Respondent
2plan wealth management Ltd (Chris Smallwood)
Abi Stidworthy
Active Wealth Ltd
Advantage IFA Ltd
Alison D M Segerman
Amar Financial Services
Anne Rodger
Apex CB Financial Planning Ltd
Aspire Online
AXA Wealth
Barra Gorman
Berkeley Burke Group (Andrew Emery)
Berkeley Burke Group (Tony Durant)
Blevins Franks Financial Management
Blue Scapes
BPH Wealth Management LLP
Brighton Financial Ltd
Broad Wealth Management Ltd
Browning Financial Planning Ltd
Caleb Roberts Financial Management Ltd
Caledonian Financial Management Ltd
Carolyn Callanan
Chartered Financial Management (UK) Ltd
Chattertons
Citygate Consulting Limited
Close Brothers Asset Management
Combined financial Strategies ltd
Cranbourne Financial LLP
D Shearer
Dean Robertson
Douglas Baillie Ltd
Entrust Financial Planners Ltd
Essential IFA
Esteem Money Ltd
Financial Foresight (NI) Ltd
Forward Plan IFA Ltd
Halebarns Financial Planning Ltd
Hall Financial Planning LLP
Highclere Financial Services
Intelligent Pensions
Investec Wealth & Investment
Iwan Jones
James Hay Partnership (Janet Morville-Smith)
John Lord
Jonathan Davis Wealth Management LTD
Joslin Rhodes Lifestyle Financial Planning
Katy Master
Lemonade LLP
Lighthouse Financial Advice
Morgan Financial Ltd
Morgans Ltd
Openwork Limited
Park View FP Ltd
PCM Asset Management Ltd

Penguin
Polygon Financial Ltd
Profile Financial Solutions
Prosperity Wealth Management Limited
Protection & Investment Ltd
Richmond House Group
Rob Coote
Rowley Goodall Ltd
Royal Mail
Simplified Money Ltd
SK Financial
South West Financial Planning
Strategic Investment Solutions Ltd (Chris Kilner)
Strategic Solutions (Michael King)
Sussex Independent Financial Advisers Ltd
Swallow Financial Management LLP
Taurus Global Financial Advisers Ltd
The Minster Partnership llp
Tom Orchard (Annetts & Orchard)
True Potential Wealth Management
Waghorn
Whiting & Partners Wealth Management Ltd
Wishart Wealth Management Ltd

Respondent	Q1: Do people with protected characteristics under the Equalities Act 2010, or any consumers in vulnerable circumstances, have particular needs for financial advice or difficulty finding and obtaining that advice?
2plan wealth management Ltd (Chris Smallwood)	This is not a point which we believe is for the industry to resolve. Our position is to engage with the consumer and provide professional financial advice which they are willing to pay for.
Abi Stidworthy	I have not encountered this however feel financial services mostly discriminates against those who are less wealthy as these people feel they cannot afford financial advise or that it may be over their head and not for them when in fact they would probably benefit the most.
Active Wealth Ltd	Yes I expect they do have issues accessing advice however, every person has financial needs. There does need to be an additional elvel of protection for vulnerable clients
Advantage IFA Ltd	Yes, they often require advise in niche areas such as long term care planning and so forth. This knowledge is quite specialist and not all advisers are confident in dealing with this type of case. IT can be difficult to locate a suitable adviser but also difficult for the vulnerable person to access advise as they can be unduly influenced by other family members who have vested interests.
Alison D M Segerman	Yes, I would think that was self evident
Amar Financial Services	As essentially we are all small firms, it is very difficult to provide any real documented evidence relating to the increase in the advice gap that has undoubtedly occurred since RDR. In some senses for this particular group of consumers this was already happening, as more consumers have joined employer pensions schemes (group stakeholder and now auto-enrolment) through their employers, who may previously have been IFA individual clients for their retirement planning. ● We agree that for general insurance, banking and deposits, credit products and even the lowest levels of savings, consumers have not generally sought advice from advisers and this is likely to remain the case in the future. However, historically IFAs have been the main source of advice for retirement planning, but less so in the future. This has helped to cause the problem now occurring with pension freedoms, as many clients seek to access their pensions, but have no adviser relationship to support them. As from a consumer point of view RDR increased all associated costs of advice (and restricted consumer choice as to how to pay for advice), this resulted in closure of advice channels and the loss of a great many IFAs (either at the date of RDR or earlier knowing that it was coming and unwilling/unable to comply with exam requirements and other issues). Other advice channels were lost to the consumer as a result of increased regulation and the conversion to fees rather than commissions.We have all been faced with turning away potentially new clients with relatively small pension pots as they were unwilling to pay the level of fee that we feel we need to charge to cover full compliance with FCA rules (especially for insistent clients) and the potential future liabilities that all business could entail. Previously these clients may well have had a relationship with an IFA and would probably have been offered ongoing advice, including at retirement. ● Whilst there may well be potential clients who have a lack of trust in advisers (according to your Mintel survey), this is not an issue for those clients who use an IFA, as this has been the major (and at very many firms the only) method in which IFAs obtain their new clients, through existing client referrals. Clearly therefore there is trust between IFAs and their existing clients, as without this client referrals would not happen. A great many small IFAs so not advertise their services whatsoever, relying only on client referrals for expansion. The 'lack' of trust referred to as a reason why clients will not approach IFAs is largely based on the continued negative press that the industry receives (with little or no positive press coverage), but really is a damning confirmation of the complete failure of regulation to stop scams and frauds from taking place, despite the seeming billions spent of this. ● Small IFAs are reluctant to assist certain types of client as Interpretation of regulation is unclear creating known unknowns. It could be argued that the cost of over-regulation has added to the advice gap, as advisers cannot operate cheaply under current requirements. It is also the case, despite what the FCA say, that Small IFAS are running scared of FOS. The effect of this is to over document for protection against FOS, with the consumer having to pay for this, or in perhaps more cases, being rejected as a new client on a cost basis. ● Pre-RDR, a great many advisers used larger commission business cases to subsidise smaller unprofitable business, which has subsequently become impossible. This has had an effect on the advice gap, and also to a large extent, on 'pro-bono' work, which has increased the advise gap. Now that most pay fees, which tend to be lower than commission payments, advisers do not have the spare financial capacity to offer lower paid clients advice for next to nothing. And although many advisers offer pro bono advice to some clients who can't afford advice such clients tend to be the ones who seek Claims Management Companies when opportunities arise. ● Perhaps the biggest reason however for the increase in the advice gap has been the removal of commission from advice, as the consumer had been willing to seek advice on the basis that there was not initially a direct cost to them personally, but now the middle wealth/ mass affluent no longer think advice is worth paying for when the result of the advice is 10 + years ahead. It is this lack of ability to see value short term that has put off consumers seeking advice, as pre-RDR, even though they undoubtedly knew that they were paying for the advice, they were not having to pay out of their own bank accounts here and now. Also, the compliance costs of taking on a new client are so high that unless the client's future fees can cover that cost, the adviser makes a loss on that client. ● It also appears true to say that consumers are having difficulty in understanding what constitutes 'free guidance' and what is advice. Feedback seems to suggest that consumers do not understand these mixed messages.
Anne Rodger	dont know
Apex CB Financial Planning Ltd	Many of these people are on lower income and the cost of advice has increased due to RDR regulation, effectively pricing them out of the market in many cases
Aspire Online	Personally I do not think they do find it difficult to get advice. Of course it may prove challenging to get life cover for a gender reassignee to get life cover (not that I have ever had the opportunity to try) or if an office does not have disability access it could be difficult to get into the office but I believe any adviser would go out of their way to help any of the particular class of person you are discussing in this group provided they wanted the business.
AXA Wealth	The requirements of vulnerable consumers should be fully considered as part of this review. Given that the focus of the review (see question 22) is specifically on investing, saving for retirement and taking a retirement income it would seem appropriate to focus initially on the vulnerabilities associated with these activities.
Barra Gorman	Elderly require advice on later life financial matters. This group typically not suited to online searching, communication & delivery. Most do not know where to find specialist advice. This should be promoted.
Berkeley Burke Group (Andrew Emery)	More should be done to promote a single 'body' as being the definitive "goto" place for financial advice in the UK. There are too many trade bodies for the financial sector in the UK, all of which just serves to confuse the general public. The particular "protected consumers" who may require more assistance than most in obtaining affordable financial advice are: i) from a marriage; does one spouse dominate decisions ii) clarity and assistance is particularly required for those who are recognised as suffering from learning, physical or mental illness iii) the elderly who are not "tech savvy" (may be helped by the development of "robo advice"?)
Berkeley Burke Group (Tony Durant)	No Comment
Blevins Franks Financial Management	No comment
Blue Scapes	Of course!

Respondent	Q1: Do people with protected characteristics under the Equalities Act 2010, or any consumers in vulnerable circumstances, have particular needs for financial advice or difficulty finding and obtaining that advice?
BPH Wealth Management LLP	No comment
Brighton Financial Ltd	The Equalities Act 2010 should protect those with protected characteristics or in vulnerable circumstances from encountering barriers to obtaining financial advice. The Act also requires us to identify any potential barriers that might exist and to take steps to remove it and / or improve processes.
Broad Wealth Management Ltd	Yes advice is needed and difficulty in obtaining advice
Browning Financial Planning Ltd	no comment
Caleb Roberts Financial Management Ltd	Definitely. Should be provided by CAB and other charities but due to lack of funding this isn't possible.
Caledonian Financial Management Ltd	I think they do have a need for financial advice. I think the difficulty is in accessing a good quality adviser. ??How does the man in the street sort the wheat from the chaff?
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	All individuals are likely to have some particular financial need at different stages of their life, regardless of their ???protected characteristic???. The focus should therefore be about whether people are able to ???access??? relevant and appropriate advice/guidance as and when they will need to. Many people may find difficulty in accessing advice and/or guidance if they are unaware or sceptical of the benefits that competent advice can provide, costs are prohibitive, the language used is full of industry jargon or indeed if the sheer volume of information being presented is overwhelming to understand. An individual???s ???protected characteristic??? will only serve to increase this difficulty at the point at which advice/guidance is needed.
Chattertons	No comment
Citygate Consulting Limited	They certainly do and I would suggest this should entirely be on a face to face basis, such that there is less chance of someone who is vulnerable being ripped off or miss-sold a product and given the incorrect advice.
Close Brothers Asset Management	No comment
Combined financial Strategies ltd	No opinion
Cranbourne Financial LLP	Certain vulnerable groups such as the elderly and some with disabilities have particular needs for financial advice. It may be that they have difficulty affording the advice they need. Perhaps if more public money were directed at Citizens Advice and less on some of the needless highly beaureacratic regulation, these groups would get the advice they need
D Shearer	These are my personal opinions. Many people simply have no realisation that they need to plan because they think the State will look after them via the State Pension and benefits. This is a desperate issue. If they do even realise they need to plan, they start far too late to keep the costs manageable. The biggest problem with financial advice is the percentage cost of it that most people think is too high they baulk at it so they simply do nothing. The issue of Equalities Act or special needs is an important (for them, if they actually have any money spare!) but of little overall importance.
Douglas Baillie Ltd	Yes they do. The challenge for advisers is in assessing the ciscumstances properly as this is time consuming and requires skills that the adviser may not have.
Entrust Financial Planners Ltd	I do not believe that they do. My experience is that my firm treats all individuals sympathetically.
Essential IFA	It should not matter whether you are an ordinary individual with no special needs or somebody who is covered under the Equalities Act 2010. Independent Financial Advisers (IFAs) deal with a wide range of individuals and treat them the same. The main barrier for people getting financial advice centres on the number of financial advisers remaining in financial services who are qualified to give financial advice and the lack of public awareness of authorisation rules. There needs to be greater publicity of the regulator register and possibly the introduction of some sort of kite mark to indicate authorisation that people can recognise. Too often vulnerable people can be taken advantage of from unauthorised sources of information either by online sources or scammers. The advantage of people dealing with an authorised and regulated adviser is that even if that client is scammed by a rogue financial adviser, compensation is still due to be paid by the FSCS. Too often the regulator and government seem to be looking for ways to undermine the regulatory system of authorisation rather than using this system to protect the consumers. This is never truer with the rise of online material from websites like MoneySavingsExpert.com who regularly make recommendations on products with no authorisation and no comeback. Needless to say this cold comfort to the readers of this particular website who took up the recommendation to invest in Icelandic banks only to find out that the compensation levels for organisations going bust was considerably lower than the UK. This is only one example of how dangerous unauthorised advice can be to individuals, particularly if they are vulnerable who may use the internet more due to factors such as mobility restraints. If the regulator is to expand online advice then these providers need to be covered by the same level of regulation and authorisation that an IFA has to adhere to and also the same marketing rules.
Esteem Money Ltd	Greater care has to be taken when advising in these situations, firms and advisers can chose if they want to be involved in these cases. Everyone needs advice, irrespective of their situation or circumstance
Financial Foresight (NI) Ltd	Not aware
Forward Plan IFA Ltd	They have a need for personal advice that can be tailored to their specific circumstances. They also need the consistency of the same adviser
Halebarns Financial Planning Ltd	Yes. Industry charges are too high, as are individual firms
Hall Financial Planning LLP	No comment
Highclere Financial Services	n/a
Intelligent Pensions	No comment
Investec Wealth & Investment	Each advice enquiry is different and should be viewed based on the circumstances of the individual (s). Those in vulnerable positions may have different requirements, but they should be taken on merit. Additionally, those in vulnerable circumstances (possibly as a result of equalities act 2010) have tended to seek advice from within their peer groups. With the aging population and growth in age related conditions such as dementia, there are specialised needs for elderly clients to ensure they are adequately protected and many firms already offer specialised advice in this area working within the current legislation to ensure aging clients??? interests are well serve. Firms will continue to refine their procedures and processes in this regard.
Iwan Jones	Yes, definitely so. Having worked for the last 10 months for Citizens Advice under Pension Wise, I am seeing numerous instances of individuals of all sectors of society who are financially unaware of where to turn to for financial advice. More so it is people of limited incomes and savings who need financial advice as to them every penny counts, unlike the people who can afford to pay for financial advice.
James Hay Partnership (Janet Morville-Smith)	No Comments
John Lord	Depends on circumstances. Costs are likely to be prohibitive as for anyone else ??
Jonathan Davis Wealth Management LTD	Everyone needs advice to be clear and appropriate
Joslin Rhodes Lifestyle Financial Planning	I have focussed my answers on those questions of which I have specialist knowledge and I have no specific comment for this question.
Katy Master	No comment
Lemonade LLP	We do not have sufficient knowledge in this area to respond

Respondent	Q1: Do people with protected characteristics under the Equalities Act 2010, or any consumers in vulnerable circumstances, have particular needs for financial advice or difficulty finding and obtaining that advice?
Lighthouse Financial Advice	Yes everyone has needs for advice and those with more challenging circumstances often need more bespoke and more complicated advice. Often too difficult for individual firms to offer. Depending on the need. Often certain disabilities are just not catered for. My mother is registered blind and without relinquishing her decisions via a LPA she would find it very very difficult to access advice as would my Niece with Downs.
Morgan Financial Ltd	I am involved in local advice charity. We find people with mental health issues are easily daunted and intimidated by the process of obtaining financial help, and cannot afford or maintain understanding to benefit themselves.
Morgans Ltd	No comment
Openwork Limited	We do have policies in place to deal with vulnerable customers, but it is fair to say that the risk/reward ratio for this cohort can sometimes be challenging, particularly regarding new pensions freedoms, when customer desire for access can sometimes run contrary to how best advice might be framed.
Park View FP Ltd	I guess yes if they do not know where to look or find advice.
PCM Asset Management Ltd	No
Penguin	no comments to add
Polygon Financial Ltd	Not from us. We have a vunerable person policy in opperation.
Profile Financial Solutions	No comment
Prosperity Wealth Management Limited	We believe all consumers regardless of their circumstances will have some requirement for financial advice at some point during their lifetime. This may include advice regarding state benefits, wills and probate, retirement, divorce, structured financial settlements, family provisions etc, etc. Many consumers rely on traditional sources of 'guidance' from family and friends, known acquaintances or recommended professionals. these all help to point consumers in the right direction. This is further reinforced by organisations such as Citizens Advice Service, Money Advice Service, specialist charities, employment groups etc. today finding information has never been easier but finding the right information and applying it correctly remains as difficult as ever. Consumers need to know that they can trust the source of information and the information itself and ensure that they are able to apply it appropriately. Even as a Financial Adviser I think it is hard to find a reliable source of financial advice that you can trust without having had a point of reference first. The industry has many general practitioners and a much smaller number of specialists. Rather than everyone competing against each other, the profession could consider an approach similar to the NHS with GP surgeries doing the initial screening and referring to specialists to ensure a more holistic planning approach with the client at the centre at the advice process.
Protection & Investment Ltd	No comment
Richmond House Group	No view
Rob Coote	I would expect that the answer to both of the points to be yes. The reasons being that these individuals will have different requirements from the majority and therefore will need specialist advice which may be hard to obtain due to lack of numbers of advisers who specialise in that area &/or cost
Rowley Goodall Ltd	No comment
Royal Mail	Empowering consumers remains at the heart of the work of the Keep Me Posted campaign. With this in mind, we are aware that for many vulnerable consumers it can be challenging to gain access to financial advice and guidance. These groups can include those without easy access to the digital platforms favoured by many financial advice providers or simply those best served by traditional means of communication. The campaign has found that for older consumers and those with long term medical conditions continuing to receive financial advice through traditional hard copy can have a significant impact on their ability to make informed decisions with regards to their personal finances. A research study conducted by London Economics on behalf of the Keep Me Posted campaign found that more than two-thirds (71%) of people who were sent a bank statement by post correctly identified the value of the largest payment into their account, compared to less than one in three (30%) of those who received an electronic statement. Paper statements also enabled people to work out more effectively whether accounts were being well-managed. Three quarters of people (75%) who received the statement by post assessed the health of the account correctly, compared to less than half (48%) of those who received an electronic statement. At present, the rules regarding how service providers interact with disabled customers are not specific and allow many to interpret existing legislation through their wider customer service policies. This has led to a degree of variation in how disabled customers are treated from company to company. The Equality Act of 2010 requires providers to make ???reasonable adjustments??? for customer???s specific needs but in practice this only seems to have been interpreted for those with visual impairments by guaranteeing the provision of braille, large print and audio formats for various correspondence. Customers with motor skills impairments and learning difficulties that might affect the suitability of online financial service advice are not being provided for, except in instances where companies have blanket policies which cover all disabilities. Indeed, research conducted by the Keep Me Posted campaign has found that nearly 60% of telecoms providers actually charge customers with a motor skills impairment for paper bills. Furthermore, most providers do currently make allowances for customers who require their account information to be shared and made accessible to an approved third party, as may be necessary in instances where an individual has learning disabilities. It is the Keep Me Posted campaign???s view that in order to best serve its disabled customers, providers should scrutinise their current policies. Providers must accept that in many cases they may not be able to understand how using the internet to manage an account may inconvenience or provide a barrier to entry for a disabled customer ??? particularly when you consider the variety of specialist needs this classification will include. Best practice should always be to rely on the insight of healthcare specialists. Some providers, for instance, ask for the input of the individual???s GP or simply recognise when someone is registered as disabled. It is the social responsibility of these companies not to financially penalise customers and effectively profit from their vulnerability.
Simplified Money Ltd	No comment
SK Financial	Yes
South West Financial Planning	Yes they do have particular financial planning needs, however I do not believe they have any greater difficulty obtaining advice than any other consumer. That said some of these consumers with protected characteristics may need personal assistance in engaging with such advice.
Strategic Investment Solutions Ltd (Chris Kilner)	
Strategic Solutions (Michael King)	No comment
Dean Robertson	I think that while regulation is important it greatly adds to the work involved in giving simple advice. This has to be paid for so regulation may actually limit the advice some sections of society can gain access to.
Sussex Independent Financial Advisers Ltd	na

Respondent	Q1: Do people with protected characteristics under the Equalities Act 2010, or any consumers in vulnerable circumstances, have particular needs for financial advice or difficulty finding and obtaining that advice?
Swallow Financial Management LLP	Yes they have a need and no access to advice is readily available if they, or their carers look. Whether or not they are prepared to pay for that advice is a separate issue!
Taurus Global Financial Advisers Ltd	Unknown
The Minster Partnership llp	yes
Tom Orchard (Annetts & Orchard)	I believe the current model of operations in financial services mostly discriminates against those who are less wealthy, not by any other way. One area where this may not be the case is in relation to disabled people, who may have more difficulty understanding the complexities of financial advice. I think more work should be undertaken between regulators, professional bodies (then ultimately financial advisers) to offer to work more closely with specialist charities and institutions involved with those with disabilities which would impair their ability to seek out a financial adviser, either directly due to their disability or indirectly due to them not knowing what they are missing.
True Potential Wealth Management	No comment
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	I do not think that they have a particular need though they may find it difficult to obtain at a price that they can afford
Wishart Wealth Management Ltd	I'd imagine so - but would expect charities and Citizen's Advice to help here. Financial advice firms can offer pro-bono services but none (as far as I know) are registered charities. Price pressure on financial advice firms means they unwilling to be involved in this area as potentially a real loss maker (not a loss leader). Advisers can end up 'on the hook' for advice (without limit of time) they have not been paid for.

