: CONSULTATION ON INVESTMENT PLATFORMS MARKET STUDY REMEDIES

The Investment Platforms Market Study is a substantial piece of work and we believe the effort put in to it has resulted in a robust analysis and fair set of conclusions. We acknowledge that although overall the market is working well for most of its consumers the industry still has work to do in some areas. We welcome the way this study looks to simplify the market for consumers, rather than adding a further layer of regulation, and recommend that this could usefully be applied to other areas such as pensions.

What actually impacts on consumer behaviour is the cost throughout the distribution chain and the lifecycle of the product, and ultimately the regulator should be addressing this, but we consider the work so far to be a good start. The FCA already has a number of powers in this area which we believe could be exercised without the need for further legislation.

We welcome the specific objective of this consultation, which is to identify means to improve consumers' ability to switch between platforms, not only to benefit from lower costs but also to enable them to move to platforms where better functionality more closely suits their needs. The issue of banning explicit exit charges is not a straightforward one for more than one reason. An outright ban may not be sufficient to prevent customers becoming subject to other product features that increase the costs of moving or charges being applied, for instance, at tax wrapper level.

We are supportive of the FCA's work in this area and would be happy to discuss further if it would be helpful.

Kind regards,

[Signed]

Anne Richards,
Chair, FCA Practitioner Panel