Respondent	Q2: Do you have any thoughts on how different forms of financial advice could be categorised and described?
2plan wealth management Ltd (Chris Smallwood)	We do not believe that most ordinary people understand the difference between guidance and advice or simplified advice and independent advice. The government, regulator and industry should use any regulatory terms of art correctly. It would help the debate if, when discussing policy options, people are clear when they use financial advice to denote generic financial planning and when they mean investment advice
Abi Stidworthy	I feel there is a market for simplified advice or advice where clients understand there is a simplified/less regulated process as the cost for advicing to a client with very basic needs means that I regularly turn away clients telling them my fees would not be justified in relaction to what they are looking to do and direct them straight to providers however they then end up with no advice at all which is risky! I also feel less jargon in the industry as a whole would be welcomed as i think as it can be very daunting to the majority of people.
Active Wealth Ltd	Simplified (Basic protection needs) Moderate (pension and savings needs) Comprehensive (investments, tax planning, inheritance tax)
Advantage IFA Ltd	Keep it simple and in line with Oxford English Dictionary definitions. Independent Restricted (for restrictions in one form or another) Tied to XXX provider (restricted to advising on the products of XXX)
Alison D M Segerman	Described in plain English so that it is easy for all sorts of people to choose what is best for them.
Amar Financial Services	• Costs – The biggest barrier faced by firms is the cost of regulation; the fact that large parts of it are totally unknown in advance; and that these costs in no way relate specifically to what the firms actually do (i.e. FSCS levies). Costs for seemingly unexplained reasons go up by much more that the rate of inflation annually, whereas firms find it difficult to increase fees to consumers accordingly. • Regulatory rules are complex, shifting and require a great deal of effort to be understood, even by advisers of many years standing. Far too much time is spent generating suitability reports, which cover every possibility in order to be compliant and which the majority of clients do not read, often fear, certainly only file. That same information is then included in the product information and documentation – again far too lengthy, drowning the essential points in legalese and compliance statements which are intended to inform the consumer, but in fact confuse them. Simpler rules and regulation are needed along with simpler products. • FOS – Acting somewhat like an ambulance chasing Claims Management company, by rejecting actual complaints and then ruling on something that was not actually complained about. It is also alleged that FOS apply current rules to historic complaints. • Claims management firms marketing alarming headlines, but mostly submitting speculative claims not based on any actual facts, with no penalty or restrictions for doing so. This appears to create an open-ended liability for advice firms, and which result in the adviser's insurers excluding insurance cover at the next review. • FSCS levies - Exiting firms reduce the pool from which these and other levies may be requested. This in turn creates higher costs for the remaining advisers. Taken to its logical conclusion it must follow that as costs increase ever more advisers, most of whom are nearing retirement age, will wind up their businesses until there are no personal adviser businesses remaining. Younger advisers can see that the business of running a financial service firm is fraught with difficulty and uncertainty and are reluctant to take the financial risk of joining a business or setting up a new one. The funding of the FSCS needs a fundamental rethink. • Clients don't know the value of advice or what sort of advice they are looking for. There is surely a strong case for making financial planning mandatory at schools for 15 year olds upwards. • The 'Long Stop' – The lack of a time scale for bringing a complaint is a major disincentive for advice firms. Your report suggests that only 64 cases have been upheld by FOS where a 15 year period has elapsed since the advice was given. As we know, that may well be 76 advisers now living in poverty in retirement through being financially wiped out.
Anne Rodger	dont know

Respondent	Q2: Do you have any thoughts on how different forms of financial advice could be categorised and described?
Apex CB Financial Planning Ltd	The categorisation of advice should be defined by the scope of advice, not how it is paid for. It should be kept simple. For example: 1. Whole of market (full needs appraisal or limited scope) 2. Company representative (adviser offering the products of 1 provider per product type) 3. Focussed guidance (e.g. by decision tree) ??- "advice" focussed on 1 need area and not taking a holistic view In some ways this is a retrograde step to the Pre-RDR model, however that model was simple enough to explain to the average consumer. The current model is complex - for example trying to compare restricted firms where the nature of the restriction can be broad or narrow.
Aspire Online	This is difficult to answer, I don’t believe that IFA’s give guidance when advising an individual, in a group presentation it may be, i.e. you need to fund your pension, on a one to one basis it is advice, i.e. if you don’t put away so much per month you will struggle in later years...I wouldn’t call what you call focused advise but I would call it “specific” advice. i.e. you only wanted to discuss your pension with me. Of course we know specific advice soon becomes general advice, its hard to stick to one area as other questions always appear.There is no such thing as free advice, pension wise and mas and all these quango’s are paid for by someone and that should be highlighted when advertising the service
AXA Wealth	We agree that unclear and inconsistent terminology, definitions and the language used to describe financial advice can be confusing for consumers. Consumers understandably apply the broadest definition of the term advice irrespective of the regulatory definition i.e. they see information as a form of advice. The description of categories to consumers should be simple, consistent and standardised. We also believe that the way categories are described to consumers should mirror the regulatory description e.g. if a category is badged as information to consumers then it should be described as such in regulation. The regulatory framework under FSMA should be simplified. For example, narrow the parameters of the regulated advice activity of advising on investments (Regulated Advice) to closer reflect the MiFID definition of advice i.e. that it requires a personal recommendation based on the personal circumstances of the consumer. Example category headings: Information: This is essentially what is understood to be generic advice and anything up to point a personal recommendation is provided. Regulated Personal Recommendation: This category would include both the current full and simplified advice categories where a personal recommendation is provided. The description aims to provide a distinction between information and a recommendation. The term ???regulated??? indicates the additional controls, complexity, cost and protection attached to that category i.e. it???s subject to FCA suitability requirements.
Barra Gorman	Yes - Generalist & Specialist as per medical profession
Berkeley Burke Group (Andrew Emery)	The introduction of Client driven, self-sufficing financial advice - similar to both Targeted and/or Restricted advice - but without the expensive regulatory protections of organisations such as the Financial Ombudsman Service, the Financial Services Compensation Scheme, the Pensions Ombudsman Service, etc. Another option may be the introduction of a "simplified factfind" that requires no expensive "soft facts" to be gathered. Whilst such a factfind would be difficult to administer in a Principle, or Outcome based regulatory system as the UK currently employs, it would clearly reduce the advice gap considerably, especially if used alongside the proposed new "self-sufficing" advice. This would quite clearly be easier to introduce with the benefit of "robo advice" and as there would be no necessity for an expensive holistic suitability report, the responsibility for making their own decisions would be left, quite clearly, with the Client
Berkeley Burke Group (Tony Durant)	No comment

Respondent	Q2: Do you have any thoughts on how different forms of financial advice could be categorised and described?
Blevins Franks Financial Management	To be consistent with MiFID II, there would need to be a distinction between personal recommendations and other advice. You could have differing conduct of business rules for the two, and would allow clients to receive regulated advice, for those who would be considered to be not viable to be given personal recommendations. The distinction between domestic advice and personal recommendations is known, and is already considered in the FCA handbook. The distinction can be clarified by the creation of specific regulated activities. The concern would be how IDD advice can be split, as the scope for the distinction does not appear in the same way as it does in MiFID.
Blue Scapes	Retention of asset values - savings / investments Building of above Care needs - later life funding Inheritance matters Fund transfers to children - gifting etc
BPH Wealth Management LLP	The current position is confusing to the general public. As well as independent and restricted tags for financial advisers, there is a worrying trend for quasi-Government bodies such as the MAS to make extensive use of the word "advice" when all they're providing is general information. Advice is a quite clear term in the English language, and shouldn't be used if only information is being provided.
Brighton Financial Ltd	There is, of course, guidance in place which is proving to be very useful from the feedback we have received. That said, we find clients, particularly in complex areas, prefer fact-to-face bespoke advice. I don't like the term 'robo-advice', however, for those not willing or in a position to pay for advice, some sort of automated advice process could be valuable to a sector of consumers. Categories could be:- FACE TO FACE GUIDANCE (but not advice) AUTO-ADVICE (to replace the name robo-advice) It's a tricky one because of the word 'advice' and how that can be delivered compliantly in a cost effective way for the consumer and the organisation delivering the advice.
Broad Wealth Management Ltd	I think in a number of areas if financial education/awareness were better in schools then this would reduce the requirements of needing advice in some areas.
Browning Financial Planning Ltd	no comment
Caleb Roberts Financial Management Ltd	Financial planning Financial product sales
Caledonian Financial Management Ltd	I think how the different forms are named is fine. The difficulty comes when you start to look at what is covered under each type. That is where the lines become blurred and it is my opinion that the man on the street would not have a clue about what any of it means.
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	Financial advice could be either Regulated advice (personalised with recommendations) or Financial guidance (generic with no individual recommendations). To provide clarity for consumers seeking investment or pension advice, services need to be either- Independent regulated advice OR Restricted regulated advice. The addition of multiple other forms of advice is unhelpful for a client to decide what they might want. It is either independent or not.

Respondent	Q2: Do you have any thoughts on how different forms of financial advice could be categorised and described?
Chattertons	Yes, Financial Advice should be completely distinct from brokerage. We already have the words and the definitions of advice and brokerage. All Financial Advice should be independent; anyone not independent should be classified as a broker. People understand this terminology. It is an absolute farce that the regulator allows biased advisers, there is no bias allowed within the legal profession, nor any bias allowed in other professions. Why on earth is it allowed within the financial advisory profession.
Citygate Consulting Limited	Independent = representing a client Tied = representing the insurance company. The key distinction is a state of mind. There are networks out there, such as SJP, that have a gap in their product offering and also steer clients in the wrong direction based on which products provide trail and which do not.
Close Brothers Asset Management	na
Combined financial Strategies ltd	Unfortunately RDR has created many problems here. The introduction of "Restricted" has been a disaster. Customers had a really good understanding of what an IFA meant versus a tied adviser. However, this has been muddied by the introduction of mulit-tie and then restricted. Also many firms now make up names for what they do or they just call themselves Wealth Managers so they do not have to even mention they are tied/restricted. There are two main issues: 1) Is your Advice independent or do you offer solutions from a restricted range of product providers? 2) Do you offer advice on all areas of speciality So the easiest solution would be to focus on the terms "Independent Financial Adviser/Planner" only for those individuals that have the suitable level of qualifications on all areas of speciality (Investments, Pensions, Retirement, Long Term Care & Legacy Planning) that offer solutions from the whole of market. If you offer whole of market solutions but do not have all these qualifications then you would be an "Independent Investment Adviser or independent Pension/Retirement/Long Term Care/Legacy Planning Adviser. or any combination of the above for which you have the correct level of qualifications. If you are "Restricted" you would be a Restricted Financial Adviser/Planner if you had all the qualifications if not you would be a Restricted Investment/Pension/Retirement Adviser etc. or any combination for which they have the qualifications. This would make the roles far more transparent and easy to understand for the consumer.
Cranbourne Financial LLP	No comment
D Shearer	There is a serious need for information (Pensionwise style) which at least gives people basic option - this is needed at a much earlier stage of life. The detailed personalised financial advice is critical but is only possible if you have the realisation that you pay up front and throughout the life of the investment to give yourself the chance of a better income than simple "high interest savings account" (which remain a joke thanks to Govt and banking systems)
Dean Robertson	no comments
Douglas Baillie Ltd	Yes: The concepts of 'focussed advice' and/or 'simplified advice' could become more helpful if they were more clearly defined and were not contradicted by other overlapping rules such as COBS, MiFFID, Perimiter Guidance and the FCA Handbook. for example: Simplified Advice is not defined anywhere. This leads to confusion among advisers, and the fear of a possible FOS subjective and advserse interpretaion taken in retrospect.

Respondent	Q2: Do you have any thoughts on how different forms of financial advice could be categorised and described?
Entrust Financial Planners Ltd	Independent and Restricted is confusing for consumers (according to my clients). However, their main concern is the professionalism of the adviser. The FCA could do much more to promote the skill and professionalism of the industry instead of constant negative comment and headline grabbing fines. The FCA needs to understand that it must play a role in positively promoting professional advice. Simple advice could be made available. I have tried to offer my services at the CAB for this very purpose and they declined as they weren't insured. This seems that regulation is standing in the way of advisers trying to help bridge the advice gap, albeit on a generic simplified basis.
Essential IFA	First off I believe that all journalistic exemption on financial advice should be removed, as it is clear to me that this exemption is being abused. A journalist should report the news, not create a whole business based on giving financial advice online without authorisation or consumer protection. It is clear to me that if a financial adviser set up a website giving online advice and promoting products and services, that financial adviser would have to adhere to FCA rules on promotion of products and services. I find it strange that a journalistic website like MoneySavingsExpert.com and others do not have to comply with the same level of regulation. Often when you read these websites, they have a journalistic principle disclaimer and I am sure that when the FSMA 2000 was originally enacted with this exemption, this was not the intention of the Act. I therefore believe that any website or news outlet advertising products in the UK should either be appointed by a registered firm so any marketing material can be tracked back to the host firm who take full responsibility. The same is true for technical content, this should only be produced by registered firms and should never be produced by unqualified journalists who in some cases get the technical data wrong. How often do we see journalists like Martin Lewis appearing on the BBC giving advice in the area of pensions for example or representatives of Which? when neither hold any qualifications in the area of pensions and investments or indeed hold authorisation in these areas. This undermines the RDR principle of qualifications and more importantly, does not encourage new advisers to enter the industry. At present there are just over 22,000 financial advisers within the UK and the RDR process was implemented to try and raise professional standards to help protect consumers. This cannot be achieved by only regulating half of the advice market as journalists should not have the right to circumvent consumer protection rules just because the hold the title ???journalist???. Instead of creating different categories of financial advice, it is time the regulator takes responsibility of all forms of financial advice and having different categories of levies to cover the potential FSCS claims. This is due to the fact that online providers often do not contribute to the FSCS even though some of their articles contribute to potential claims which raises the operating costs of IFA practices.
Esteem Money Ltd	The more categories there are the more confusing it becomes for the consumer and adviser. keep it simple for everyone's sake and stop tinkering.
Financial Foresight (NI) Ltd	Yes. Independence needs to be more clearly shown on FS Register. Original single tie or Independence clearer for consumer-multi-tie/restricted "grey" & confusing.
Forward Plan IFA Ltd	There needs to be a review of independent and restricted to clarify the advisers status. This should not be based on the range of products offered, but on who they represent ie client or provider and this should be very clear in all literature, advertising etc. Simplified advice cannot be allowed as personal financial planning is not simple.
Halebarns Financial Planning Ltd	I believe if the percentage style of charging was banned and reasonable charges in sterling were used, more people would seek advice. The industry charging structure is designed to confuse. How can so many investment houses have an AMC of 0.75% and how can so many advisers have a 3% initial charge and 1% for ongoing advice. These charges have become the norm by default.
Hall Financial Planning LLP	Independent definition is suitable. Restricted is too general a term. The term 'tied' or similar should be introduced to differentiate between those who advise on a single company's products and those who use a range of companies.

Respondent	Q2: Do you have any thoughts on how different forms of financial advice could be categorised and described?
Highclere Financial Services	The current 'independent' & 'restricted' monikers confuse clients because they have become accustomed to 'independent' meaning able to utilise the products of all relevant providers within the market. The term 'independent' should be reinstated for such advisers. The historic polarisation worked as it was explicit and consumers understood that you either worked on their behalf or worked for or was tied to one provider. The current misdirection created by the use of the word advice within the 'Money Advice Service' makes it abundantly clear to most practitioners that labelling a service as advised, when the actual content is no more than guidance, confuses consumers. However it also places them at the risk of believing they have received advice when no such provision has been given. Any such consumers will not have the protection of the FOS or the FSCS.
Intelligent Pensions	We believe that clear and unambiguous terms should be adopted and promoted by relevant parties including FCA, that create a clear distinction between different forms of advice. The term 'advice' on its own is ambiguous, and needs to be qualified. The term 'professional advice' is not currently in use (e.g. was not included as a term in FG15/1) but does seem a good way to describe advice that carries an expectation of remuneration for the supplier, although not necessarily a fee 'per se' i.e. this could be advice in relation to arranging a particular investment and the remuneration is only earned if the investment proceeds. It would also seem logical that advice that carries the expectation of payment should be regulated advice, and so the term 'professional advice' could be used to describe advice that is provided by an authorised financial adviser, and that relates to a regulated investment(s). There is a need to distinguish between advice relating to a specific issue, whether promoted by the adviser or at the request of a consumer, and we feel the current terms focused and simplified are confusing. The term 'specific professional advice' might be a better option as in 'specific professional advice related to pensions'. etc. 'Generic advice' is a term probably now well understood and might be better described as 'general advice' that could then encompass both guidance (whether automated or otherwise) and advice that does not related to a specific retail investment product. The primary distinction would therefore be between 'general financial advice' and 'professional financial advice'. These are simple terms that capture the essence of each type of service, and it should be highlighted that 'general financial advice' does not provide the same degree of protection as 'professional financial advice' i.e. that the principal of 'caveat emptor' applies.
Investec Wealth & Investment	The vast majority of consumers have no desire or need to distinguish between the various types of advice. Instead of wishing or trying to understand the minutia and/or full implications of an industry generated term, the vast majority will act based on their interpretation of the description, e.g. terms restricted/limited/basic all have negative connotations while the terms focused/independent/personal/specialised appear to be more attractive. Again, the industry should be aware of peoples predilection to seek advice from within their peers or socio-economic class.
Iwan Jones	More use of Third Sector bodies to offer advice and guidance to people on limited incomes/savings . A free service paid for the Treasury to allow everyone access to financial advice and guidance.
James Hay Partnership (Janet Morville-Smith)	We need to find a more compelling way to show the true value of financial planning, as opposed to just buying a product. The starting point should be using laymans terms, not off-putting industry jargon, which is why we support the Citizens Advice Bureauxs call for simplified language. For that reason, advice should be differentiated by client need as its something they are already engaged with, rather than by product recommendation restrictions for example retirement planning adviser home buying adviser rather than pension specialist or mortgage adviser. Standardising terminology would benefit consumers and is something the industry could, and should, actively help drive forward.
John Lord	No comment
Jonathan Davis Wealth Management LTD	Financial sales and Financial Advice - are about products Wealth management is about holisitic advice which is paid for and uses products as means to end of financial security and wealth growth
Joslin Rhodes Lifestyle Financial Planning	I have focussed my answers on those questions of which I have specialist knowledge and I have no specific comment for this question.
Katy Master	No comment

Respondent	Q2: Do you have any thoughts on how different forms of financial advice could be categorised and described?
Lemonade LLP	New definitions would be helpful for advisers and consumers. They would need to be consistently applied and sufficiently long term to be a benefit. We do not believe consumers appreciate the difference between advice and non-advice and as a result do not value the extra cost of advice. Suggested terms could be 'General information' and 'Personalised Expert Advice'. It then becomes a question of would you like PEAs Something that could be understood - over time.
Lighthouse Financial Advice	I think the terminology has been changed so much its led to great confusion. the term Independent has been widened in the advisers responsibilities and the Restricted is too broad a term encompassing all from heavily restricted/panel advisers to those than just restrict a small product category. You need to differentiate the restricted sector to panel or simplified and back t whole of market restricted by product. Terms, well that's your job its just not good enough at the moment
Morgan Financial Ltd	The new fee basis for advice has done this anyway. Those that can afford advice get it. Those that cannot don't. The difficulty is that the costs and 'risks' of being a financial adviser are high and therefore some sort altruistic utopian ideal where the poor and needy get good quality advice is unrealistic.
Morgans Ltd	We need clear labels and descriptions of the different types of financial advice available in the market place. Consumers often do not appreciate that certain types of adviser are able to provide advice on a variety of different topics. Because of the different tiers of regulation under which advisers operate (COB, ICOB and MCOB) some advisers will offer advice on products covered under all these regimes whereas others will not. Often the mortgage man, pensions lady or insurance person (typical consumer labels) could all advise on the full range of regulated services offered by financial advisers. However, consumers do not make this link which suggests there is a lack of understanding of what advisers actually do. This is confused by the fact that different advisers are not necessarily qualified to give advice on all areas of regulated financial advice (the definition of which I include mortgage and protection advice as well as investment and pensions) and other advisers who are qualified may choose not to offer advice on all these matters. As part of my research (see Q3 for reference to this) I interviewed some financial advisers who all confirmed it was not unusual for existing clients at a later date to ask them if they dealt with another area of personal finance. Clearly existing consumers who have already engaged are confused even though at outset the adviser would have outlined the services they provide as part of the disclosure process so for those that have not it must be even worse. We need clear explanations of what different advisers do that are available to consumers and importantly independent information (and evidence) of how these services can add value for consumers.
Openwork Limited	We categorise customers initially into Wealth (Investment, Savings & Pensions) and Mortgage & Protection as this aligns well with the T & C requirements (for licensing purposes) and the FCA handbooks etc. for rule frameworks. We also further divide wealth advice into more straightforward and complex licences. The latter would include occupational pension scheme transfers and VCT and EIS advice for example. Solutions are designed for different income levels, risk appetites and protection needs. We would positively embrace a simplified advice framework which at present represents an unacceptable commercial risk in the absence of a more formalised regulatory framework.
Park View FP Ltd	I believe advice should be so much clearer around both regulated and non-regulated. I do not think that a regulated adviser should be advising on non-regulated products through any wrapper at all. All unregulated advice should be given by unregulated advisers. Clearly then regulated advisers should not be held accountable for non-regulated advise when it fails. At the moment it is so unclear to consumers.

Respondent	Q2: Do you have any thoughts on how different forms of financial advice could be categorised and described?
PCM Asset Management Ltd	Yes. It should be labelled independent, and be independent. Or Not- Independent. and mean Not Independent
Penguin	I think we need to get back to independent and tied - the use of independent has been confused for the market and for the IFA community. People need to be assured that the person they are seeing is truly independent from product providers - too many organisations, such as St James Place, are using these changes to hold them out to be something they are not.
Polygon Financial Ltd	Using RDR as our benchmark and above answer, we operate a retained and transactional service with limited scope for insistent client and execution only transactions.
Profile Financial Solutions	No comment
Prosperity Wealth Management Limited	Over the years many attempts have been made to address this issue with each change further confusing the consumer. It is incumbent upon each professional adviser to be clear, fair and not misleading in describing the services they provide.
Protection & Investment Ltd	Consumers need access to a variety of support on financial matters, including: 1. Education basic education on simple financial matters is vital for all consumers and the financial health of our nation. This needs to start when people are young (e.g. at school, college and university) and continue through life as consumers need to understand different elements changes. 2. Guidance this differs from education in that it provides a more focussed route to address a specific need (e.g. I want to save for retirement; I need to protect my family in case of death). This is not advice and would be delivered remotely with consumers then taking responsibility for decisions they make. 3. Simple advice regulation has to understand that not everyone needs completely holistic advice and best of breed products from across the market. The old industrial insurance provided this at a basic level for any sector of society and commission process did make it cost effective for advisers to assist this marketplace. There is a need for simple solutions to simple needs which can be delivered cost-effectively. Regulation has missed an opportunity for this by creating a framework whereby the requirements to provide simple advice, and the potential liability resulting from it, are broadly the same as full, holistic advice. 4. Full advice a face-to-face, full understanding of a consumers overall position and then relevant, whole of market recommendations.
Richmond House Group	The term "independent" has no meaning due to constant tinkering with such terms. The public do not understand the difference between restricted, independent, guidance and advice. Chartered status is the new gold standard and should be referred to as such. With the increased outsourcing of investment advice by advisers, the main differential should be financial advice and investment advice, and the public educated accordingly.
Rob Coote	I think we should make it clearer for the consumer. Surely we can either be independent or tied (which could be single or multi)
Rowley Goodall Ltd	n/a
Royal Mail	Preserving consumers freedom to choose how they receive financial information is the paramount concern of the Keep Me Posted campaign. Consequently, we would recommend the way in which different forms of financial advice are categorised or described is clearly communicated to consumers. Furthermore we would highlight the importance of ensuring that this is done over the widest range of platforms, including through traditional hard copy mail.

Respondent	Q2: Do you have any thoughts on how different forms of financial advice could be categorised and described?
Simplified Money Ltd	Simplified describes pretty well what we want to offer to those with less sophisticated needs. The issue is being able to be up front with the customer about what this is, what they can do and what to expect, including what level of protection it offers. This is currently unclear. That up front understanding should then hold in the event of a complaint to the Financial Ombudsman (FOS). His assessment of the right outcome should always be considered within the limitations dictated by such a framework. It would not be right to assess a case where the client was only prepared to pay for the equivalent of one or two hours work with the same eye as you would for a client who had been prepared to pay for 3 days. (see safe harbor, Q30) Below that, you also have risk-only/focussed advice as currently offered by the robo-advisers. Again, this would have to put some onus on the consumer to realise they were making the decision to invest and the adviser was simply recommending where ??? and again be understood in assessments by the FOS.
SK Financial	Yes. More should be done to make advice available in an accessible manner. The popularity of people going into the banks pre RDR is an example of how people valued face to face advice. This avenue is now more limited for the masses and indeed for the people that you have characterised above. Consideration should be given to setting up "thought clinics" that are supported by the industry so that people can have access to professionals that can provide "tips" on their financial planning.
South West Financial Planning	Remove the 'Restricted' advice descriptor. A restricted adviser can and will be independent of the provider but restrict their services to the providers and clients that they wish to service for cost and efficiency for their clientele. They are independent in every way except that they do not go to whole of market. The labels are confusing to consumers and do not really help in any way. Restricted advisers are often experts and specialist in their fields and are in essence looked upon as inferior advice channel when in fact they can be superior in their field of expertise.
Strategic Investment Solutions Ltd (Chris Kilner)	
Strategic Solutions (Michael King)	Yes, regulated products with consumer protection should be made clearly separate and distinct from the services of CMCs or those seeking to exploit, for example unregulated companies seeking to cash in on the pension simplification rules
Sussex Independent Financial Advisers Ltd	na
Swallow Financial Management LLP	No, with all the continual changes imposed by the regulator along with firms having to re categorise it has confused the industry into inertia and closed a significant number of firms. So if the industry are unsure how can the public be expected where to go. Try simplicity of categorisation, the requirement to include the whole investment spectrum to classify your self as independent has had the opposite effect as firms did not transact nor wish to transact certain types of business and as such found it easier to classify themselves as restricted.
Taurus Global Financial Advisers Ltd	Basic financial advice. Full Financial advice.
The Minster Partnership llp	no

Respondent	Q2: Do you have any thoughts on how different forms of financial advice could be categorised and described?
Tom Orchard (Annetts & Orchard)	One of the biggest issues missing from how financial advice is categorised is the lack of promotion of the word regulated. A financial adviser (FA) can be anyone, an accountant, a lawyer, the bloke down the pub, or a callous conman either face to face or online. So many scams and hard-luck stories are put down to miss-selling by a financial adviser, but most regulated FAs would run a mile from these schemes, or pay the regulatory penalty if they didnt. What financial services needs to do, from the regulator, the media and advisors is press the value of Regulated Financial Advice. We have seen cases of the public coming to us with terrible products, sold on UK soil, by firms that are not regulated in the UK and who receive enormous commissions (the largest I have seen was over 150,000 on a 1.7m QROPS). These clients had no idea someone transacting on UK soil would not be regulated by a UK regulator. We all get emotionally attached to advice v guidance and the likes, but meanwhile consumers are getting what they believe to be professional advice from non FCA regulated entities. That is one of the most damaging things that can happen, as they will be expecting trusted adviser advice and will be less aware of how badly they could be hurt. One area where I think the regulator has done well is to clamp down and make clearer its stance and the legislation on UCIS. However, we are now even seeing adverts for these products on tube trains where I dont believe the investor would be aware of what they were buying. I think the efforts would be far better focused on sorting this.
True Potential Wealth Management	No comment
Waghorn	N/A
Whiting & Partners Wealth Management Ltd	I think that the previous "independent or tied" definitions worked fine & were, in the main, understood. The current definitions are unclear & not widely understood by the public
Wishart Wealth Management Ltd	Consumers don't get the difference between restricted and independent advice. Firms like SJP go to extraordinary lengths to hide the fact they are restricted. Consumers don't understand that buying off the internet without advice loses them their rights (D2C). FCA still come at advice from a 'product sale' viewpoint when the very best holistic financial advice may not result in a product being recommended. Consumers think Pension Guidance is 'advice' even though this service can't tell you what to do, the right type of product to opt for or where to get the best independent advice. I think they would understand the term buying a product with advice = 'with help' and without advice = 'without help/let buyer beware'.

Respondent	Q3: What comments do you have on consumer demand for professional financial advice?
2plan wealth management Ltd (Chris Smallwood)	In the last ten years, financial advisers have increasingly focused on higher net worth individuals, a trend exacerbated by the Retail Distribution Review (RDR). Whilst advice is readily accessible for general insurance, mortgages and protection, this is not the case for holistic financial planning and investment advice for those with lower asset levels. Indicators show an increasing demand for financial advice; 1.Growing and more affluent UK working population (now at 38m+) 2.Growing and more affluent +65s (now at 11m+) 3.Increasingly complex product and legislative framework (most recently with newly introduced pensions freedoms) requiring advice/guidance/support However - those without wealth also need advice but cant afford it. Current public policy would seem to suggest that they have simple products (safe harbouring) with limited choice, which should work so long as we clearly differentiate the protections offered post sale. Safe harbour cannot equal full advice from a redress perspective
Abi Stidworthy	There is more demand and less firms /advisers to provide it or to provide quality advice.
Active Wealth Ltd	The adviser community has been decimated in recent years by the RDR. There are very few advisers being trained into the industry. The average age of an adviser is 58. There will ball be retiring in the next 10 years. As a business we have never been so busy.
Advantage IFA Ltd	Consumer demand is lower than it should be as there is a generic lack of understanding of the value of advice or what it provides. This problem is exacerbated by MAS, CAB, TPAS and PW where the public have the misconception, understandably, that they can receive free advice. Good quality financial advice should be praised highly and the value of it should be better advertised.
Alison D M Segerman	Consumers want choice. Competition drives costs down. Therefore, a new automated source of advice could be a good addition to existing sources.
Amar Financial Services	• All new products to be screened and approved by the FCA – meaning that if the product subsequently failed through fraud, the adviser would not be liable for claims made for losses incurred. • A new regulator to be set up to regulate the provision of professional advice only – perhaps called the 'Professional Advice Regulator'. All other firms would remain regulated by the FCA or the PRA. This would bring together under one roof all the better qualified advisory firms, with one rulebook specifically for professional advice. Currently advice firms are amalgamated with Investment, Life Assurance, Pension companies and banks and the bad news sticks to the wrong sector. • The introduction of low risk products and specify who/ which type of client the products may be sold to as overseen by independent due diligence provider. And perhaps drop the concept that of products being low/medium/high risk. The idea that anyone can quantify the risk associated with any investment is flawed and misleading. In particular, it misleads the consumer into thinking that someone, somewhere, typically the adviser, has measured the risk of a product. Risk as a relative measure may be used, but again, the consumer tends to confuse the concept of risk as a relative measure with risk as an absolute value. Instead, the measure of risk to the client's financial well-being should be measured against the strategy promoted and recommended by the adviser, not on the basis of a product being deemed suitable or otherwise. • Better guidance on insistent client versus best interest rules. Currently the rules put the adviser on an un-even playing field. One adviser confirms inappropriate advice, another may have a different motivation and end up with a claims management issue. In fact consider a rule that an insistent client who signs a disclaimer cannot therefore approach FOS at a later date. The relationship between the adviser and the consumer must be stated and clear at the outset. The adviser provides advice concerning a single product for a specific need and/or advice that encapsulates a range of products comprehensively. Advice is only an opinion to which the consumer is free to adopt or reject. Insistent clients have a right to determine how to spend their money, even if the adviser does not agree. However, the blame for a subsequent change of heart should not be laid at the door of the adviser and their insurance companies. • Meaningful due diligence is extremely difficult at small adviser form levels – introduce some system to assist firms in this area. Perhaps make this the responsibility of the regulator when approving products. • Reintroduce the 'Long Stop' for future liabilities. • Fund the FSCS through product levies, which is how it should have been set up originally.

Respondent	Q3: What comments do you have on consumer demand for professional financial advice?
Anne Rodger	essential - the financial world is so complex, and there are so many bogus and untrustworthy organisations (even big names can clearly not be trusted necessarily!) that there is a need to build a relationship with an independent trusted individual who can offer advice and guidance
Apex CB Financial Planning Ltd	It is higher than ever due to low interest rates and complex pension changes that have been widely publicised.
Aspire Online	I agree with the research, the FCA concern might be that even £50,000 is too small an investment for many IFA's to take on considering the potential liability for advice
AXA Wealth	There is evidence that the RDR created an advice gap for certain target segments e.g. those with savings but not significant wealth who also lack the knowledge & experience, the combination of which creates inertia. These consumers were traditionally serviced by large life company sales forces or Bank advisers, selling relatively simple solutions (ISAs, Inv Bonds, with profits & unit linked savings etc). Those consumers that are willing to pay for personal recommendations appear well served by the existing adviser market. However, some consumers (even if they are willing to pay for a personal recommendation) may not be commercially viable for small to medium sized adviser firms. During 2014 AXA Wealth undertook a past business review of the personal recommendations provided by its Bancassurance sales force. During the course of the review we kept records of the type of complaints raised by consumers. Interestingly the 3rd largest cohort was not linked to the personal recommendation but the commercial decision to withdraw the service. This would indicate that there is mass market demand for personal recommendations, which historically has been served by Banks and Building Society advisers.
Barra Gorman	Many put off by fear of unknown and adverse media articles re cost and complexity
Berkeley Burke Group (Andrew Emery)	In time, professional financial advice will become a niche-market offering. The historic interference by successive industry regulators and 'consumer watchdogs' have created the "Professional Adviser" - unfortunately, hardly anyone can now afford the Professional Advisers services! It is likely that the number of "Professional" and "Chartered" Advisers will fall below 2,000 by 2025. Unfortunately, the rules of "unintended consequences" have been brought to bear and the D.I.Y. investor/adviser has been created and with the "advice gap".
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	This will depend on the price, especially with regard to small pots
Blue Scapes	It would appear that it has become even more necessary as the financial world has become more complex and unpredictable.
BPH Wealth Management LLP	Different groups have different needs and priorities. For example the less well paid would be more concerned about reducing debt and getting good deals on insurance. The issue is about ensuring that all categories can access some form of independent advice.
Brighton Financial Ltd	With complex issues, professional advice would be the preference for consumers in our experience. Of course, that comes with a cost for consumers which can present a problem. One of the biggest issues is those that have smaller arrangements but who still need (and would value) professional advice but are not able or willing to pay for it. On the whole, we feel it is likely that the majority of consumers would value professional financial advice.
Broad Wealth Management Ltd	consumers in certain demographics have demand for financial advice.
Browning Financial Planning Ltd	no comment
Caleb Roberts Financial Management Ltd	The demand is high but due to the costs of advice the vast majority aren't able to access it. It's no good giving people who have no, or little knowledge, to low cost platforms or decision trees as they need help the most.
Caledonian Financial Management Ltd	I don't think enough people are aware of the benefits of receiving good financial advice. ??

Respondent	Q3: What comments do you have on consumer demand for professional financial advice?
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	The commercial cost for a firm to provide regulated advice results in a market that is largely accessible only to those people with the funds to pay the advice fees. This then leaves a large number of people who would find the financial benefit of such advice would be negated by the fees.
Chattertons	The FCA has failed to educate the public of the value, but with muddied waters over terminology there is no wonder. With a simple advice/brokerage distinction then the FCA could market the value of the adviser in terms of financial planning and the broker in terms of best execution. The FCA needs to market us as we pay the regulatory fees - far more than we need to at present as most claims and interventions are required by other areas of the industry.
Citygate Consulting Limited	The need is greater than ever as the rules keep changing. I met with some friends from university last week for dinner. We are all 35, well educated and as I own my own business, they are all well paid directors earning ??200k plus. They even think the rules are complicated, which I would tend to agree for a lay persons. Hence, if they are unable to decipher things I cannot see how the majority of people would ever navigate their way through things.
Close Brothers Asset Management	No comment
Combined financial Strategies ltd	With changes to pension legislation it is increasing significantly. Lets also not forget that we have a tidal wave of people reaching retirement over the next 15yrs whom have to make some of the most complex and important financial decisions of their lives.
Cranbourne Financial LLP	There is ongoing significant demand for this advice. One problem is poor financial education among consumers, as many do not realise they need advice. Many people are drawn to invest in buy-to-let property for example without understanding the long term costs and implications of doing so. Many people are also drawn into bogus or fraudulent investments e.g. 'parking spaces in Dubai', rather than receiving professional financial advice.
D Shearer	Lots of people don't even know they need it or if they do, baulk at the price (which IS high) The issue of percentage charges being hidden in the investment plans has been addressed but now the very high hourly rate puts people off.
Dean Robertson	I believe that the consumers are more appreciative of professional regulated advice. Clients are using sites such as 'unbiased' so I believe that there are seeing us as professionals.
Douglas Baillie Ltd	The demand is far and away in excess of the capacity of advisers to fulfill it compliantly and at an acceptable cost.
Entrust Financial Planners Ltd	There is potentially massive demand and I believe that the demand is already there, however many consumers are put off by constant negative press comment about the advice sector. The only people positively promoting financial vice are our existing clients who refer us to friends and colleagues on a regular basis. VouchedFor has probably done more for consumer awareness, demand and consumer reassurance in 3 years than the regulator has in 20 years.
Essential IFA	There is a huge demand for financial advice due to pension freedom and the general indebtedness of the general public. We need to look at ways of increasing the number of financial advisers within the UK and indeed limiting their liabilities. Clients who receive good quality financial advice often find that these can be life changing recommendations, particularly when retirement advice has been received for clients in their mid 30s to 40s as often the general public have no ideas of how much lifetime savings they need in retirement. The advice has come about due to the ever increasing level of liabilities on advisers as consumer groups like Which? and others are quick to blame financial advisers for advice and encourage consumers to sue even for minor breaches of FCA rules even though they themselves do not wish to be covered by the same regulations.
Esteem Money Ltd	Professional financial advice should be available for all, irrespective of personal wealth, income or asset value. It is up to the individual to seek this and agree the price that they will pay, and the firm to decide if it wishes to advice. We operate in a retail space, and can trade with who we want to, similar to any other consumer transaction.
Financial Foresight (NI) Ltd	Increasing but still caution over where to access advice. Clear guidance to people not robots/decision trees required.
Forward Plan IFA Ltd	When people understand what IFAs do they can see the need to find one. The problem is that the public do not always understand how we can help and refer back to past scandals etc, not realising how professional the industry has become.
Halebarns Financial Planning Ltd	A large proportion of consumers really need good financial advice but often the charges are too hig for them.

Respondent	Q3: What comments do you have on consumer demand for professional financial advice?
Hall Financial Planning LLP	There still remains a strong desire for advice. The cost of providing advice to those with small assets can be prohibitive. this is particularly true for those wishing to save regularly.
Highclere Financial Services	There is a demand and this has been exacerbated by recent pension freedoms. However the cost of filling this demand when set against the regulatory background of hindsight judgements makes certain advice areas no-go. Additionally, the cost of regulation, which has increased inexorably since 1988, means that assisting the low net worth consumer is not financially prudent. The regulatory view that there should not be cross-subsidies has effectively killed off the likelihood of financial advice for the small investor.
Intelligent Pensions	Many of our clients who rely heavily on us for advice on their pensions and retirement planning will also buy retail investment products on a non advised basis, particularly ISAs, but perhaps also shares. They recognise that pensions are complex and that making a mistake could have serious long term repercussions, and ??we expect the same would apply to other complex areas such as tax and estate planning planning. We think that in the pre retirement mass market middle income category employees will want to gain as much information as possible through non advised sources including online tools and guidance. We also believe that there is scope to offer 'specific professional advice' at key points in their journey towards retirement, at an affordable cost, for example as an optional extension to online tools. This could be provided online (thereby saving significantly on cost) with a follow up report including, for example, advice on what is likely to be the most suitable decumulation option and what changes to the member's fund choice would be appropriate in the years approaching retirement to match the expected decumulation option.
Investec Wealth & Investment	One of the challenges inherent in professional financial advice is that consumers often dont know that they need financial advice at a particular point in time, because unless they are extremely well informed they will not be aware of how a certain legislative or regulatory aspect will affect them. Consumer demand for professional financial advice will inevitably be at the higher end of the market and those advisers operating in these areas will be able to demonstrate that the fees which the consumer would pay would be more than offset by the value provided, whether that be tax planning, protection, sustainability of income, etc. At the lower end of the market (sub 150,000 to invest) the demand will be more for a products led solution and therefore the demand would be more for guidance rather than advice. Also, the value of financial advice can often truly be placed in full context after the event, i.e. at retirement or death.
Iwan Jones	It is biased in favour of those with money, and the people who don't have are priced out of the market. Advisers are afraid of being sued for allegedly incorrect/bad advice and this is the reason IFA numbers are falling year on year. There is a demand for advice with all individuals having a need for advice or guidance at some stage of their life. Unfortunately with the current strict finically regulations there is now a limited supply of IFAs to meet that demand
James Hay Partnership (Janet Morville-Smith)	Two major issues are at play here, which are compounded by affordability issues and a general distrust of the sector. One, people simply dont understand what financial products do - the impact of compound interest on their money, the tax treatment of savings and investments, or their likely financial needs in later life - and they believe that financial advisers are somehow complicit in financial services over complicating what can and cant be done with their money. So the role education plays in bridging the advice gap needs to be understood and advanced before robo advice can be effective. Two, because of the lack of financial literacy there is no appreciation of the value a good financial adviser can add, so advice is invariably going to seem like an expense rather than a necessity. However, everyone would benefit from a review of their goals and help in understanding how they can attain those goals, whether that is from buying a home to securing a comfortable lifestyle in retirement. An educational piece is required to reassure customers about adviser fees and the different ways in which these can be met.
John Lord	Advice to match circumstances is recommended for most individuals. Unfortunately most people don't realise and of those that do charges and risk prohibit many from progressing
Jonathan Davis Wealth Management LTD	mostly mortgage advice which would collapse in a house price crash true wealth management is rising slowly

Respondent	Q3: What comments do you have on consumer demand for professional financial advice?
Joslin Rhodes Lifestyle Financial Planning	Consumers often do not see the different between 'advice' and a 'product'. They view advice as something that is only undertaken at the point of choosing a product. They attach very little value to the 'advice' as they see this as an intangible conversation and instead they attach the value to the product that has been arranged. If the product does not perform as intended then they transfer the value back to the 'advice' and question that. In simple terms, any view advice as a conduit to the product and nothing else. Often they will see it as a barrier to doing what they want to do (i.e. 'cash in' their pension clients will tend to shy away from advise as they perceive that they will be told not to or judged in some way)
Katy Master	No comment
Lemonade LLP	We provide financial advice in the workplace and it is almost universally well received. Those that do not seek it tend to be time poor, see it as an unaffordable luxury or do not believe they need it. However once they have experienced it they value it. In some cases the change is distinct, for example if a potential tax bill is averted. The other reason demand is lower than it should be is because many people in the UK have a low level of financial knowledge.
Lighthouse Financial Advice	Consumers with pension freedoms and the 2016 deadline for RDR price structures means consumers need advice more than ever and the costs to the adviser means they just cannot get what they want for a reasonable cost.
Morgan Financial Ltd	People are desperate for advice that they can trust face to face on an ongoing basis. Rather than finding a way to foster this it seems the regulatory approach is moving away from this.
Morgans Ltd	My own research [Moss J. (2015) Personal Financial Planning Advice: Barriers to Access, University of Birmingham. http://etheses.bham.ac.uk/6016/ - a copy of which I will send with this response] highlights a variety of reasons why consumers increasing need to take financial advice. However it does not quantify this demand as this was beyond the scope of the project.

Respondent	Q3: What comments do you have on consumer demand for professional financial advice?
Openwork Limited	Key demand-side indicators point to increasing demand for financial advice; Growing and more affluent UK working population (now at 38m+) Growing and more affluent +65s (now at 11m+) Increasingly complex product and legislative framework (most recently with newly introduced pensions freedoms) requiring advice/guidance/support However, those without wealth also need advice but cant afford it. Current public policy would seem to suggest that they have simple products (safe harbouring) with limited choice, which should work so long as we clearly differentiate the protections offered post sale. Safe harbour cannot equal full advice from a redress perspective. Simple products, with fewer options, less regulation and simpler processes should be available. For example, a client coming to buy an ISA for10,000 may not be able to afford or desire a full advice service, because the adviser would then have to consider affordability, risk, knowledge, access, review, pensions, alternatives, etc. etc. Consumers neither understand this, nor value the work the range of work the adviser has to do, nor the true cost of assuming the liability for giving the advice in the first place.
Park View FP Ltd	At present with the introduction of both RDR and Pensions freedoms as a frim we are seeing a huge demand for our professional financial planning services.
PCM Asset Management Ltd	It has not changed.
Penguin	There is a demand, a huge demand, as we have proven with our Get Financial Advice business - people want help, they want someone to talk to and want some they can trust to point them in the right direction. The big problem is education - advice, financial advice, has become cloudy and people feel it is "only for the wealthy" or "advice is expensive" - partly because of bad journalism, along with bad advertising.
Polygon Financial Ltd	Less demand post RDR - posably due to seeming inability to cross subsidise - cost in my opinion restricts advise to the more affluent.
Profile Financial Solutions	No comment
Prosperity Wealth Management Limited	High profile regulatory changes such as contracting out of SERPS or more recent pension freedoms typically drive up consumer demand for professional advice. In many circumstances whilst the advice should be quite simple it is often the case that sales people take advantage of ill informed consumers
Protection & Investment Ltd	There is a huge demand for financial advice which, unfortunately, cannot be filled for all consumers due to the costs of providing that advice. There is a natural bias in the surveys mentioned in the CP, in that many consumers don???t realise the advice they require across different parts of their finances until they are aware of it. This is where education is vital as well as reducing the costs of advice so more people have access to advice. There are many examples of consumers seeking advice on one area where they have realised a need (e.g. saving for retirement) but without first ensuring their protection requirements and/or short-term savings are adequate. Segmenting people by value of assets is understandable (particularly for advisers who need to ensure the commerciality of their relationships) but wrong for regulators when determining who should have access to what level of advice. For example, it could reasonably be argued that someone with 20,000 in total savings and a low income needs advice more than someone with 100,000, adequate pensions and a high income. What is the opportunity cost for people of not getting suitable advice?
Richmond House Group	Consumer demand is growing and AE will accelerate this. However, many will not be able to access advice due to the cost and advisers unwilling to service the mass market as the regulatory risks are too high. The burden and cost of regulation needs to be reduced across the board and more dramatically in respect of smaller investments and savings in mainstream products. Financial education at an early stage will help make simplified regulation more appropriate.
Rob Coote	It's there even if they don't possibly know it. People who are 50+ are concerned whether or not they can afford to retire. The reality is that most of them won't be able to do so so its a bit late for them however we need to educate the population not to rely on the state etc
Rowley Goodall Ltd	See Q5

Respondent	Q3: What comments do you have on consumer demand for professional financial advice?
Royal Mail	The Keep Me Posted campaign would suggest that a significant proportion of those actively seeking financial advice and guidance are drawn from groups with a limited ability to access digital platforms. These groups include those with limited financial resources or those, who for generational or health reasons, are constrained in how they can best access financial advice. With this in mind, the Keep Me Posted campaign would highlight that traditional hard copy mail is widely used to provide advice on more suitable products or information to help consumers better manage their consumption. From the consumers perspective, transactional mail is useful in helping them keep track of their transactions, to keep records for future reference, and also to make better decisions about how to manage their finances and consumption.
Simplified Money Ltd	No comment
SK Financial	Yes. More should be done to make advice available in an accessible manner. The popularity of people going into the banks pre RDR is an example of how people valued face to face advice. This avenue is now more limited for the masses and indeed for the people that you have characterised above. Consideration should be given to setting up "thought clinics" that are supported by the industry so that people can have access to professionals that can provide "tips" on their financial planning.
South West Financial Planning	Consumers tend in general to be reactive to the need for advice rather than proactive in seeking advice. Once involved in the advice channel they tend to regret not seeking advice earlier. Consumers are often put off by the perceived cost of advice whereas in the past they were receptive to advice when commissions were possible. Should commissions be reconsidered and disclosed. Why not, many of todays consumers have wealth because of the proactive sales forces of the past who were remunerated by commissions. As such many of the younger generation are being ignored in the advice channels as they do not have the disposable income or savings to fund the advice. It is apparent to me the cost of everything is being considered but not the value or the outcome.
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	It is grater than regulators give credit for it
Sussex Independent Financial Advisers Ltd	No comment
Swallow Financial Management LLP	Yes, the demand is there and always will be there, the fact that something they classify as complex can be translated into their language is paramount. Additionally, online is not touchyfeely nor personable for individuals, during a face to face meeting other areas of their finances can be addressed and savings/changes made which can have a more profound effect on their lifestyle going forward than their initially perceived issue or requirement. On line its yes or no with no ability for a maybe! On a fee paying issue, 99.99% of clients are not prepared to pay hourly fees for advice but they are happy to have the advice fees taken from their investments, either on going service fees or initial fees!
Taurus Global Financial Advisers Ltd	Huge pent up demand for it but the populace doesn't want to pay for it nor can they afford the costs of financial advice either. The reason being that the small IFA is being squeezed by ever rising Regulatory costs, for deeds perpetrated by others in the industry, who then default on their obligations. Leaving those standing to pick up the bill each year. This is unjust
The Minster Partnership llp	not enough cost effective advisers available because the public conception is too expensive and unnecessary
Tom Orchard (Annetts & Orchard)	The demand for advice outstrips the ability of the FA sector to provide it. More and more complex products and legislation and less and less gold-plated risk free employer and state benefits have led to increases in demand. This combined with the demographics of people living so much longer has meant an unprecedented demand amongst those aware of the need for advice. Unfortunately, this has led to the dreadful categorisation by value of consumers, where naturally, businesses (which ultimately FA firms are) have decided the metric to cull their clients as being their financial worth to their firms, nothing else. This means those lower down the wealth chain are not getting the help they need. This is almost as bad as those who have no idea that they need help, as although they sit in ignorant bliss right now, they wont do forever. No matter what other solutions are banded around, (many from those with vested interests) the only satisfactory solution to the problem is more advisers and those to be of a high quality, both technically and ethically.

Respondent	Q3: What comments do you have on consumer demand for professional financial advice?
True Potential Wealth Management	I feel that consumers whether they have 10,000 or 1,000,000 deserve the same level of service, in an ideal world. However reality is that most advisers do not advise people on 10,000 as they feel that there is not enough income available through such a transaction. The opportunity should exist for clients with a lower amount of money to invest to receive a shortened version of advice aimed directly at an ISA for example.
Waghorn	I have used an IFA for over 30 years. They varied in quality to start with but, in the last 15 years the quality of advice has been of a high standard. I believe that professional financial advice acts as a reminder and a signpost for prudent personal planning. I am not a natural financial planner but my moderately comfortable retirement, should I choose it, has been made possible by the quality of advice and support I have received.
Whiting & Partners Wealth Management Ltd	Advice is as necessary now as it has ever been, perhaps more so with the new pension freedoms
Wishart Wealth Management Ltd	Demand is very high - but if you want a Chartered/Certified Financial Planner whom is experienced - the supply is low. As in any free market where demand high/supply low the price (of advice) rises. With a 98.5% hike in FSCS fees yet having nil to do with Arch Cru/UCIS/Key data and all the scandals, we now look at what we charge in detail (a direct result of RDR) so we will only do work where we can operate at a profit. Unlikely consumers with under 200k invested assets can afford our fees nor would we want such consumers. We can afford to pick and choose. We are qualifying each client a much as they are qualifying us.

Respondent	Q4: Do you have any comments or evidence on the demand for advice from sources other than professional financial advisers?
2plan wealth management Ltd (Chris Smallwood)	2plan wealth management is a national firm of 250 IFAs. Over recent years the advisers have reduced the number of clients they provide advice to (c150 250) and increasingly find themselves moving upmarket to wealthier clients who it is more profitable for them to serve. Citizens Advice, in a recent paper , identified a series of advice gaps. The affordable advice gap consisting of 5.4 million people who are willing to pay for advice, but not at current price levels; the free advice gap consisting of 14.5 million people who would benefit from advice, but are not in a position to pay for it and the awareness gap relating to 10 million people who miss out on the benefits of advice because they do not know advice is available or how to get it.
Abi Stidworthy	no.
Active Wealth Ltd	All advisers I know are very very busy! In many cases demand is outstripping availability
Advantage IFA Ltd	I have people who have come to me for advice following disappointing experiences with CAB and PW where they thought they would get advice. The bulk of my existing clients have no interest in PW as they do not want to go through an additional factfinding process when a professional adviser already knows their circumstances and they are paying me to look after them. Interestingly the one new client who had sessions with both received different guidance and both PW and CAB were unable to calculate his monthly outgoings accurately.
Alison D M Segerman	No comment
Amar Financial Services	• Robo user friendly advice opportunity is vast, as is the cost. An older generation may struggle. The above points without protection of a 'Sand Box' for 18 months, are likely to overshadow development
Anne Rodger	most other sources are linked to a specific organisation and therefore cannot be said to be independent
Apex CB Financial Planning Ltd	No
Aspire Online	I believe many consumers are quite capable of buying equity ISA's, term assurance, personal pensions online and without advice, however I know that they will be unaware of Trust issues, unaware of ISA allowances, funding limits, carry forward, etc. and all the little things that may trip them up in later years. In any event if cost savings is their main objective then there are channels for them to purchase.
AXA Wealth	What would be of interest to understand, from the category of consumers that make some investment decisions themselves, is, did those consumers first receive advice and as a result become more confident & self -reliant? For example, the initial stocks and shares ISA investment being advised but future top-ups invested without a personal recommendation. If this is the case then the importance of the original recommendation should not be diluted. In addition the move to adviser charging has made the fee more explicit in the eyes of the consumer. This may have had the unintended consequence of putting consumers off.
Barra Gorman	No comment
Berkeley Burke Group (Andrew Emery)	The lack of appetite for "Pension Wise" clearly demonstrates that the public place little, or no value on receiving the half-measure known as "guidance". Unfortunately, those same people do not see the value of financial "advice" either - from any source! As a result of some ill-conceived, poorly designed and hastily introduced recent legislation, it is now entirely possible that the unregulated, unauthorised and potentially unscrupulous "adviser" will hold domain once again in our financial services industry. History will always show that these people have the ability to convince the general public that they, and only they, are capable of turning water into wine and all without any risk whatsoever! Banning the sale of Ucis to Retail Clients is not sufficient to deter this type of "adviser" once the genuine Financial Advisers have been removed from the marketplace - usually by cost. As previously mentioned, the demand for cheaper advice has created the D.I.Y. investor/adviser who is in turn, supported by such websites as MoneySuperMarket and MoneySavingExpert. Once again, the spectre of "unintended consequences" is introduced.
Berkeley Burke Group (Tony Durant)	
Blevins Franks Financial Management	This would depend on how safe it was considered to be for clients, as to whether FOS and the FSCS was available
Blue Scapes	Merely from frequent conversations with friends and acquaintances - financial advisers (independent financial advisers) are, it appears, becoming far more "desirable" as an entity. The old - school, bank advice is no longer either available or trusted by many given 2008 developments. Things have changed over the pst decades!
BPH Wealth Management LLP	No comment

Respondent	Q4: Do you have any comments or evidence on the demand for advice from sources other than professional financial advisers?
Brighton Financial Ltd	Not really. Some clients have taken guidance (such as Pensiowise) and found that to be valuable but we are not aware of circumstances where they have not already sought or want professional advice from an adviser.
Broad Wealth Management Ltd	no
Browning Financial Planning Ltd	no comment
Caleb Roberts Financial Management Ltd	Yes. We should bring back commissioned salesforces. This will incentivise these people to sell products like pension to those who can only afford very modest amounts (50-200 pm) and still be paid for it. It then ensures that at least some level of savings are being made (outside of AE).
Caledonian Financial Management Ltd	no
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	Those consumers looking for information from elsewhere need to be made aware that it is not regulated advice. Consumers are free to seek generic information and guidance on financial matters as make up their own mind. It is different to seeking legal advice, for example, in the sense that financial decisions are often about their own finances and may have little or no impact on others, whereas legal matters are often between other parties involved. The key is to whether a personal recommendation is being sought and if the consumer is willing to pay for someone to give that recommendation regulated advice, as opposed to generic guidance.
Chattertons	No comment
Citygate Consulting Limited	Sadly not, but I do know in ALL the years I have been an adviser I have NEVER met a single person that couldn't have benefitted from speaking with me. Be it something as basic as which debt to pay off first, writing their Will, putting their life cover into trust or more advanced things, such as how to structure a buy to let portfolio, use carry forward allowance etc. There is plenty to advise on.
Close Brothers Asset Management	No comment
Combined financial Strategies ltd	I have seen the number of referrals from other professionals (Accountants and Solicitors) increase exponentially over the last 12-18 months. For your own analyse unbiased.co.uk do many pieces of market research on this type of thing.
Cranbourne Financial LLP	Presumably people are receiving information form newspapers and media sources as well as those in the property industry before making decisions. However this is not professional advice.
D Shearer	Whilst organisations like Citizens advice have been tasked with part of the pensions advice system, they could take on a bigger role. Any impartial organisation offering advice must be seen to be free of the risk of being paid by a percentage of the sales. There must be a model which gives good, impartial advice quickly and at a realistic charge (software based may not be appropriate for all but would at least make basic personalised advice available at a much cheaper cost.
Douglas Baillie Ltd	Yes, we receive a lot of requests for advice from the clients of the accounting and legal professions, and from other adviser firms who do not have the appropriate FCA permissions.
Entrust Financial Planners Ltd	Many consumers may look to their accountant, basically the trusted adviser in their lives. Many consumers have never experienced this trusted adviser relationship due to negative industry comment.
Essential IFA	It is generally recognised that 80% of the UK population under the age of 50 have significant pension shortfalls and little or no knowledge of this shortfall. The level of financial education within the UK is extremely low and often consumers only seek financial advice at times of either financial stress or events like reaching retirement age. It is clear that the vast majority of the population may not need detailed face to face financial advice, partly due to the cost restrictions of receiving such advice i.e. a person earning less than 25,000 per annum would find it hard to justify 1,000 on a detailed financial planning report. It is however still important for this person to still receive some form of financial advice and this is where services like Citizens Advice can play a key part although these services should still have qualified, authorised advisers. The important thing to understand is that these services still have to retain the correct people with the correct qualifications.
Esteem Money Ltd	In the lead up to RDR, we have all become the most qualified advisers this country has ever seen. We have complex financial products and services, taxation and legal systems that we are trained to deal with. Some consumers will take the DIY route, others will follow the media and other spokespeople. Those who want advice should seek it from those who are appropriately qualified. They should be encouraged to do so, and the benefits of using a professional adviser highlighted.
Financial Foresight (NI) Ltd	On-line & decision trees less helpful than face to face that provides "less information from a better source."
Forward Plan IFA Ltd	People often ask their accountants and solicitors for advice
Halebarns Financial Planning Ltd	I pick it up from the press and face to face meetings wwith clients
Hall Financial Planning LLP	no
Highclere Financial Services	No comment
Intelligent Pensions	We believe that there is a demand for guidance (general financial advice) at no cost but as a precursor to professional financial advice where appropriate, with as much knowledge gained at the guidance stages as would make the consumer feel more able to take advantage of professional advice on a cost efficient basis

Respondent	Q4: Do you have any comments or evidence on the demand for advice from sources other than professional financial advisers?
Investec Wealth & Investment	In the less complex areas of financial services such as saving for short term needs there is an argument for a flowchart/mechanised/decision tree process. At the heart of it must be less paperwork, less infrastructure and process requirement and less jargon, all reflecting a lower level of complexity, risk and liability
Iwan Jones	As a Pension a Wise Guider I cannot advise clients. If they want advice I refer them to an IFA. However the IFAs will reject seeing them because their pension pots are too small for them to make it cost effective to deal with that client. This is so frustrating for the client, myself and the IFA who would all like to see a successful outcome.
James Hay Partnership (Janet Morville-Smith)	The requirement to seek guidance has often been seen as a barrier to accessing funds following the introduction of pension freedoms. In addition, many high net worth clients would still consider having an accountant as a form of financial advice. Bringing government organisations into the guidance and even advice marketplace may help to fill the advice gap, however it assumes that the amount of capital/income someone has determines the complexity of financial planning required
John Lord	As a former CAB volunteer adviser, I can confirm that there are people who cannot have access to financial advice owing to lack of understanding and/or cost/risk implications but who seek free advice ??
Jonathan Davis Wealth Management LTD	No comment
Joslin Rhodes Lifestyle Financial Planning	I have focussed my answers on those questions of which I have specialist knowledge and I have no specific comment for this question.
Katy Master	No comment
Lemonade LLP	There is certainly a place for a wide range of information sources but as per question 2 the difference between advice and information could be made clearer with a consistent definition.
Lighthouse Financial Advice	None, as an adviser obviously my clients want to see the most professional person they can, they just want to be able to get that advice at a cheaper cost. Most advisers are not at capacity of work load but just cannot afford to take on small fee cases as the PI not the FCA costs are banded/limited by the fee.
Morgan Financial Ltd	Yes our charity St Lukes Advice Services is under constant demand to help people with their financial issues.
Morgans Ltd	The qualitative element of my research (see above) was conducted on a sample of working age consumers from income quartiles 2 and 3. The characteristics of this sample are broadly similar to the user groups Thoresen identified as potentially vulnerable because of their lack of access to financial advice. This part of my research involved semi-structured interviews with participants from these income quartiles which highlighted the barriers these people had encountered. There were a variety of reasons why some had not taken advice relating to particular areas of their financial planning. These included; not being aware of the potential risk, not appreciating the gravity of the potential risks, a belief they would cope, perceived cost of advice and last but not least, a lack of understanding how a financial adviser can help. On this final point, many consumers perceive regulated financial advice as a product channel rather than a holistic service that can highlight potential risks as well as providing solutions to address these risks. This in itself creates a barrier to advice as whilst the product channel aspect is perceived by the majority as the subjective norm then consumers will not seek pro-active advice to plan their finances they will only seek it when they believe they need to arrange a product. What is required is a trigger to advice the MAS Health-check appears the obvious choice but unfortunately seems to have failed to date. It needs to become the norm for consumers to undergo a financial health-check. This is something the industry, the regulator and MAS need to focus on. It is what individual advisers should be doing with clients (and no doubt many are) but by that stage the consumer has engaged. It is those that don???t engage that need to prompted. I have an issue with your table (p.10) illustrating the complexity of different financial issues. In particular the perceived simplicity of ???protecting against misfortune compared to other issues. Although you suggest that only 11% of respondents expected to need advice regarding protection insurance this is at odds with the ABI statistics that suggest 75% of pension, protection and long term insurance products (66% via IFAs) are sold with advice and 61% of protection products via IFAs. You say (p.21)focus initially on advice in relation to investing saving into a pension and taking an income at retirement I disagree, protection is the keystone to financial planning.
Openwork Limited	As one of the largest Financial Advice networks in the UK with around 3,000 Protection, Mortgage & Wealth Advisers, our capacity to provide advice is far outstripped by the demand coming from consumers. Our advisers are increasingly finding themselves moving upmarket to wealthier customers because that is where demand is strongest and profitability greatest. This naturally leaves a gap further down the asset chain. Customers may well wish to source advice elsewhere, but this is not manifesting itself in a shortage of clients for financial advisers. With fewer than 23,000 and a population exceeding 64m, this is not unexpected. This is exacerbated by a lack of recruits who wish to pursue a career in providing financial advice as opposed to careers in professions such as law and accountancy. Openwork provide a 12 month graduate training programme which enables candidates to gain recognised professional qualifications whilst in parallel working in advisory firms to develop the knowledge and skills required to provide consumers with high quality advice. Consideration needs to be given at a policy level on how to balance supply and demand for advice.

Respondent	Q4: Do you have any comments or evidence on the demand for advice from sources other than professional financial advisers?
Park View FP Ltd	If I understand the question you asking if consumers are using non-regulated advisers. If this is the case then my response would be as an individual I am constantly reading adverts and reading emails offering fantastic non-regulated investments and tax opportunities from probably crooks to be quite honest. This is an area where the regulator needs to be so much more proactive.
PCM Asset Management Ltd	Technology may have delivered a route to advice, that makes it cheaper for firms to deliver it, and therefore the public can access it cheaper.
Penguin	No comment
Polygon Financial Ltd	No.
Profile Financial Solutions	No comment
Prosperity Wealth Management Limited	No comment
Protection & Investment Ltd	No comment
Richmond House Group	No
Rob Coote	No
Rowley Goodall Ltd	See Q5
Royal Mail	This is not a topic on which the Keep Me Posted campaign is able to provide a response.
Simplified Money Ltd	No comment
SK Financial	Yes. I am part of a study group made up of 25 people from my profession and we always say that the issue is not lack of clients its lack of adviser numbers. The investment and pension firms that we provide business to regularly tell us that the majority of their business comes from the intermediary market place. There is a popularity in the "DIY" investor. The characteristics of this type of investor tends to be someone who has the knowledge and the conviction to follow through on their particular investment objective. This does not tend to be a popular avenue for the masses.??
South West Financial Planning	Demand has increased for advice particularly in the light of pensions freedom. Also, as a result of the diminishing pool of advisers. Advisers retiring, leaving due to the regulatory burden. Unless the regulatory costs and burden is not held in check, the advice sector will not be able to meet the demand for advice.
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	Make CMCs subject to the same regulation as I am
Dean Robertson	I do feel that there should be a de minimis level put in place, for both advice fees charged and for levels of investments where a simpler process could be allowed, face to face though.
Sussex Independent Financial Advisers Ltd	na
Swallow Financial Management LLP	No, although there's always some one down the pub for them to talk too!
Taurus Global Financial Advisers Ltd	Conversations with clients about pensions freedom and how it impacts them. When costs are discussed they say sorry can't afford them
The Minster Partnership llp	Accountants and solicitors still do not appreciate the added and unique value IFAs bring
Tom Orchard (Annetts & Orchard)	I do feel that there should be a de minimis level put in place, for both advice fees charged and for levels of investments where a simpler process could be allowed, face to face though. The world is currently full of films of a dystopian nature where everything goes wrong due to over reliance on computers and technology. Rightly so in my opinion. To allow and promote robo-advice as a replacement will be a disaster at some stage in the future. History is littered with examples where something just cant go wrong, recent financial services examples have been the securitisation of junk debts (which suddenly became AAA rated due to fool proof computer algorithms) and of course the LTCM disaster in the 90s. All of which were proved to be perfectly unbreakable, right up to the moment they broke.
True Potential Wealth Management	No comment
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	No
Wishart Wealth Management Ltd	Seems many consumers go to their current product provider to give good advice but reality is they are restricted and rarely know their customer well enough. Insurers are fighting shy of giving advice after they were hammered for previous advice failings when fined heavily for pension transfer review parts 1 and 2. Creating the Money Advice Service and Pension Guidance has been a costly failure thus far based on numbers using these services (but their creation and promotion makes Government look like they are doing something plugging advice gap). Consumers going to these websites/helplines may end up better educated (or more confused). They don't actually get a solution to their needs.

Respondent	Q5: Do you have any comments or evidence on the financial needs for which consumers may seek advice?
2plan wealth management Ltd (Chris Smallwood)	There are around 22,000 financial advisers. NMG Q2 Financial Adviser Census says that on average advisers have 136 active and 92 reactive clients. That would suggest that 3 million people are currently clients of a financial adviser and that another 2 million have sought some advice in the not too distant past. We would expect active clients to have sought holistic planning and investment advice.
Abi Stidworthy	Short term cash savings and short term unsecured loans are the domain of banking and does not need a regulated financial adviser . The same applies for general insurance products. Debt management is unlikely to be referred through a professional financial adviser
Active Wealth Ltd	Pensions changes. This is the majority of enquiries.
Advantage IFA Ltd	Quiet often people don't realise when it is most important for them to seek advice. Taking benefits at retirement is now well highlighted but people do not generally seek advice when a relative requires long term care, when they have a baby or when they have a significant change in circumstances. People do not recognise when advice is required and why it is important.
Alison D M Segerman	The poorest and least-educated people are those most in need of advice
Amar Financial Services	● Promote proper client focused labelling of what is guidance, but not advice, and what is advice – consumers remained confused. ● Proper promotion of independent advice – the benefits of using an independent financial adviser. Fragmented trade bodies appear unable to do this effectively. Planning should be considered in the same light as an MOT for the car. Only once a year, nothing might need to be done, and if it does, then up to the client as consumer to decide whether to proceed or not. ● Financial education in schools. ● Publicity for the benefit of advice and the good news associated with planning. Media education that independent advisers offer a different service to those offered by banks in the advice sector. ● Simplify the products and the regulation that covers them. The constant obsession by governments to introduce new rules for pensions and ISAs mean that the consumer does not acquire a working knowledge of these two main means of saving. The rules for both must be reduced, must be fair so that genuine errors – especially in relation to pensions - are not penalised severely. It might also be a chance for the FCA to examine proposals for new products before they are marketed. Back in 1997 "Which" recommended that the focus of regulatory attention should be on the product rather than the advice. This advice was ignored by the government of the day, which preferred to place the onus for failed investments on the shoulders of the adviser. However, it is the product that makes the money, and not the adviser. So back to basics: what about an insurance policy by all product advisers to ensure that the consumer is protected in the event that the product failed? Consumers would then be able to choose products that were insured and perhaps choose to avoid the uninsured ones, which would be treated as "relatively high risk". ● Promote transparency of the product apply a guide like T.E.R. ● Reduce the paperwork needed for basic advice ● Inform FOS that there is such a thing as Limited Advice ● Consider reintroducing choices of remuneration including commission payments on all business. Whilst it is unlikely that clients now on a fee basis would switch back, it may encourage those less well affluent to seek advice, knowing that there is not likely to be an immediate up-front cost to them. Why not simply have fixed commission rates that apply to all institutions and insurance companies. If the consumer pays fees to the adviser the commission can be rebated.
Anne Rodger	pensions, investments such as ISAs - basic products but the average person does not have access to anyone who is familiar with their financial affairs, to advise other than their own bank
Apex CB Financial Planning Ltd	We are being approached regularly for advice on releasing pension. Probably one new enquiry per week.
Aspire Online	Our experience tells us that once an individual works with us on particular aspect of their financial planning and then trusts us we will inevitably look at all aspects of their needs from basic cash ISA's to IHT planning and ensuring they have an up to date Will.
AXA Wealth	AXA Wealth agrees with the principle that a consumers needs change over time and that those needs fluctuate in complexity.
Barra Gorman	Mostly with large monetary value decisions such as pension or inheritance or with complex technical i.e. long term care, trusts

Respondent	Q5: Do you have any comments or evidence on the financial needs for which consumers may seek advice?
Berkeley Burke Group (Andrew Emery)	Recent history has clearly shown that consumers do not value anyone's time but their own. The appear to believe that they know exactly what they want (when, in all probability, they don't) and they know what to do about getting what they want once that they have been pointed in a general direction (again, in all probability the really don't know). The enormous issues attached to the re-education of the consumer must be undertaken by those who have created the problem - the regulators and the consumer watchdogs. The cost for this re-education must be met by the same organisations and cannot be 'passed-on' to the financial services community at large. It may be useful to remember for future legislative introductions that "a little knowledge can be a dangerous thing" and that is precisely what the general public now has! On a positive note, the development of "robo advice" should facilitate a more disciplined D.I.Y. investor/adviser although it will be interesting to observe how the consumer bodies such as the Financial Ombudsman Service apportion the blame when "robo advice" fails for whatever reason - I am sure that the FOS will find a way to blame the Professional Financial Adviser even though he wasn't involved anywhere in the process!
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	No comment
Blue Scapes	Retention of assets for retirement in order to assist survival. Retention / growing of assets to service care in later life. Building of assets for passing to children / grandchildren. Building / retention of asset value for assisting children with living expenses (rent etc) and - for some - gifting for 1st house purchases. Investing.
BPH Wealth Management LLP	No comment
Brighton Financial Ltd	Given the new pension freedoms, many consumers seek advice in order to access their pension funds. This is by far the highest proportion of enquiries we receive.
Broad Wealth Management Ltd	areas consumers are seeking advice - retirement planning especially new pension freedoms investment advice mortgage advice protection advice
Browning Financial Planning Ltd	no comment
Caleb Roberts Financial Management Ltd	Unsecured debt Mortgage Pensions Investment Dealings around death
Caledonian Financial Management Ltd	It is my opinion that most people seek advice regarding their mortgages and now pensions because of the rise in advertising of the pension freedoms. Then there appear to be another segment of people that seek financial advice regarding their affairs in general. I think this is again, because there if not enough done to highlight the benefits of receiving sound financial planning throughout your life.
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	No further comment FAMR CfI Oct 2015 document covers the various needs for consumers.
Chattertons	We are a legal firm with 100 legal professionals, in house IFAs and accountants. We have plenty of data that we could discuss; however I will not discuss our data on an unsecure online form. Advice is normally sought, in general; for pensions; tax planning and; life event planning. Other services are more suited to brokerage - for life insurance most people just want the cheapest appropriate cover, for mortgages most people want the cheapest appropriate mortgage. People will use advisers, but don't really want the advice.
Citygate Consulting Limited	As above, the majority of people are under insured and do not write their Will. These are some of the most basic things to be done.
Close Brothers Asset Management	na

Respondent	Q5: Do you have any comments or evidence on the financial needs for which consumers may seek advice?
Combined financial Strategies ltd	at the moment the majority want: - to know they are not missing out on opportunities - a safe pair of hands to help guide them through the legislative quagmire of financial advice and products - peace of mind that they have a chance of getting the lifestyle they want In terms of topics most are: - Pre -Retirement - Building up assets and paying off debt - At-Retirement - How and when can they stop work - Retired - Do they have enough, how do they help the next generation?
Cranbourne Financial LLP	No comment
D Shearer	In my experience most people have no idea of the need to have an emergency fund, not to spend all of their income on current consumption, and to plan ahead for income in retirement.
Dean Robertson	The regulator should introduce de minimis rules to allow the systems and processes at the lower scale of these areas to be in place, to allow advisers the opportunity to allow quality advice but at affordable prices, as they are not having to lay out so much in compliance and regulatory costs and having to add a risk premium for fear of future reprisals or expenses. The best solution to any of these areas is Adviser-Lite, way above any other alternatives.
Douglas Baillie Ltd	Consumers have a multitude of needs. However in my experience, they are simply not willing to pay for advice in advance of knowing the outcome of it!
Entrust Financial Planners Ltd	I believe that the FAMR Call for input document has correctly identified these
Essential IFA	There is a massive increase in people seeking advice in the area of pension freedom which represents both a positive and negative effect on the practice. There is a considerable mismatch between client expectation and adviser delivery as advisers are duty bound to point out all pitfalls of pension freedom which often leaves consumers disappointed and feeling that barriers are being put in their way. This is made worse by the government and media attention to pension freedom which is often broadcast with little or no thought to the consequences.
Esteem Money Ltd	Pensions Freedom has highlighted the need for advice, the implementation of guidance through Pension Wise seems to be a failure as more investors have gone straight to their providers and taken the money. Many mistakes have probably been made, and too much tax paid. Cutting advisers out of the process has devalued our industry, and only encouraged scams. Auto-enrolment is another area that requires advice if the take up is to be encouraged with small businesses, as many businesses find this daunting and do not understand it, despite the TV ads. Frontline Advisers are the best people to provide the support and advice clients need, and should be more involved in the design of the delivery process.
Financial Foresight (NI) Ltd	Full range - pensions now topical
Forward Plan IFA Ltd	There is a very wide range of areas that consumers need advice on and often they think they need advice in one area, but in reality need it in another. at the moment many are looking for advice in drawing pensions, but often need advice in building pensions or investments for the future. Also they seek advice following what they have seen on TV or read in papers
Halebarns Financial Planning Ltd	Mortgages and pensions are the two main needs as far as I can see. Protection of their wealth is a key need.
Hall Financial Planning LLP	The long term saving market is declining. There is little is any incentive for advisers to encourage younger clients to save as the fees would be prohibitive.
Highclere Financial Services	It needs to be accepted that consumers are generally unaware of their options in terms of products and the subtleties within those products. Pension freedoms, annuity purchase, fund choice, critical illness insurance, income protection variations are all examples of where consumers doing it themselves is likely to end in dismay or disaster.

Respondent	Q5: Do you have any comments or evidence on the financial needs for which consumers may seek advice?
Intelligent Pensions	As indicated in Q3, pension planning is a key area, however we feel that achieving member engagement during the accumulation phase is a big problem and that where possible the government should support and encourage employees to take a greater interest in their retirement provision. Unfortunately many employees are simply not saving enough and there needs to be a change of culture, which I believe needs to be driven by the state with the support of the industry by having greater clarity on the basis on which general or professional financial advice can be safely provided, within current rules.
Investec Wealth & Investment	If one way of quantifying the value of professional financial advice is the cost of getting it wrong, possibly above a certain deminimus level, then everything from protecting against disability, loans, financing a house purchase and saving for retirement would require advice at an appropriate level. More complex (high level) advice is required where there is a need to identify and analyse the impact of various strategies as they change over time. In addition the financial impact of poor decisions will be greater here.
Iwan Jones	Consumers need advice on all aspects of finances. From savings , investments, pensions , mortgages , loans and debt, life assurance and wills Having been a bank manager (the old sort who could give a decision on matters e.g giving a loan without having to rely on a computer decision) , to being an IFA , to being an Independent Mortgage adviser , to a Building Society Manager and now to my present role, I have seen so many instances of people needing advice. However over the years advice has become harder to get as advisers become more and more fearful of the regulations linked to the industry. This needs to change in order for all consumers to be able to turn to someone for advice
James Hay Partnership (Janet Morville-Smith)	As above, but it assumes for example that a client with 250,000 requires detailed retirement planning, whereas someone with 25,000 should just buy an annuity, or take their funds out in full. Whereas the risks to the individual and/or the State from the latter making poor decisions are considerably higher. Customers seek advice at key milestones within their lifecycle, for instance, saving for a wedding, saving for a childs education fees, buying a home, retirement planning, death planning (IHT, Trusts etc.) This is not driven by wealth, accumulation, decumulation and providing for loved ones on the death of the customer applies to everyone, however not everyone seeks such advice and this goes back to previous responses, it either comes down to cost or the consumer thinks they know what they need and doesnt consider they need any advice.
John Lord	People require advice regarding many aspects of finance including insurance, pensions, banking and even simple low level investing. Independent ffree advice is very hard to find
Jonathan Davis Wealth Management LTD	No comment
Joslin Rhodes Lifestyle Financial Planning	Most clients, when counselled and explored carefully have two big questions. Do I have enough? and Will I always have enough?. These are particularly prevalent with pension and retirement planning however the questions tend to be buried under technical preconceptions.
Katy Master	No comment

Respondent	Q5: Do you have any comments or evidence on the financial needs for which consumers may seek advice?
Lemonade LLP	Financial education would help people understand when financial advice could be beneficial and when it may not be. Larger employers are starting to see the benefits of offering financial education to their staff. Perhaps this could be encouraged
Lighthouse Financial Advice	Pre and post retirement planning is mostly what I get asked about so only circumstantial evidence
Morgan Financial Ltd	People need help with so many aspects of their positions. As a working adviser I am constantly having to explain to people I do not advise on just debt because there is of course no profit in it. Also people's behaviour and perceptions about their financial needs and financial positons are often dangerously skewed. Who is meant to 'unskew' the mess.
Morgans Ltd	The quantitative element of my research shows the different reasons why participants took advice. However, this is not a representative sample of the population. I have included a couple of charts that illustrate my findings regarding use of advice by income and another which shows my interviewees reasons for not taking advice. more detail is available in the accompanying thesis.
Openwork Limited	We have no particular comment to make on this point.
Park View FP Ltd	Most HNW individuals I believe do value the need for professional financial planning including the need for a lifetime financial plan being in place before any specific recommendations are made. We work in a holistic manner with our clients and advice on all areas of planning.
PCM Asset Management Ltd	No- that will not have changed, in the short, medium or long term
Penguin	Those with old products - mainly with profit investments - desperately need advice - there needs to be something coming out from somewhere - whether that be the regulator, MAS, CAB or the profession - about the different areas where people need advice. From protecting young families to retirement planning to wealth protection for those who have put themselves in that position
Polygon Financial Ltd	Unchanged.
Profile Financial Solutions	No comment

Respondent	Q5: Do you have any comments or evidence on the financial needs for which consumers may seek advice?
Prosperity Wealth Management Limited	The vast majority of our clients are interested in inter generational planning having clear investment strategies across multiple financial services products to deliver holistic wealth management outcomes. This includes income for life and inheritance tax planning.
Protection & Investment Ltd	Generally, you are right, in that consumers with more complex needs are those which will seek advice. However, practical experience shows that many people still need help with the basics saving an adequate emergency fund, protection (even obvious things like the mortgage) and dealing with debts etc. Unfortunately the high cost of advice means this is often out of reach for many consumers or advisers make a financial loss providing this type of advice.
Richmond House Group	The biggest demand is for pensions advice due to their complexity. However, many firms are refusing to offer advice on pension freedoms as it is litigation waiting to happen. Advisers have shifted their business models to a more professional long term relationship basis. Someone wanting to cash in their pension pot is unlikely to fit that model and be more likely to make a claim when they realise their mistake.
Rob Coote	As mentioned before I believe that consumers as they get into their 50s start wondering about what live will look like when they stop working
Rowley Goodall Ltd	I have advised on group company pension schemes for the past 20 years and in this time have met well over a thousand members in one to one meetings. More recently I have not offered professional advice to members, only help in understanding the following: Mostly they look for two types of help: 1. In addition to their current scheme, they need an understanding (not advice) of their previous pensions, either personal or final salary. 2. Basic life insurance and income protection if not provided by their employer.
Royal Mail	The Keep Me Posted campaign would agree with the research from NMG consulting, referenced in the review paper provided by the FCA, that many consumers make use of financial advisers when seeking advice about starting a pension or retiring. As a result, a significant proportion of these consumers are drawn from groups with limited access to non-traditional communications platforms. Consequently, we would note the importance of ensuring that those seeking financial advice are able to access this through traditional media, including hard copy mail.
Simplified Money Ltd	No comment
SK Financial	Yes. Consumers are still used to seeking advice on their financial needs from banks and larger sized firms. The lack of advisers and the associated costs with financial advice makes it harder for them to obtain advice. Consumers are not used to paying for financial advice so this is a large hurdle for many of them to overcome.
South West Financial Planning	Clients tend to be reactive in seeking advice. Triggers such as mortgage need, retirement and tax year start/end. Once engaged they tend to be receptive to an ongoing service.
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	No comment
Sussex Independent Financial Advisers Ltd	na

Respondent	Q5: Do you have any comments or evidence on the financial needs for which consumers may seek advice?
Swallow Financial Management LLP	We have always had requests for help from individuals who want help with mortgage borrowing, further advances, changes to their mortgage terms (cap repay to interest only/interest only to cap repay) extending their term/ imposing their own repayment schedule on the term. Borrowing into retirement, equity release et al. People wanting to obtain better investment returns than offered by deposit based investments. People wanting to access their pension benefits either via PCLS or (as was annuities) pensions freedoms. It is very rare that we set up any regular premium business in any areas of finance as the clients are not prepared to pay the costs for the advice!
Taurus Global Financial Advisers Ltd	Pensions freedom is the burning topic everyone has as it is in all the financial pages of the press each weekend.
The Minster Partnership llp	Retirement planning is still a very grey area for most people
Tom Orchard (Annetts & Orchard)	Short term cash savings and short term unsecured loans are the domain of banking and does not need a regulated financial adviser to be involved as generally, that is not cost effective unless part of a bigger picture. The same applies for general insurance products. Debt management is unlikely to be referred through a professional financial adviser ordinarily, as the fees may be deemed inappropriate, so would best be served via CAB, maybe with the adviser community offering to assist at these centres as part of their pro bono efforts. But life assurance, pensions, mortgages and investments should be dealt with by a professional adviser. The regulator should introduce de minimis rules to allow the systems and processes at the lower scale of these areas to be in place, to allow advisers the opportunity to allow quality advice but at affordable prices, as they are not having to lay out so much in compliance and regulatory costs and having to add a risk premium for fear of future reprisals or expenses. The best solution to any of these areas is Adviser-Lite, way above any other alternatives.
True Potential Wealth Management	I feel that the defined benefits pension market needs to be looked at, why should a client who has a guaranteed salary of ??17,000 with spouse benefits of only two thirds guaranteed income or a pot of ??702,000 with 100% death benefits tax free to spouse or children have to take advice from a G60 specialised adviser and incur advisory costs. It is a no brainer for this client to take the pension pot!! I have seen many occasions where the client is being disadvantaged by taking the advice when clearly the obvious option would be to transfer and enjoy the pension freedoms on offer with the flexibilities this brings. We seem to want to give the client the Pension Freedoms but still work pre pension freedoms for fear of reprisals/fines from the regulatory bodies.
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	No
Wishart Wealth Management Ltd	For non public servants, gone are the days when you stay with one employer who 'wet nurses' the employee and their finances all their working life and beyond. Many consumers are confused - they may have assets/income but have no idea what it all means. They need to know they will be ok and not run out of money in their lifetimes. That's where proper financial planning comes in - but genuine, quality comprehensive financial planning it is unaffordable to all.

Respondent	Q6: Is the FCA Consumer Spotlight segmentation model useful for exploring consumers' advice needs?
2plan wealth management Ltd (Chris Smallwood)	No comment
Abi Stidworthy	Yes, there is massive lack of education around financial products and simple basic financial maths for use in the big wide world should be taught to children...compound interest, borrowing and the risks...how to save..etc .
Active Wealth Ltd	Possibly
Advantage IFA Ltd	Not especially
Alison D M Segerman	Yes
Amar Financial Services	No comment
Anne Rodger	dont know what this is
Apex CB Financial Planning Ltd	Yes
Aspire Online	I'm not sure, the breakdowns are fascinating, but the IFA's will target the obvious sectors, certain segments couldn't afford IFA's and IFA's couldn't afford to service them anyway
AXA Wealth	Whilst at AXA Wealth we have developed and operate our own segmentation model, which can be mapped across to the FCA consumer spotlight model, it is beneficial to have a standard segmentation model for this exercise & agrees to the consumer spotlight model.
Barra Gorman	na
Berkeley Burke Group (Andrew Emery)	No comment
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	No comment
Blue Scapes	No comment
BPH Wealth Management LLP	No comment
Brighton Financial Ltd	It's a very useful tool for identifying the potential needs and issues facing consumers and, in our view, represents an accurate reflection of the characteristics of different groups of consumers.
Broad Wealth Management Ltd	No comment
Browning Financial Planning Ltd	no comment
Caleb Roberts Financial Management Ltd	Definitely
Caledonian Financial Management Ltd	I have never heard of this.
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	The 10 segments are useful in identifying different groups of ???needs???, but does not cover those who may be vulnerable due to protected characteristics, such as age (very young and elderly) or those with reduced mental capacity.
Chattertons	It is an interesting source of data, the website is a little slow and unresponsive at times. I'm not quite sure how it helps us as all of our advice is completely bespoke and we try not to run strict models of advice as everyone is different. I think the data actually proves this - there are general rules and there are always outliers - even within the segments. Devising segmented rules therefore doesn't work appropriately for all those within the segment.
Citygate Consulting Limited	I must admit I haven't seen it. I segment my clients by the service offering they wish to pay for or not as the case may be.
Close Brothers Asset Management	na
Combined financial Strategies ltd	Not particularly. I find that I am closer to the consumer and tend to get a far better and more up to date idea of what prospective and existing clients need and want directly.
Cranbourne Financial LLP	No comment

Respondent	Q6: Is the FCA Consumer Spotlight segmentation model useful for exploring consumers' advice needs?
D Shearer	I have never heard of this (and I do try to keep up!) Just looked at it and the groupings do have some merit but obviously ignore segments who are unable to even consider saving or advice as the level of benefits (whilst designed to encourage them into work) are the only income they will ever receive.
Dean Robertson	no comment
Douglas Baillie Ltd	No. It has been prepared without fully understanding the causel links between the perceived and the actual neds for advice. That occusr because consumers' situations are always personal to their own circumstances and cannot be segmentd.
Entrust Financial Planners Ltd	Yes, see above
Essential IFA	I do not believe that segmentation models are useful as often clients needs are unique and in fact segmentation runs the risk of mis-advice and can be a particular problem in the area of robotic advice. What happens when the model is wrong should be the question that is asked when creating segmentation or different models. If you have a million clients earning less than ??25,000 per annum and holding less than ??50,000 in investments, are you really saying that all of these customers should be treated in the same way? If so, why? Segmentation has limitations and inbuilt dangers, if used without caution. Just as selling PPI insurance without checking a client???s circumstances did in the PPI scandal.
Esteem Money Ltd	Clients come in all shapes and sizes; depending on location, socio-economic circumstances will differ from practice to practice. We believe that when we meet a client for the first time we do not have any pre-conceived ideas about them, and not try to shoe-horn them into a ??best fit for segmentation purposes.
Financial Foresight (NI) Ltd	No
Forward Plan IFA Ltd	no as it is too generic. Clients and their needs are individual
Halebarns Financial Planning Ltd	Don't know. have not come across it.
Hall Financial Planning LLP	No comment
Highclere Financial Services	Absolutely not! Indeed, it has had precisely the opposite effect. We now have 10 'pigeon holes' and human nature being what it is, dictates that we must put the client(s) that is in front of us, into one of those 'pigeon holes'. This is a recipe for future problems and the parallels with investment model portfolio's should have been considered before its introduction. This is the skeleton for "robo advice" and the model for such advice will always be restricted, or limited, as it cannot accommodate the "soft facts" that only human interaction appears to be able to offer.

Respondent	Q6: Is the FCA Consumer Spotlight segmentation model useful for exploring consumers' advice needs?
Intelligent Pensions	This is a reasonable segmentation model, although the reference to confidence on financial matters doesn't necessarily extend to retirement planning, especially due to the complexity of rising life expectancy and low interest rates, and the impact on these factors on the level of funding needed to achieve a satisfactory retirement income. A simple method of assessment of funding requirements would help greatly, an example of which is the BlackRock CORI indices recently introduced to the UK.
Investec Wealth & Investment	Here is the answer for 6 and 7: Traditionally the wealth management sector will target the busy achievers upwards up to and including retired with resources. Pre RDR many advice businesses will also have embraced stretched but resourceful but tended to avoid the first four categories as these categories would tend to value advice less and will believe they have less need for it. It would be interesting to explore which category people think they themselves fit into compared to how the FCA or wealth management industry would segment them. In terms of the advice gap, the first four categories are the ones who are disenfranchised from professional advice and they are probably not able or do not have the time or opportunity to make informed financial decisions on their own.
Iwan Jones	Too complicated. You need to to keep things simple.
James Hay Partnership (Janet Morville-Smith)	No comment
John Lord	No comment
Jonathan Davis Wealth Management LTD	No comment
Joslin Rhodes Lifestyle Financial Planning	I have focussed my answers on those questions of which I have specialist knowledge and I have no specific comment for this question.
Katy Master	No comment
Lemonade LLP	Yes - as financial education should also be similarly targetted
Lighthouse Financial Advice	its one way of many to segment the advice categories.
Morgan Financial Ltd	No not really.
Morgans Ltd	Yes, clearly different groups have different needs at different stages of the life cycle but a better understanding of what advice is and how it can help is the key issue. Perhaps there is a need to market advice services to different groups in different ways. If consumers perceive regulated financial advice as something for people who have money to invest then those with no money to invest will see no need for it. When in reality these may be just the people that need advice to highlight the risks to which they are exposed in the event of illness or premature death.
Openwork Limited	It is helpful to enable a cross-industry approach to discussing similar concepts. As a business that advises mass market customers, it broadly matches the sorts of customer we would engage with.
Park View FP Ltd	Not really I feel that each client is so individual to try and box into a category is very difficult.
PCM Asset Management Ltd	Don't know.

Respondent	Q6: Is the FCA Consumer Spotlight segmentation model useful for exploring consumers' advice needs?
Penguin	To an extent but the whole paper pushes protection out of the limelight and people need advice, and even selling, in this area. We need to find a way to help the lower reaches of this model - even if it means bringing back commission. The easiest way to have made commission work would have been to make all providers pay the same standard commission so that people can get advice and advisers can get paid - even if a new range of adviser was created in this arena to support those areas.
Polygon Financial Ltd	Not at all.
Profile Financial Solutions	No comment
Prosperity Wealth Management Limited	From our perspective we do not believe this is useful model.
Protection & Investment Ltd	No comment
Richmond House Group	No view
Rob Coote	Yes
Rowley Goodall Ltd	No comment
Royal Mail	We believe that the FCA Consumer Spotlight segmentation model successfully identifies a broad range of consumer groups making use of financial advice services. However, the Keep Me Posted campaign would like to highlight that the segmentation does not make specific reference to those without ready access to digital platforms, either as a result of socio-economic factors or due to other personal circumstances. Because of this we would recommend that model be reviewed with a view to making direct reference to these groups, which include some of those in most need of financial advice.
Simplified Money Ltd	No comment
SK Financial	Its a start however what percentage of consumers are aware of this? I think more can be done to improve the communications on this and other messages. It needs to be cleaner, concise, catchy and challenging.
South West Financial Planning	Yes I believe so. Useful to me.
Strategic Investment Solutions Ltd (Chris Kilner)	
Strategic Solutions (Michael King)	No comment
Sussex Independent Financial Advisers Ltd	na
Swallow Financial Management LLP	No idea!
Taurus Global Financial Advisers Ltd	No.
The Minster Partnership llp	I do not know
Tom Orchard (Annetts & Orchard)	Yes, however the general public need more education on what is a discretionary spend and what should be a priority, I get fed up of people saying it???s so hard to save when they all have brand new phones / tablets / computer gaming consoles as soon as latest editions are released, visit a Starbucks every day, drive new (leased) cars etc. That is down to a massive lack of education and still goes on this day. Schools should have IFAs teaching weekly sessions to inform the students what needs to be a priority in life and the positive (and negative) effects of compound interest.
True Potential Wealth Management	In a word NO, I would never categorise clients as mature and savvy ??it sound horrendous and not professional. Clients are clients all have different needs, goals and requirements and all should be treated as individuals not categorised.
Waghorn	No comment

Respondent	Q6: Is the FCA Consumer Spotlight segmentation model useful for exploring consumers' advice needs?
Whiting & Partners Wealth Management Ltd	No
Wishart Wealth Management Ltd	Marketing people love to put everyone in a segment. Trouble is this approach pigeon holes consumers. Too generic. But you need to start somewhere. To suggest all retired with resources are risk adverse is plain wrong. Many built their wealth being 100% equity investors. I'd suggest no quality UK financial advice brand or adviser/planner can work at a profit with the following groups (and they don't need): Living for now Starting out Hard pressed Stretched but resourceful

Respondent	Q7: Do you have any observations on the segments and whether any should be the subject of particular focus in the Review?
2plan wealth management Ltd (Chris Smallwood)	No comment
Abi Stidworthy	Education of society should be aimed at younger groups of people.
Active Wealth Ltd	No
Advantage IFA Ltd	Too many segments. You could broadly split the segments into those that require debt advice and how best to manage income and expenditure. those who require advice on building up assets and protecting what they have. those who have existing assets and want to make better or different use of them.
Alison D M Segerman	Provision of advice to adults to be supported by education in financial matters, both for adults and children/teenagers
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	No comment
Aspire Online	Now that commission is banned how can it be possible to serve starting out, living for now, hard pressed and striving and supporting, these are the people that I think need us most but can least afford to pay us, we act as their "conscience", encouraging them to save, buy protection, invest in pensions. They can least afford to write us a cheque and even if they can, it is never normally enough to cover our time for what they consider they ought to pay for advise
AXA Wealth	Its not just about identifying which segments to focus on as each has a different requirement. For example, you could argue that Hard Pressed and Striving & Supporting need guidance and information on basic saving and managing debt. These services already exist and at this point they dont need a personal recommendation. Stretched but Resourceful & Busy Achievers have reached a position where regulated a personal recommendation might be of value but for whatever reason they arent getting it. Possible reasons include access, inertia, and cost.We agree that initially it would be most beneficial to focus on segments that are the less well served, but it should be recognised that there are access and engagement challenges present in all the segments.
Barra Gorman	No comment
Berkeley Burke Group (Andrew Emery)	Stretched but resourceful and busy achievers constitute 10 million, both have pensions, investments and savings, perhaps s mortgage, but are "time poor". This category require advice and/or guidance which is easily consumable and time efficient. Full (professional) financial advice is both financially and time resource, expensive. Living for now and Starting out both share factors such as; they are working and are technologically savvy, but may lack engagement in financial advice. Whilst the need is not urgent they should be encouraged to engage and trust to see the merits of financial advice when it is needed. These segments constitute 13 million. Retired on a budget - definite need for financial advice but possibly constrained by social dislocation caused by lessened mobility and/or finances, but also a lack of access and "know how" regarding technology. Perhaps this segment of 4 million would be better served by the "Pension Wise" experience, or something similar that is more readily accessible than the more mainstream alternatives? Once again, this demonstrates that segmentation belongs to "robo advice" and that it could be useful if the "self-sufficing" advice process (see Q.2) is developed. The "self-sufficing" advice process could deliver a form of advice to the mass market although it must be emphasised that it will only work with the expensive (??cost and time resource) safety nets of FOS/POS/FSCS being removed as an option.
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	No comment
Blue Scapes	No comment
BPH Wealth Management LLP	No comment

Respondent	Q7: Do you have any observations on the segments and whether any should be the subject of particular focus in the Review?
Brighton Financial Ltd	Those categories where professional advice could be valued by the consumer but where they may not have sufficient resources to pay for face-to-face advice. RETIRED AND ON A BUDGET LIVING FOR NOW STRIVING & SUPPORTING STARTING OUT HARD PRESSED STRETCHED BUT RESOURCEFUL
Broad Wealth Management Ltd	No comment
Browning Financial Planning Ltd	no comment
Caleb Roberts Financial Management Ltd	The segments need access to different forms of financial advice, e.g. retired on resources, affluent and ambitious, mature and savvy, and maybe stretched but resourceful are already being serviced by the existing fee based financial model successfully and this should continue to be the case. Retired on a budget, striving and supporting and hard pressed need a basic level of advice, e.g. help with cashflow and using Uswitch, etc, to help save money with household bills. This form of advice should be via Jobcentres, Community Hubs and charities and should not be funded by current financial advisers in any way.?? The remaining categories can be serviced by technology for some products, e.g. life cover but would probably benefit from a commission based salesforce.
Caledonian Financial Management Ltd	No comment
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	All these segments should be included in the review as the focus should be on how all people can access both financial guidance and regulated advice in their own segment of financial need. Must also cover vulnerable clients.
Chattertons	All should. Those able to afford advice should be given the assurance from the regulator that their adviser is completely unbiased. Those that cannot afford advice should be given the assurance that their broker at the bank will arrange something that is appropriate
Citygate Consulting Limited	See above
Close Brothers Asset Management	No comment
Combined financial Strategies ltd	No comment
Cranbourne Financial LLP	No comment
D Shearer	No comment.
Dean Robertson	no comment
Douglas Baillie Ltd	Not really: I think that and new focus should differentiate between simple product solutions such as basic savings, including ISAs, and more complex products such as pensions, annuities and income drawdown where the advice is far and away more technical and in need of expert advice such as a 'pension transfer specialist'.
Entrust Financial Planners Ltd	It is not the segments that should be focussed upon, but the barriers that exist to all of these segments (cost and perception). I believe financial education should be compulsory on the National Cirriculum from the age of 14 to 18, which would help eradicate many of the current problems.
Essential IFA	No I do not.
Esteem Money Ltd	None
Financial Foresight (NI) Ltd	Our segmentation would in no way reconcile to the spotlight segments, so would not be easily focused if used in the review.
Forward Plan IFA Ltd	Do not judge who would want to use an adviser. I have seen many who would not be traditional advice clients, but pay fees to receive advice as they believe in the value
Halebarns Financial Planning Ltd	No comments
Hall Financial Planning LLP	No comment
Highclere Financial Services	No comment

Respondent	Q7: Do you have any observations on the segments and whether any should be the subject of particular focus in the Review?
Intelligent Pensions	We believe that the greatest potential impact is in the middle income categories, where state pension provision would make up less than half their income needs in retirement.
Investec Wealth & Investment	Here is the answer for 6 and 7: Traditionally the wealth management sector will target the busy achievers ???upwards??? up to and including retired with resources. Pre RDR many advice businesses will also have embraced ???stretched but resourceful??? but tended to avoid the first four categories as these categories would tend to value advice less and will believe they have less need for it. It would be interesting to explore which category people think they themselves fit into compared to how the FCA or wealth management industry would segment them. In terms of the advice gap, the first four categories are the ones who are disenfranchised from professional advice and they are probably not able or do not have the time or opportunity to make informed financial decisions on their own.
Iwan Jones	Not at this moment
James Hay Partnership (Janet Morville-Smith)	No comment
John Lord	no comment
Jonathan Davis Wealth Management LTD	No comment
Joslin Rhodes Lifestyle Financial Planning	I have focussed my answers on those questions of which I have specialist knowledge and I have no specific comment for this question.
Katy Master	No comment
Lemonade LLP	No comments
Lighthouse Financial Advice	Yes its feel the busy achievers, affluent and ambitious, mature and savvy, retired with resources are all well catered for in the current regime and they are the clients we all seek. Its the poorer and less affluent that one could argue require advice more, are those that cannot afford it under the current schemes.
Morgan Financial Ltd	You cannot bang human beings into a hole. Each person is an individual and needs to be treated as such.
Morgans Ltd	no comment
Openwork Limited	The first few categories (Starting Out, Living for Now, Hard Pressed) are the least well served by the current market as they struggle to access professional financial advice post RDR due to the higher entry costs of advice. New solutions that involve simplified models need to be targeted at these segments, simplified models need to be aligned to lower levels of advice risk for the supplier too ??? e.g. safe harbour type products that genuinely mitigate against speculative future redress claims whilst continuing to meet TCF principles. The wealthier segments/retired are much better served by the current market as they have more assets and are more willing and able to pay for professional advice. In addition the level of complexity of products and solutions builds the closer consumers get to retirement choices and the more wealth that consumers have given the complex tax regime. We have a separate business with around 800 advisers operating in the protection market. Their offer is very simple (life cover, critical illness, PHI and accident protection through single tie arrangements) and processed rapidly given a simple assessment of needs. They will reach nearly 90,000 customers this calendar year; an impossible reach without the simplicity of the offer and technology to ensure speedy processing. It can therefore be done in certain segments.
Park View FP Ltd	I think it can be broken down into far fewer segments...probably 3. 1. Limited - IN income and resources 2. Growing - good job good income growing in wealth and need 3. HNW and above - Wealthy lots of assets and income and many many needs
PCM Asset Management Ltd	no
Penguin	Yes, as above, we need to find a way to serve the lower segments - and robo-advice is not the solution as this is only dealing with people who have some money to invest. We need to find a way to help everyone get advice on protecting the family, their income and to start saving some money
Polygon Financial Ltd	No. Client want or do not want advice on an ongoing basis.

Respondent	Q7: Do you have any observations on the segments and whether any should be the subject of particular focus in the Review?
Profile Financial Solutions	Advice Gap probably largely relates to these groups: Living for now Hard pressed (particularly) Striving and supporting (particularly) Stretched but resourceful Retired on a budget The other groups are likely to be well serviced by traditional IFAs and/or comfortable using technology to arrange finances.
Prosperity Wealth Management Limited	We feel that it is unnecessarily wordy and potentially confusing. It is likely that consumers will not select their appropriate segment as behavioural responses are likely to lead to more aspirational selection.
Protection & Investment Ltd	The latter six categories (Stretched but Resourceful to Retired with Resources) are those who understand when they have a need and have the immediate resources and the inclination to pay for advice. It is the first four where there is a significant advice gap.
Richmond House Group	No view
Rob Coote	My biggest concern for the population is that they are in danger of outliving their money and therefore I would ask how many know how much income they are likely to get from their pensions when they retire
Rowley Goodall Ltd	AUTO-ENROLMENT The provision of life insurance especially where not provided by the employer, should be offered to auto-enrolled pension scheme members and paid for out of the employer/employee percentage. This will save the anxiety of buying family protection when premiums are very low and fees for advice are prohibitively high.
Royal Mail	Having reviewed the segmentation model, the Keep Me Posted campaign would suggest that the FCA should have a particular focus on those falling within the ???Hard pressed??? segment. This group is likely to feature a significant proportion of consumers without the ability to easily access digital platforms, consequently there is a high risk that they may find themselves left behind as a growing number of firms rely on automated, online advice services. As highlighted above, we would also recommend that this focus be accompanied by a specific assessment of those vulnerable consumers unable or unwilling to utilise digital platforms and who may benefit most from the use of traditional hard copy mail as the primary means of communication.
Simplified Money Ltd	Currently, the at-retirement segment with pension funds iro ??30-??100K seem most lost and in need of access to low cost advice. Those who are also low on other savings and have no current need to worry about issues such as IHT or capital gains tax, for example.
SK Financial	Yes. We need to start at the beginning and teach financial education properly in all education centres so that the young and vulnerable can be provided with the financial tools to help them make better financial decisions
South West Financial Planning	There is a risk that the 'retired on a budget' could be left out of accessing financial advice due to their means.
Strategic Investment Solutions Ltd (Chris Kilner)	no comment
Strategic Solutions (Michael King)	No comment
Sussex Independent Financial Advisers Ltd	No comment
Swallow Financial Management LLP	No idea!
Taurus Global Financial Advisers Ltd	No comment
The Minster Partnership llp	No
Tom Orchard (Annetts & Orchard)	Education of society should be aimed at all the younger groups in the community. Unfortunately all these groups are subject to the Darwinism of the financial services sector, which mostly does not discriminate on any other grounds other than potential short term profitability like every other business in the UK, (including those selling consumer advice). So no particular sector other than those who havent received any help before. Get professional bodies supplying advisers pro bono to teach in schools, but start rewarding those people who get involved, more carrot, less stick!
True Potential Wealth Management	Yes, get rid of segmenting

Respondent	Q7: Do you have any observations on the segments and whether any should be the subject of particular focus in the Review?
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	No
Wishart Wealth Management Ltd	I'd suggest the aforementioned groups will struggle to find high quality affordable face to face financial advice (as quality advisers don't want them and they can't afford the fees): Living for now Striving and supporting Starting out Hard pressed Stretched but resourceful Busy achievers The fact many in these groups will never make it financially is not a thing the FCA, government or advisers can 'fix'. The level of financial apathy and ignorance amongst Millennials and the X/Y generation is astonishing. Lack of any real financial education in schools and a complete mistrust in finances - aided and abetted by the failure of the banks including mis-selling scandals like PPI/pensions means they are already beyond hope.

Respondent	Q8: Do you have any comments or evidence on the impact that consumer wealth and income has on demand for advice?
2plan wealth management Ltd (Chris Smallwood)	Consumers tend to seek advice for higher value investments or when more complex decisions have to be taken. Value for money is the key motivating factor. Obviously, the higher the cost of delivery and the price of advice, the greater the challenge. There is a minimum cost threshold in delivering advice whatever the level of the sums involved, yet the value equation is different for those with higher levels of assets.
Abi Stidworthy	It is important that all levels of wealth feel they can access quality financial advice, however different products and different regulation for different situations would be great. The value of an adviser can vary depending on the situation however debt advice can be more valuable then investment advice to the right individual.
Active Wealth Ltd	It is usually only the more "well healed" clients that approach us for advice as they are aware of the cost.
Advantage IFA Ltd	It represents the degree to which advice is affordable and also can influence how much value they may receive.
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	Moderately affluent people (usually Retired) tend to seek the most advice. The bottom 6 categories in the Spotlight definitions are those least likely to seek advice
Aspire Online	No
AXA Wealth	Consumers with larger amounts of money (income and savings) are more likely to pay an explicit fee for advice. Consumers with less money are more likely to be put off because the cost has a greater material impact upon them. However, affordability and or amount of savings arent the only reasons. Consumers have to value the advice and understand the implications of not obtaining advice. The explicit nature of an advice fee combined with the challenge of seeing its value and relevance is also a potential factor. The way in which advice is currently charged has an impact on the demand. The payment alternatives for consumers are currently very limited. Payment options should be broadened to provide more choice to the consumer and stimulate demand.
Barra Gorman	Those with higher levels of wealth more likely to understand benefits of advice, seek out adviser and pay for advice
Berkeley Burke Group (Andrew Emery)	Generally, it is fair to say that those who have sufficient wealth and/or income will more actively seek financial advice than those who don't. This does not mean that those with more surplus income actually need advice and/or guidance any more than those who do not. Irrespective, it is the value attributed to advice that is the problem which also relates to the level of disposable income, trust and financial education. Remember that recent surveys indicate that, in general, people are only prepared to pay c.??200 for financial advice. It should also be noted that successive regulators and governments have created a poorly educated "monster" that believes it should be able to claim compensation from any source, even when the poor decisions that have come back to haunt them were made by the "monster" themselves! Once again, the law of "unintended consequence" has created a "monster" that believes 100% that it has no responsibility for anything, including their own decisions! It will be hard work for everyone, especially the Regulators and the Government, to convince these people of anything else now.
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	No comment
Blue Scapes	The more one has, the more one (usually) wants to see it retain it's value (or even grow) and the more one wants to use it prudently and positively. Conversely, the less one has, the more one needs assistance to increase funds in order to assist to live and, hopefully, "grow". In both cases, it seems paramount that expert, well considered advice should be available. However, this advice must be specific to the needs of the individual user, rather than in the form of generic advice provided in the hope of "something" being useful to "someone". Hopefully, we (you) are not moving towards a Q&A "tick sheet" to provide the answers for all but those who have great wealth (who would continue to be able to tap into the personalised and more appropriate and usefully detailed assistance anyway).
BPH Wealth Management LLP	Even prior to RDR, increased regulatory costs were making it increasingly expensive to provide holistic financial advice to the mass market, which is why now most IFA firms concentrate on high net worth clients, typically with at least 250,000 to invest.This has meant clients with smaller funds are either left with no advice or end up using restricted advisers often with expensive solutions.

Respondent	Q8: Do you have any comments or evidence on the impact that consumer wealth and income has on demand for advice?
Brighton Financial Ltd	We don't think wealth and income is a differentiator for advice needs. Simply that those with wealth and income are more likely to be in a position to pay for it. It certainly doesn't mean people without wealth and income would value advice in the same way.
Broad Wealth Management Ltd	higher wealth and income the higher the demand for advice. Therefore, if education/awareness was better on finances then consumers on lower earnings/wealth would then reduce the requirement for further advice However, there are consumers in all demographics that appreciate that to receive professional advice there is a cost and are happy to pay for it.
Browning Financial Planning Ltd	no comment
Caleb Roberts Financial Management Ltd	Yes, only those with reasonable assets/income can currently afford to pay for financial advice.
Caledonian Financial Management Ltd	It is my opinion that wealthy people seek financial advice more that the average man on the street. I think it is viewed as something that wealthy people do.
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	The need for, and accessibility to, generic financial guidance could be applied to all wealth segments, but the costs of paying for regulated financial advice would exclude many lower value wealth groups. The groups where the financial benefit of paying for regulated advice on complex areas would naturally be at the higher wealth value end where the impact of such advice would make a material difference to that client outcome.
Chattertons	We don't see wealth has an impact on the demand for advice, the world of money and finance is very complicated and most people need help with most areas of the financial world
Citygate Consulting Limited	It is nigh on impossible for me to deal with the same clients as I did pre RDR. Pre RDR I mostly spoke to Solicitor's 1/2 years post qualified, earning circa 70k pa. There is now no way they would consider investing via me and I still offer my initial meetings at my expense, as people will not engage with me, as a relative stranger from the outset if they have to pay to see me! Where I would previously earn a good living setting up regular pension premiums this is now totally redundant.
Close Brothers Asset Management	No comment
Combined financial Strategies ltd	Increased wealth and income gives people more choices and greater fears about losing it. So they seek help and can afford to pay for it. Moderate wealth and income want help and to know that they are not missing out on opportunities. Unfortunately, many fell prey to the banks and tied advisers on misselling products. So we need to work very hard turning them round.
Cranbourne Financial LLP	No comment
D Shearer	The more funds people have the more likely they are to look for advice
Dean Robertson	It is important that all levels of wealth are serviced by quality financial advice, just maybe different products and different regulation for different situations. The value of an adviser just explaining to a consumer with no money how bad a payday loan will be for their financial health is worth its weight in gold to that individual and ultimately to society as a whole
Douglas Baillie Ltd	Everyone needs advice. However higher net worth clients are certainly more aware of the need for advice, and are far more likely to be willingand able to afford to pay for it. Having said that, many lower income, and mid-income consumers may have accummulated four or more pension plans during their working lives that will be worth considerable amounts of money, often hundreds of thousands of ??s. but that cash is hidden away, and my experience is that most consumers (probably > 90%) have no idea of what they have.
Entrust Financial Planners Ltd	The document is largely correct that higher income/wealth consumers are more likely to seek advice. However, they are also willing to pay a premium price for it and the percentage of their income/wealth that they spend is often more than the lower income groups. This can often be associated with the generation they grew up in where financial discipline was more prevalent.

Respondent	Q8: Do you have any comments or evidence on the impact that consumer wealth and income has on demand for advice?
Essential IFA	As people become wealthier their need for financial advice increases whether that is tax planning or investment advice. It is however important that there are services in place to deal with the general consumer. I run a small IFA practice in Ipswich and we have a range of clients. Instead of concentrating on just wealthy clients, I have chosen to deal with most of the general public. Our typical client for example earns less than 50,000 per year and has 50,000 in total investments and savings. We do look after some larger pension funds for wealthier clients as well, whether that is clients in draw down or accumulation. Like many IFAs I have a mixed portfolio of clients which is not often portrayed by the regulator or other commentators on the financial services market.
Esteem Money Ltd	We have recently started working with the Citizen's Advice Bureau as part of the Moneyplan project, and have received a wide range of enquiries and introductions from them that require full advice. Many would not fall into the typical client segment that firms usually seek out, and yet these are ordinary people with needs that have to be met, and we are the best people to advise them. The take up rate has been good and the case work varied and interesting.
Financial Foresight (NI) Ltd	It is possible to profitably provide services to consumers of all wealth and incomes. The challenge is encouraging lower income groups to engage.
Forward Plan IFA Ltd	No comment
Halebarns Financial Planning Ltd	demand is strong but not at any price
Hall Financial Planning LLP	In my experience, clients who have funds in excess of every day needs demand advice.
Highclere Financial Services	Whilst the HNW consumer can afford to pay for advice it is not always valued and various surveys have indicated that the hourly rate they would expect to pay is substantially below that which advisers are compelled to charge.
Intelligent Pensions	As retirement specialists we see a broad range of clients who approach us or are referred to us for advice. For example, in the 'stretched but resourceful' segment, someone who has worked in a clerical or skilled labour position, and has a reasonable DB pension and/or a full state pension, but has also accumulated a DC pot and doesn't know how best to take their benefits. The amount involved could be large enough to be meaningful to them, without being in 6 figures, and therefore making the right choice(s) is very important. At the top end we have clients with large 7 figure retirement funds, but who rely heavily on our expert advice for LTA planning, the best use of their pension for estate and legacy planning, and the knock on effects to investment strategy.
Investec Wealth & Investment	I would agree that the matters highlighted in the review document are all potential barriers. In addition I would add a lack of trust in the industry as a whole not just in individual firms. If you also consider confusion created by the number of regulatory and legislative changes in a relatively short space of time and a consumer perception that the industry is riven with jargon and unnecessary layers of complexity, this could again put people off taking advice.
Iwan Jones	It is unfair. The wealthy get access to advice but those in real need don't . That is wrong.
James Hay Partnership (Janet Morville-Smith)	The lowest earners and those with small/no savings pots require greater help in managing money and debt than support in managing savings the exception being when it comes to retirement planning as many going into retirement are asset rich/income poor and they would certainly benefit from financial advice.
John Lord	This seems blatantly obvious in that if you have wealth you look to protect and enhance it. If you have no spare cash what is the point
Jonathan Davis Wealth Management LTD	No comment
Joslin Rhodes Lifestyle Financial Planning	I think that it is a demonstrable myth that the wealthier are more likelier to pay for advice. The desire for advice is linked to the value that someone perceives that they will get from it, not the price that they pay.
Katy Master	No comment
Lemonade LLP	To access an independent adviser for a complex area such as taking benefits from a pension fund is likely to cost in the region of 2,000. This restricts this type of the advice to the affluent and clearly there is a need for low cost advice
Lighthouse Financial Advice	Yes consumers wealth and income often mean the more affluent and engaged an individual they demand the advice as they have the ability to transact business and desire results on their finances. I am always being told that "its nice of me to consider such small investments" people always feel they don't have enough to warrant seeking advice when it is that advice that can help in either the returns or more importantly protecting their future.
Morgan Financial Ltd	As I said above. Those that have money get advice those that don't have to go to a charity like St Lukes Advice Service. Financial advisers cannot afford to give pro bono advice given the very high costs of being a financial adviser.
Morgans Ltd	Please see Q5. My data seems to suggest a relationship between income and use of advice across most areas. Although again I stress this is not a representative sample however I believe it is a reasonable assumption that this relationship exists.
Openwork Limited	See 7

Respondent	Q8: Do you have any comments or evidence on the impact that consumer wealth and income has on demand for advice?
Park View FP Ltd	Yes I believe one of the major downsides of RDR has meant that those with basic needs or on limited income can not afford to obtain proper professional advice and this has created an advice gap. This Gap clearly exists however I do not know what the solution would be to bridge this gap.
PCM Asset Management Ltd	The demand for advice is no different, to what it used to be.
Penguin	no comments to offer
Polygon Financial Ltd	See answer Q3.
Profile Financial Solutions	Those with higher wealth and income are both more likely to know they require advise and to have access to such advise. Our business largely serves those in the "Advice Gap" who will have lower income and wealth but nonetheless have advice requirements, particularly in respect of existing pension savings and at retirement.
Prosperity Wealth Management Limited	The section of society that could most benefit from sound financial planning are the ones least able to afford it.
Protection & Investment Ltd	No comment
Richmond House Group	The larger the wealth the more likely the consumer is to take advice, as they see more of a need and they can afford it. Commission may be a dirty word, but it did enable advisers to address the need of the less wealthy profitably. unless some form of long term fee financing through the product returns, or regulation at the lower end of the market is greatly simplified, this advice gap will not be filled.
Rob Coote	In my opinion the lower paid will not see the need for advice as they expect the state to provide and also are unwilling/unable to pay for advice so we are moving to an environment of those who have and those who have not advice.
Rowley Goodall Ltd	If I offer advice at a minimum fee then the client will look at the value offered. If the client has little wealth/income there will be few areas to advise on. We advise across all areas, but only the more wealthy have multiple needs and it is they who see value in our fee.
Royal Mail	The Keep Me Posted campaign has identified a strong correlation between consumers socio-economic circumstances and their ability to easily access financial advice and other, related, services. This is supported by research published by YourWealth.co.uk in July 2014 which found that vulnerable groups risk being financially disadvantaged due to the fact that they do not have internet access. Although the number of internet users in the UK has steadily risen over the last decade, there are still 7 million people who have never been online. 72% of them belong to the poorest 10% of society (with an income of 128 or less per week) and many are elderly (48% of those aged 65 and over having never used the internet). The Keep Me Posted campaigns Household Premiums Report, conducted by the Centre for Economics and Business Research (CEBR), found that households who do not use the internet pay an average of 440 more a year for their goods and services, equivalent to 4.4% of their average household income. This equates to 5.4% of the average household income for older people aged 65 plus and the most vulnerable people in society. Consequently, this could suggest that access to, and willingness to seek out, financial advice remains closely linked to socio-economic factors, with those from more deprived backgrounds least likely to benefit from access to this support.
Simplified Money Ltd	No comment
SK Financial	Yes. Consumers tend to be more keen to take advice when their income and assets increases.
South West Financial Planning	Much of the wealth is held within the older demographic. Such consumers have had many benefits during their working lives, such as lower house prices, mortgage benefitting from MIRAS, access to advice through direct sales forces through commissions helping the consumers into the saving habit. After all many of my clients have wealth accumulated through commission bearing products. Whereas younger clients, are often denied access to products and services as they have to fund a fee that they can ill afford at outset.
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	There is a need for advice from all sectors and wealth is only pertinent at the stage of advice, just because you are earning less than 30k does not man you could have built up substantial investments or pension funds in a job when you were earning more than this, therefore present wealth should not be seen as the sole driver for advice

Respondent	Q8: Do you have any comments or evidence on the impact that consumer wealth and income has on demand for advice?
Sussex Independent Financial Advisers Ltd	No comment
Swallow Financial Management LLP	No comment
Taurus Global Financial Advisers Ltd	The vast majority of clients can't afford the IFA fees, nor do they trust the banks either for good reason. I refer to clients with 10,000 to 30,000 in their pension plans built up over years. These average clients will never pay 1000 to see an IFA as it represents too much as a percentage of their wealth they own.
The Minster Partnership llp	Higher net worth clients are more likely to expect and willing to pay for advice
Tom Orchard (Annetts & Orchard)	It is important that all levels of wealth are serviced by quality financial advice, just maybe different products and different regulation for different situations. The value of an adviser just explaining to a consumer with no money how bad a payday loan will be for their financial health is worth its weight in gold to that individual and ultimately to society as a whole
True Potential Wealth Management	I feel currently that because the banks in the main pulled out of advice pre RDR (I was a adviser working for Santander and was made redundant) many people with lower sums of money just put it in a savings account and accept the poor rates of interest where has the more affluent do tend to look for advice. On a side note I feel that what Santander did to there clients i.e no one available to over a million clients to discuss there investments from 2013 to present is a disgrace, I am sure that it was the same with all the other banks that pulled out of advice with clients left high and dry unless they had over 100,000 new money to invest!!!!! and the FCA did nothing about it.....
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	Clearly those with higher incomes & overall wealth are most likely to see the value in professional financial advice & are therefore more likely to pay for it. Over the last 10 years, the cost of delivering this has increased significantly, mainly due to the cost of regulation & associated levies, to a point where only the wealthy will wish to pay the fees required
Wishart Wealth Management Ltd	Clients with resources (high income/assets) - or the capacity to achieve that status will pay good fees for high quality planning and advice. This is where the IFA sector operate. No financial or other need for IFAs to serve other sectors unless 'son of/daughter of' (inter-generational planning). For IFAs/advisers to deal in unprofitable sectors is akin to financial suicide - especially at a time when ever increasing regulatory costs are spiralling out of control.

Respondent	Q9: Do you have any comments or evidence on why consumers do not seek advice?
2plan wealth management Ltd (Chris Smallwood)	There is a significant lack of knowledge amongst consumers relating to the provision and benefits of financial advice. There also seems to be the absence of a process of referral, pointing people in the right direction to access advice. Action should therefore be taken to publicise the benefits of advice so consumers may have confidence that what they are getting is good value for money. Guidance organisations such as MAS and Pension Wise should offer better information and referral about paid-for financial advice and provide assistance in choosing appropriate advisers. High entry cost of professional advice as a result of the enormous and rising costs of regulation, compliance and supervision. The unfairness of the allocation of the FSCS levy would be a case in point and the lack of a long stop on advice would be another Lack of availability of advisers in the market as a result of the shrinking adviser base ??? now just c22,000 qualified financial advisers in the UK. Lack of trust/confidence in the industry which has been eroded by mis-selling scandals, things like endowment reviews & PPI
Abi Stidworthy	There is a lack of knowledge, people do not know what they do not know. There is also rarely any positive press from regarding the benefits of regulated financial advice. The reputation is still tarnished by the 80???s and 90???s People are also concerned about feee and are still not seeing us in the same light as solicitors and accountants who are paid for providing a service. People are also unsure where to find advisers.
Active Wealth Ltd	Percieved cost
Advantage IFA Ltd	Up front cost is a deterrent. We have to tell people how much it will cost them before we can research, formulate and then explain what value they may receive. Would you pay for something if you didn't know what you were getting in return? Plus lack of trust. People are distrustful of financial services full stop after PPI and so forth, advisers are tarred with the same brush by association. Lack of trust also comes from misconception that they are being sold too, not true now but was true certainly when banks were fully involved in providing financial advice. Finally - the internet, too many dodgy websites with unaccountable journalists to ranting bloggers who feel they know it all and need to shout it from the roof tops. Some have their own agenda, like getting subscribers, some want to sell direct services, some are criminals. But a well written article can make someone feel informed and not see the need for advice. (Even though the article may be factually wrong, not relevant to their circumstances and not include any repercussions of a course of action on other areas of their finances.)
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	many people do not know who to go to for advice
Apex CB Financial Planning Ltd	Comments: usually due to cost or lack of awareness
Aspire Online	Nicely summed up, I understand all the segments but this is the power of being referred
AXA Wealth	We believe that consumers do seek advice but not always personal recommendations as defined by the regulations. In relation to savings and investments consumers have several options to research information online, including consumer reviews on various services, and also by following leading influencers in the press. Equally, consumer research suggests that some consumers believe advice on long term investing is not for them because they are not wealthy enough. This is accentuated by advice providers setting high hurdles for providing advice either by way of minimum investible assets or income. Consumers do seek advice for complicated matters relating to estate planning, wealth protection, retirement planning and tax advice. However, these are often one time pieces of advice. Therefore, trust, knowledge improvement and engagement are key factors in generating customer action to long term saving and demand for advice. More needs to be done to promote advice and financial services in a positive light and includes the government, regulator and industry. This is fundamental because the demographics point to increasing longevity and the pensions freedoms point to increased complexity from the choices available to customers
Barra Gorman	Some people just unwilling to pay for advice as do not understand the value - only see the price and this is a barrier

Respondent	Q9: Do you have any comments or evidence on why consumers do not seek advice?
Berkeley Burke Group (Andrew Emery)	Other than the comments to Q.8, some key reasons may be: a) many lack trust in the professionalism or ability of Advisers to provide a service that can't be undertaken self-sufficiently b) many mass market clients who can afford advice but are not prepared to pay for it at the current market rate c) many lack awareness that advice exists, or is indeed important on an ongoing basis, or at key points in life, possibly because they, or the people around them, have never engaged in the advice process d) affordability, in-so-much as in the pre-RDR arena, fees were covered via commissions paid by the Provider(s) and often from the product sold. Whilst implementation of fees has helped iron out adviser commission bias, and increased fee transparency, it has deterred many from seeking advice, perhaps principally because a fee which was previously borne as a cost deducted "unseen" from a product must now be paid "upfront" and out of the clients own cash reserves. Perhaps an alternative course of action could have been to either "cap" commission, or implement a "standard" product based industry commission rate similar to the previously used "LAUTRO" rates? Such standardisation would thus be transparent and mean that Advisers would only sell products based purely on suitability which might help engage those client groups who are adverse to paying a fee "out of their own cash".
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	A number of advisers are only interested in clients with a minimum level of funds to invest, so those below that threshold will have difficulty finding an appropriate adviser.
Blue Scapes	Fear of cost. Lack of time. Frequent adverse media coverage of extreme cases. Possibly the feeling that advice is always for someone else
BPH Wealth Management LLP	The cost of advice certainly restricts those with smaller amounts to invest, due to the high costs involved in ensuring advice is compliant. With the volume of information available on the internet, they may feel they can do as good a job themselves.
Brighton Financial Ltd	In our experience, its usually because of cost but, occasionally, it is because they feel they do not need to due to their knowledge and experience. This is the view of the consumer, not us.
Broad Wealth Management Ltd	cost think they know best
Browning Financial Planning Ltd	It is too expensive, largely due to the ever increasing cost of regulation.
Caleb Roberts Financial Management Ltd	Cost.
Caledonian Financial Management Ltd	I think this is because it is perceived as something that wealthy people do and also people think that they don't have enough left over to save/invest.
Carolyn Callanan	They may not realise what advice is available or may think seeking that advice would be too expensive
Chartered Financial Management (UK) Ltd	The FAMR CfI Oct 2015 document adequately covers the various reasons, but the Lack of knowledge is fairly significant as (to paraphrase Donald Rumsfeld), it is probably what the client doesnt know they dont know that causes them not to seek advice. If consumers knew the positive impact that sound regulated financial advice could have on their future plans, then probably more consumers would see the value and be willing to pay for a recommendation as opposed to a DIY approach.
Chattertons	They don't trust it. They don't understand what independent truly means. They have never been shown the value of it. They've never met an IFA.
Citygate Consulting Limited	I have seen a vast difference in attitudes to having to pay a fee. It is now a VERY inefficient process, with negotiation about fees back and forth and clients using their employers pension, entering into poor performing default funds and not reviewing asset allocation all in the pursuit of saving a fee. Further, they continue to save insufficient amounts for the target retirement income they seek.
Close Brothers Asset Management	No comment

Respondent	Q9: Do you have any comments or evidence on why consumers do not seek advice?
Combined financial Strategies ltd	Where they do not value advice because they do not have confidence in the sector due to the various miss-selling scandals of the past 10-15yrs. Unfortunately, most of these have been caused by tied advisers predominantly from Banks. Unfortunately, it hurts the whole industry. Also, RDR should have been used by the regulator to promote the virtues of the profession. Instead it was very public in running down what was wrong with the industry. It had a massive impact on public opinion
Cranbourne Financial LLP	No experience of previous financial advice. Not understanding the complexities of the products they are dealing with e.g. pensions. Poor understanding of their longevity and hoe their needs will change over time
D Shearer	Lack of up front transparent knowledge about the cost Cost still hidden by advisers at initial contact and high when revealed. Leave it far too late because they are focused on today rather than looking ahead to retirement. Lack of clear information on the options (and not pushed enough via payslips, P60 etc.
Dean Robertson	Companies that sent out text messages, cold calls etc about ways to claim for bad advice don't help. They are mainly just sharks but they tarnish the profession. We are all tarnished with the errors of the banks.
Douglas Baillie Ltd	1. they don't know where to find it 2. they don't know what to ask the adviser 3. they are afraid of the cost of it 4. they may not trust the adviser comminity - particularly the banks.
Entrust Financial Planners Ltd	Lack of Trust is often cited and sometimes it is cost. Lack of knowledge is also definitely a factor, frequently we conduct initial meetings and show prospective clients what we do and they have a 'lightbulb moment'. Consumers have been conditioned to believe that the industry is full of commission hungry salespeople. The regulator does little to change that perception and in my opinion, probably reinforces it. Access will be an issue if more consumers want advice as adviser numbers have been decimated. Few young people are entering the profession and most owners of small practices I know want to sell and get out of the industry because of the spiralling cost of regulation and ever increasing beaurocracy.
Essential IFA	Most of the time, the reasons why people do not seek advice is because they are not willing to pay either a fee or a percentage of investment. This is often because consumers do not perceive financial advice as a service that is of value. This is particularly made worse by online providers such as Which?, Daily Mail and Money Savings Expert who constantly undermine professional financial advisers and are quick to criticise the advice industry. This in my opinion is due to vested interest of either advertising space or pay for click services. It is interesting that IFAs have to disclose all vested interests to clients but all online providers do not have to adhere to the same rules. When is online guidance not free? When the link is being paid for by an insurance company or a fund manager.
Esteem Money Ltd	DIY solutions exist for those who are happy to make their own decisions and take the risk of making a mistake. rarely will these type of consumer become a client as they do not trust others with their finances. Apathy and ignorance also come high in the rankings, so a more positive approach to supporting the industry needs to be taken.
Financial Foresight (NI) Ltd	Lack of clarity as to what service, restricted or independent, is available
Forward Plan IFA Ltd	Lack of understanding of what an adviser does, believes the cost too high, think they can do better themselves, poor experience in past.
Halebarns Financial Planning Ltd	Cost of advice is the main problem
Hall Financial Planning LLP	cost
Highclere Financial Services	The value of advice is not always visible. The historic appetite of regulators finding new 'mis-selling' fiasco's has added to the general distrust which has latterly been confirmed by PPI and banking scandals. ?? Cost is also a driver.

Respondent	Q9: Do you have any comments or evidence on why consumers do not seek advice?
Intelligent Pensions	The major factor is cost. Although the previous commission based system had many flaws, ironically it did mean that consumers were happier to take advice. The cross subsidy inherent in the commission based system actually helped in that regard. However, we think this could be alleviated in some scenarios by providing increased clarity on the option for contingent fees, as a viable alternative to fixed fees or 'time cost'. I believe many more people would seek advice if they understood that they could walk away without having to fork out hard earned cash, if they decided not to follow a recommendation. Although this sounds like commission, it is of course adviser charging, but I don't think many consumers understand that this is an option.
Investec Wealth & Investment	Added to Q8 above is the fact that access to face to face advice is seen as cumbersome and unnecessarily difficult. In this area people still rely on personal recommendations as talking about money is difficult for many people. It is therefore not surprising that many believe one can get by online or by friends advice leading to a natural over confidence as a result. As always, consumers may be in blissful ignorance believing they do not need advice when this is absolutely not the case.
Iwan Jones	Because they don't know how to go about it. Because they don't trust advisers. Because advisers are not approachable. Because people are somewhat blas or apathetic to their finances. Financial education should be on the educational curriculum
James Hay Partnership (Janet Morville-Smith)	Anecdotal evidence and FCA commissioned research highlight a lack of financial knowledge as a barrier to engagement for many consumers. Additionally, recent money.co.uk survey of 600+ over 55 year olds showed that common reasons for shunning advice included not feeling advice was needed, not being able to afford it and feeling intimidated by advisers we dont believe the advisers themselves are intimidating rather the subject matter is intimidating for the majority of people, so it comes back to education and ways of increasing financial literacy amongst all age groups.
John Lord	Ignorance of the subject, fear of mis-selling and cost
Jonathan Davis Wealth Management LTD	No comment
Joslin Rhodes Lifestyle Financial Planning	They do not understand, in advance, the value that advice can bring to them in tangible terms. They view it as a service that adds no value to them, almost like estate agents i.e. if they could sell their own house then they would and save the fees. If they can arrange a product without advice they see it as removing a cost.
Katy Master	No comment
Lemonade LLP	We would agree with all the reasons stated.
Lighthouse Financial Advice	They feel its too costly or cannot help them.
Morgan Financial Ltd	Sometimes ignorance, sometimes arrogance, some don't know how to find someone they can trust. Others think if they read an article they understand finance. Some are frightened of the cost and advisers are only looking for a client that is profitable. The FCA needs to understand financial adviser firms are very much commercial entities. This conflicts with the agenda that is being set. Cheap/free advice to the needed with all its liabilities to the adviser is not viable.
Morgans Ltd	Yes, please see earlier comments.
Openwork Limited	There are possibly a range of issues, although we have no particular statistics or work of our own to reference here: Ignorance of options available lack of consumer awareness. High entry cost of professional advice. As we detail elsewhere, we feel that the rising costs of regulation, compliance and supervision is a major cause of this. Lack of availability of advisers in the market as a result of the shrinking adviser base now just 23,000 qualified financial advisers in the UK, in recent decades that figure was 10x higher. Lack of trust/confidence in the industry which has been eroded by mis-selling scandals. Potentially, the proliferation of models across the last 30 years has bred confusion multi, single tie, independent, restricted.
Park View FP Ltd	They have a bad perception of advisers due to many scandals and also many feel advice could be too expensive especially those on limited income
PCM Asset Management Ltd	They feel they either don't require it, - ie they are not aware of what advice is, or can do it themselves.
Penguin	fear of cost not sure what they need advice on confusion over who to go to and who is independent advice is for the wealthy bad press stories ??
Polygon Financial Ltd	Don't wish to pay. Ignorance of the benefit of advice, and re product options.

Respondent	Q9: Do you have any comments or evidence on why consumers do not seek advice?
Profile Financial Solutions	For the consumers in focus of this consultation almost certainly lack of trust and knowledge rather than the other reasons identified
Prosperity Wealth Management Limited	We feel that this is a combination of cost and over confidence in their own ability. We also feel that consumers do not necessarily know when they need advice and many leave it too late. Our current education system does not adequately prepare young people to be able to understand and make informed decisions around financial management.
Protection & Investment Ltd	There has clearly been a lack of trust in the wider financial services market, predominantly due to large miss-selling scandals. However, our experience is that price is a key issue for many consumers but particularly those without significant assets or high incomes. Whilst the RDR has helped to raise professional standards and transparency, it has also clearly increased the costs of providing advice which has been exacerbated further by considerable increases in overall regulatory costs. While commission has become a dirty word, it allowed consumers to spread the cost of advice rather than paying for advice upfront.
Richmond House Group	The cost of advice is the most significant factor, and regulation is the major influencer of cost. Rather than advertise the compensation scheme, the FCA could be more positive and advertise the routes by which consumers can access advice and further enhance confidence.
Rob Coote	Firstly I think its a case of not realising the need for it. Most accountants & solicitors are approached by people when they realise that they need help with an issue whereas apart from things like mortgages people don't recognise the need for advice until sometimes its too late and also I do think that the average consumer is still not prepared to pay for advice especially as that could be to do nothing
Rowley Goodall Ltd	Education at school should give people more confidence to request advice by providing a basic understanding.
Royal Mail	This is not a topic on which the Keep Me Posted campaign is able to provide a response
Simplified Money Ltd	Some people distrust the financial industry and, sadly, this distrust seems at its highest amongst those with lower amounts of money. Price is also an issue I have heard several comments on the price advice now costs, particularly from those who have had advice before but are only now being quoted fees. Unfortunately, this is mainly because they were simply unaware of just how much commission was being paid from their product prior to RDR but explaining that fact does not make the price now any easier for them to accept.
SK Financial	Yes. Cost. Consumers are not used to paying for financial advice.
South West Financial Planning	In the main cost. They simply cannot afford the fees involved. This could be rectified with the use of commission. Commission is not taboo, just another form of funding a fee by a provider on behalf of a client. If disclosed what is the difference to an explicit fee charged to the client. Please note I am fee based, but despair at not having the option for some clients where it could be their only means to fund advice.
Strategic Investment Solutions Ltd (Chris Kilner)	There is a lot of evidence to show that clients have no appetite to pay fees. KPMG REPORT 2010 30 000 CLIENTS INTERVIEWED 45% WOULD NOT PAY A FEE True Potential Survey December 2015 2000 clients interviewed 35% would not pay a fee. Key Retirement Scraps Pension Advice December 2015 "Our Core Market £50,000 to £100,000 unwilling to pay for advice." It is my suggestion that FCA should track all of these types of surveys and you might find that there is a Consumer unwillingness to go along with a Commission ban. I would suggest you revisit the question, maybe trial a solution involving a commission payment solution and evaluate actual results against Consumer engagement and outcome. In my view, the previous detriment to consumers by allowing commission is far outweighed by the low upfront -cost option this provides to customers giving them more access to advice.
Strategic Solutions (Michael King)	Fear of the unknown
Sussex Independent Financial Advisers Ltd	No comment
Swallow Financial Management LLP	In my opinion there's a long list: its inertia, ignorance, no immediate need for them, it does not effect me attitude, I've got nothing you can do for me, I've got every thing I need, its with my employer, its with my bank, etc etc, etc In our experience people seek out financial advice when they have to and have an immediate need too, they generally go on family/friends recommendations and after the first couple of meetings are more than happy with the service provided.

Respondent	Q9: Do you have any comments or evidence on why consumers do not seek advice?
Taurus Global Financial Advisers Ltd	Read the financial press each day and evidence is pouring in.
The Minster Partnership llp	Perception of cost over benefits
Tom Orchard (Annetts & Orchard)	The main reasons I feel are firstly, a lack of knowledge, people do not know what they do not know. Secondly, there is never any positive press from anyone about the benefits of regulated financial advice. The reputation is still tarnished by the 80s and 90s (no longer warranted as no longer relevant) and also by the term financial adviser being applied to anyone who chirps up with advice. The phrase Regulated Financial Adviser should be promoted to the community and to consumers and the benefits of using, plus the dangers of not using. We need to steer people towards properly regulated advisers for help in so many different areas. Or at the very least towards regulated firms who may have a guidance service in house for some non regulated areas. Thirdly, the market has been devastated over many years and so those advisers remaining are now at capacity and many are taking the lazy option of client categorisation and chopping out large sectors of society, either directly or indirectly by pricing levels. This is basic supply and demand market forces that apply to all businesses and needs to be addresses by increasing the supply of regulated financial advisers, as legislation and product complexity is continually increasing the demand for their services, along with the demographic situation
True Potential Wealth Management	See above, I also think that sometimes clients may feel that some advisers are in it for themselves and not for the client. I have come across a number of clients who after an initial investment/pension was completed never saw the adviser again or only on maturity, one client did a pension with an adviser in the eighties and when he was at state retirement age the adviser (much older now) knocked on the door of the client and tried to sell him an annuity...the client was not best pleased.
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	Any one or combination of the following: They do not see the value in obtaining advice They cannot afford the fees They have no need for advice They mistrust the advice profession
Wishart Wealth Management Ltd	Witnessed those with smaller pension pots (typically under 50k) going direct to insurers and cashing in without advice. Also, insurers still confuse consumers when plans mature so the consumer fails to shop around - to consumer's detriment - especially on pension annuities.

Respondent	Q10: Do you have any information about the supply of financial advice that we should take into account in our review?
2plan wealth management Ltd (Chris Smallwood)	In recent years, particularly following the Retail Distribution Review (RDR), the number of financial advisers in the UK fell by almost 15%. According to the FCA, in 2009 there were 27,000 financial advisers, but this fell to 23,500 by 2014. The costs of running an advice firm have risen since the RDR was implemented. A significant percentage of firms costs arise directly from regulation, particularly for smaller firms and is one of their greatest challenges. This is not just about the fees and levies firms have to pay but also the indirect costs such as regulatory reporting and ensuring compliance with the rules.
Abi Stidworthy	no
Active Wealth Ltd	There needs to be a training academy or funds provided to IFA practices to help train new recruits in to the industry. All fines need to go into the financial services industry (not the chancellor) If no support is provided there will be no advisers in 10 years
Advantage IFA Ltd	People trust face to face advice as it allows them to see the whites of your eyes and get the measure of an adviser and whether they feel they can work together. But is time intensive and costly. For advice to be reliable it needs to involve a conversation and not just a form for a client to complete. People are notoriously bad at completing forms with detail and will omit items they don't consider relevant or not read questions correctly, possibly altering the resulting advice dramatically. This is the main concern I have over robo advice.
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	Yes: qualified financial advisers are difficult to find and recruit. We have been trying for nearly 12 months to find an adviser and have decided to bring one up through training a paraplanner. There is an industry-wide problem of recruitment of new advisers into the profession from school and university exacerbated by product providers and banks withdrawing from delivering financial advice.
Aspire Online	Financial advice is supplied in a number of ways, the old fashioned face to face which is the most comfortable but the most expensive, skype type communication and robo type advisers, its just too expensive to supply advice at the bottom end. I'm not convinced consumers in enough numbers what robo advice
AXA Wealth	No
Barra Gorman	No comment
Berkeley Burke Group (Andrew Emery)	Concentrate on perfecting "robo advice" as it is the long term future for the mass market in financial services. Bespoke advice will eventually become the domain of the wealthy and the advisory marketplace will contract at its own pace to accommodate. Additionally, financial education introduced at schools as a mandatory curriculum subject might promote the value of advice and raise awareness for future generations. I would also suggest that the minimum qualification level for Financial Advisers be raised to Chartered standard (Level 6) by 2020.
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	No comment
Blue Scapes	No, save that I have a particularly good IFA who has provided exemplary service for myself and my late wife, and I /we have been fortunate as he follows on from an equally fine IFA who advised her family and then us for many years prior to his retirement. Men of experience, knowledge, excellent communication skills, and integrity.
BPH Wealth Management LLP	No comment
Brighton Financial Ltd	No
Broad Wealth Management Ltd	No comment
Browning Financial Planning Ltd	no comment
Caleb Roberts Financial Management Ltd	It is very costly to run a financial advice business between FCSC and PI fees. Therefore our charges to clients need to be sufficiently high to cover this and make a profit.
Caledonian Financial Management Ltd	No comment
Carolyn Callanan	No comment

Respondent	Q10: Do you have any information about the supply of financial advice that we should take into account in our review?
Chartered Financial Management (UK) Ltd	There needs to be a clear distinction between providing generic guidance (no recommendation) and regulated advice (personalised recommendations). Regulatory requirements, operational costs and the risks of litigation mean that providing regulated advice can be a costly exercise, thereby excluding lower wealth groups. The supply and accessibility of generic guidance has most likely increased and this should be of benefit to all groups, but of most value to lower wealth groups where paying fees would be disproportionate to the potential gain in future outcome
Chattertons	At the moment it is run too much by compliance services who, in trying to ensure compliance with all the rules, make advice too difficult. There are three things that need to go into a suitability report - demands and needs, product recommended to fit those demands and needs and suitable risk warnings. The reliance on compliance has moved advice further away from this and the RDR independence standards have further muddied the waters. This is the reason for my suggestion of a brokerage service which goes back to those three fundamentals - but it cannot be called advice as this would cheapen the work that RDR has done. Brokerage should ensure that the product is suitable and that's it - if the product isn't suitable then it shouldn't be arranged.
Citygate Consulting Limited	I don't have access to this information. I cannot understand why the FCA doesn't know this from all of the annual returns they receive.
Close Brothers Asset Management	No comment
Combined financial Strategies ltd	No comment
Cranbourne Financial LLP	No comment
D Shearer	Despite my rather negative comments, I can honestly say that our Financial Adviser has been of outstanding benefit both to us a couple and our family. He has assisted us in planning for our own retirement and also helped source financial products for family in the matters of care costs and use of pension funds to get enhanced annuities. Whilst we know he is being paid well, we do believe the cost is worth it and that more people should benefit.
Dean Robertson	Allowing a lower level of regulation for a suite of regulated products, (provided supplied by quality regulated firms) should be encouraged. . The regulator needs to make it harder to borrow money than to save money
Douglas Baillie Ltd	With regrd to pensions advice: I think that only a very few advisers and firms have the necessary FCA permissions and PI insurance needed. It would be interesting if the FCA wetre to research and publish how many active advisers are 'pension transfer specialists' and what % of the adviser population they represent.
Entrust Financial Planners Ltd	On-line tools and calculators may help the masses, but not if they look like the poor attempts at help offered by MAS. Get the industry to take on this role as they understand what consumers want and need, but with lighter regulation to make it feasible and profitable.
Essential IFA	IFAs have to complete a sales process when giving a recommendation e.g. fact find, research, suitability letter, presentation, application process and review. This process is often complicated and long winded but provides hopefully great customer protection. If online advice is to become a reality, there needs to be a development of the same type of system that provides consumers with the same level of protection and most importantly, these services need to pay the appropriate FSCS fees to cover potential claims in the future. I do believe that there needs to be a greater emphasis on the consumer taking responsibility of their actions as too often, consumers say that they have been misadvised even after receiving full IFA sales procedure. How can you say that you have not been told about risk for example when you have completed a questionnaire and received a written explanation
Esteem Money Ltd	The best clients are those referred by other satisfied clients as this is a people business first and foremost. Relationships are key to good advice and will help prevent scams. Consumers without advisers should be encouraged to "Phone a friend", and ask them if they can recommend an adviser to help them. They will point them towards their trusted adviser if they have one
Financial Foresight (NI) Ltd	No

Respondent	Q10: Do you have any information about the supply of financial advice that we should take into account in our review?
Forward Plan IFA Ltd	The categories needs to be clearer - as above - and some recognition of restricted who use the whole of market for the products they offer to differentiate from providers who only offer their own contracts
Halebarns Financial Planning Ltd	Plenty of advisers available, but I believe consumers are frightened of being ripped off.
Hall Financial Planning LLP	the cost on advice firms is prohibitive. with no long stop, there is little incentive for new blood coming into the industry.
Highclere Financial Services	Twenty five years ago there were 8 advisers for every one available today. The trend toward ridding the market of undesirables has a baby and bathtub hue to it. Advisers suffer the costs of regulation, the twice yearly top up required by the FSCS to lavish 'compensation' payments, the intrusive remit which enables the Ombudsman service latitude to ignore the precepts of law and devise its own version of fairness. Is it any surprise that so many have left the industry? Given the average age of advisers as being mid fifties there is certainty that adviser numbers will continue to drop which will further exacerbate the advice gap.
Intelligent Pensions	No.
Investec Wealth & Investment	Wealth management businesses have traditionally tended to offer advice on a face to face professional level which would be tailored and focussed by its very definition. There is the case for lower down the market being able to offer decision trees/flow charts and tools to facilitate decision making especially where the options are more binary. Of course, there is already a plethora of factual information available free of charge for those who wish to look. Those who need professional advice, however, are mainly time poor and therefore rely on professional face to face advice.??
Iwan Jones	It should be free for all
James Hay Partnership (Janet Morville-Smith)	Providing advice to all is not just about access or the cost of providing it, but ensuring there is a proper understanding of the value of advice. This means ensuring the reputation of the industry is improved and better outcomes can be demonstrated to customers. Clamping down on unregulated advice and companies offering ???free??? pension reviews is essential.
John Lord	No comment
Jonathan Davis Wealth Management LTD	No comment
Joslin Rhodes Lifestyle Financial Planning	Proper financial planning is the solution. Looking at a clients holistic human needs and helping them to arrange their lifestyle and money to support that. Often without the needs of a product. Everything from the regulator to the ombudsman is product based and the word advice is inherently linked to product provision.
Katy Master	No comment
Lemonade LLP	No comments
Lighthouse Financial Advice	Actual advice should be available to all in some form and not wrapped up in spin and labelled as advice when its not, its guidance the government after spending years cleaning up the industry put it back by its use of words.
Morgan Financial Ltd	There is one issue that has always existed in larger firms. The fee/commission has to go too far. Let me explain in an example. If a fee of ??100.00 is paid to an adviser in an firm. c. 10% goes on regulation, c. 25% to an introducer, c. 50% to the firm. The adviser has earned ??15.00 or so. There are too many slices being taken out of the pie. As risks and costs increase costs to the public are going up not down.
Morgans Ltd	No comment

Respondent	Q10: Do you have any information about the supply of financial advice that we should take into account in our review?
Openwork Limited	In terms of the supply of new advisers - RDR has undoubtedly helped to professionalise the industry and as a result we are seeing young people choosing the sector as a professional choice but at sub optimal rates. It is clear from the regulator???s own statistics that the number of advisers is falling overall, not rising. It now takes many years of training and qualifying before an adviser can be effective in either the Mortgage or the Wealth market. This is both costly and risky for employers and we see it acting as a brake on recruitment of inexperienced staff into the sector. There has been a real lack of innovation in the market, with a number of notable false starts around safe harbour products, simplified advice etc. The utilisation of new technology has been slow to impact in this space. Although the regulator has repeatedly indicated that it is for the industry to innovate in this area, the lack of willingness to modify or remove regulatory barriers has remained a hindrance. For example, the attitude of the FOS around the presumption of advice being given even where it can be demonstrated that client was dealt with execution only or non-advised has proved to be a barrier to new thinking. Similarly the insistence that all possible alternative solutions are provably discounted within advice based sales. We are similarly seeing the emergence of a view that advisers handing off to another adviser with a particular specialism can still leave the ceding adviser with issues if the receiving adviser gives poor advice. This cannot be desirable and can lead either to advisers wishing to remain generalists or simply not referring at all.
Park View FP Ltd	As above I feel HNW consumers and those with good incomes are better served than ever due to much more professionalism within our industry. but those on limited income and resources are very poorly served. Many years ago I worked for a traditional life company collecting savings premiums on council estates and low income areas. Whilst these old policies were expensive they did encourage a savings culture and since the removal of the man fro the pru type distribution many poorer families don't save at all.
PCM Asset Management Ltd	No
Penguin	Yes - you need to find a way to introduce a long stop to cap business owner/adviser liability - no other profession carries their advice liability around for a lifetime and no other profession judges its advice with the benefit of hindsight! Also need to find a way to encourage new blood in to the industry Drive levy down - costs are too high - our levy was up over 100% this year. define what a financial planner is so that those that arent planners and dont look at holisitic positions of clients cant call themselves planners
Polygon Financial Ltd	Impact of fees we face impacting upon range of clinents due to their affordablity re us.

Respondent	Q10: Do you have any information about the supply of financial advice that we should take into account in our review?
Profile Financial Solutions	We are surprised that this consultation paper makes no reference to the emerging and fast growing trend towards "Telephone Advice" (i.e. Face to Face advice - but over the telephone). For those in the Advice Gap professional financial advice delivered over the telephone is probably the largest single solution as it can be scalable, low costs and highly compliant. Our business alone has delivered independent advice to over 5000 people so far during 2015 using ONLY the telephone. This consultation has made wide spread mention of web and on-line developments, the reality is those in the Advice Gap are unlikely to use such developments due to lack of trust and knowledge. Telephone based advice is particularly suited to harnessing technology (including web based tools) to drive increased efficiency and thereby deliver low cost, scalable and compliant mass market advice. Therefore we believe a key focus of your review should be recognising and facilitating telephone based advice combined with technology to bridge the Advice Gap.
Prosperity Wealth Management Limited	We agree with the comments made in the review regarding the supply of financial advice.
Protection & Investment Ltd	Reduced supply from banks and large institutions as the economics of supplying advice simply did not work for them. Reduction in the number of independent financial advisers due to RDR and a lack of trainee advisers joining the industry. Escalating costs of regulation provision of advice is simply not profitable for some. Lifetime potential liability/lack of a long-stop significant barrier to entry to the industry.
Richmond House Group	None
Rob Coote	Yes, the numbers of advisers in the UK now which is at a time when the emphasis on financial planning for things like retirement has switched from Government and employers (with the removal of final salary pensions) to the individuals who are unable/unwilling to look at hat is required. Financial advisers help their clients make the right decisions by educating them.
Rowley Goodall Ltd	Ideally through the workplace
Royal Mail	This is not a topic on which the Keep Me Posted campaign is able to provide a response.
Simplified Money Ltd	No comment
SK Financial	Yes. Begin with the end in mind. What are you trying to achieve? Who do you want to benefit? What are the challenges? What is the feedback from consumers? What is the feedback from intermediaries?
South West Financial Planning	I would like to see the return of direct sales from providers to motivate consumers to action on their financial planning.
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	Investigate CMCs who purport and give the impression that they are regulated
Sussex Independent Financial Advisers Ltd	No comment
Swallow Financial Management LLP	REDUCE THE LEVEL OF DOCUMENTATION NEED TO PROVIDE ADVICE! this is the single biggest factor for any adviser. It influences who we talk to, what we want to talk about, it immediately enables us to decide whether or not we want a business relationship with any client. Since 1980 we were happy to talk to any client about any issue to help them with their immediate need or future need either on a pro bono basis or commission basis if there was any sale. Unfortunately, due to the regulatory burden over the past few years we will not offer this service to anyone due to the accountability and documentary levels required. Additionally, we have stopped transacting certain types of mainstream business and in over 25 years have never turned people away, unfortunately, however this is now a regular occurrence and does not sit comfortably with me still!
Taurus Global Financial Advisers Ltd	None to hand.
The Minster Partnership llp	No

Respondent	Q10: Do you have any information about the supply of financial advice that we should take into account in our review?
Tom Orchard (Annetts & Orchard)	Proper regulated quality firms should be rewarded by way of a regulatory dividend of sorts (mentioned before by the regulator) for increasing their numbers in a quality and sustainable way. It is a big risk for any business to take on new staff, and one which is so expensive to enter and so hard to get in to / be allowed to trade should be encouraged. The best model is medium sized regional IFA offices, where they have resources to recruit but have controls in place and a suitable firm culture to ensure all new advisers are brought in to respect their position as trusted advisers, not abuse it (as we have seen in larger organisations such as banks, direct sales etc). Allowing a lower level of regulation for a suite of regulated products, (provided supplied by quality regulated firms) should be encouraged. Also bringing in a regulatory sand-box for certain lower levels or a de-minimis amount e.g. regulation-lite and liability-lite for new pensions clients or new regular contribution ISA clients. The regulator needs to make it harder to borrow money than to save money. We have a system (and even worse now a culture) in the UK where someone can gamble or borrow money in minutes (or both!) from a smart phone from anywhere (bar, casino..) but if they wanted to commence a regular savings plan / pension, they are forced into a massively regulated and costly space. That should be turned on its head. Consumers will not look this space out and seek calculators and online tools, they need proper encouragement to spend their money on their future, rather than the current generations of have it all now. The culture has been ingrained by many years of mistakes from the government, the regulators and the sector.
True Potential Wealth Management	Advice should be available to all, sometimes it could be done in a streamlined manner ISA only for example to save time and money for both client and adviser, with the option for a fuller review at a later date
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	Fewer individuals / channels delivering advice has led to greater costs of regulation for those remaining which in turn has increased the cost of delivering advice beyond the reach of many
Wishart Wealth Management Ltd	Supply of the best quality advice is limited. Take any adviser/advice firm at the top of their profession and highly qualified (to Level 6). These firms now typically service a profitable niche and decline new client (consumer) enquiries that don't fit the bill - and where the firm/adviser cannot operate at a decent profit. This means many (the majority) of consumers will fall through the 'advice gap'. Direct sales and banks used to fill that gap but abolition of commission and ever increasing costs means it is no longer profitable for these companies to deal in this area.RDR has closed decent financial advice (that was admittedly heavily subsidised by insurers) off to the majority.

Respondent	Q11: Do you have any comments or evidence about the recent shift away from sales based on professional advice, and the reasons for this shift?
2plan wealth management Ltd (Chris Smallwood)	Since RDR there has been a significant increase in non-advised product sales. This trend is likely to have a variety of causes, though the increase in regulatory and other costs in the provision of advice coupled with the costs of compensating consumers (through FOS or FSCS levies) is a major factor. In addition, the transparency of the costs of advice, following RDR, where fees are more visible than commission, has added to this trend. The problem may be addressed by requiring disclosure of commission for non-advised sales. This may encourage consumers to opt for advised products once they are aware that there is also a price attached to non-advised options.
Abi Stidworthy	No comment
Active Wealth Ltd	Financial services was originallly based upon sales. People do not buy life insurance, they need to be sold it. People do not buy incoem protection they need to be sold it. People do not buy pensions, they buy which a pension will give them. If we only consulted we would only be recommending single premium investments and pensions. This is professional financial advice. Whilst I appreciate the banks were not the best or insurance compaanies were not the best they were the training ground for this industry. They are no longer there
Advantage IFA Ltd	I have not detected any change. I left a bancassurance to work for myself because the sales pressure was too much. When the ability for the bank to apply sales pressure was removed they applied it in different ways and reduced adviser numbers as an overhead. IFAs out there are mixed, some are very sales driven and it is fine to have a competitive edge but you need to act in the best interests of the client. I have not seen any change in the underlying behaviour of banks or these IFAs since RDR, they just now call it something else. That said the firms with the best sales cultures are the most profitable. You have a few of them on your panel.
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	No comment
Aspire Online	Financial advice is supplied in a number of ways, the old fashioned face to face which is the most comfortable but the most expensive, skype type communication and robo type advisers, its just too expensive to supply advice at the bottom end. I'm not convinced consumers in enough numbers what robo advice
AXA Wealth	Its unclear as to whether this shift is from consumers who have previously received a personal recommendation and now feel more confident in making their own decisions (for some needs) as a result, or they are truly consumers who have taken this route without ever having received advice previously on the products they are purchasing. This is an important point as if it is mostly the former then the driver for the self-direction is still the original recommendation.
Barra Gorman	Growing popularity of DIY online investments & press direct offers. I feel some press direct offers should be regulated when linked to /placed beside articles promoting a specific company.
Berkeley Burke Group (Andrew Emery)	More affordable advice = "robo advice"; "robo advice" = simplified products with fewer options; simplified products = consumer assumes responsibility for the 'advice' that it receives from the "robot"; consumer chooses = expensive "Professional" advisers no longer part of the 'advice' process; no "Professional" adviser costs = more affordable advice
Berkeley Burke Group (Tony Durant)	Regulatory restrictions on advisers (in the form of excessive due diligence), disabling them from giving advice in certain markets leads to a lack of choice on the part of the consumer who is then forced by his own desire to take direction from an unregulated source. Often this business is then placed through a regulated wrapper where historically administration and not advice has been the service offered. Wrappers carry PI insurance with the result that when a claim arises from a poor choice, the consumer, with the backing of compensation-chasing lawyers, comes against the provider of the wrapper. FCA, and increasingly FOS, are going for the soft target with their subjective calls for due diligence on the part of the providers, which fuels the eagerness of those seeking compensation for the failure of their own choices and will escalate the demise of the bespoke wrapper supplier and reduce the choices available to the consumer. The consumer has to be allowed to make, and be responsible for, his own mistakes if we are to live in a world of free choice for individuals.
Blevins Franks Financial Management	No comment
Blue Scapes	No comment

Respondent	Q11: Do you have any comments or evidence about the recent shift away from sales based on professional advice, and the reasons for this shift?
BPH Wealth Management LLP	The need to now declare costs up front due to RDR may have been part of the reason for a reduction in advised sales. However, it's likely that a large proportion is simply due to more information being available to consumers to enable them to do things themselves.
Brighton Financial Ltd	Every consumer is unique. A new product is not always the solution to a client's situation. They may just need help with their existing circumstances. Moving away from a sales based on advice is, in our view, extremely healthy and something many of our clients have found refreshing and helpful.
Broad Wealth Management Ltd	our firm has always orientated the advice around clients objectives and therefore not sales based. still feel that there needs to be education for advisers in firms the requirements to move away from a sales based model. It appears the problem with sales based is the larger advisory firms
Browning Financial Planning Ltd	Banning of commission on regular premiums savings plans eg ISAs. other than this, i don't believe there has been a shift. The vast majority of clients were happy i was remunerated from the product and they frankly don't care whether it is called commission or advice. Strangely since the banning of 0.5% trail commission, most advice firms charge from 0.5-1% per annum.
Caleb Roberts Financial Management Ltd	On the whole it works but as mentioned previously those who can only afford a smaller level of monthly savings will not be provided by financial advice as they can't afford the fees. Commission based would serve them much better.
Caledonian Financial Management Ltd	I think this is a good thing. I think that implementation of the RDR was necessary and mainly the reason for the shift.
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	No further comment
Chattertons	I have seen no evidence of this. I have seen evidence that more people are going D2C, however more people are also using advisers. I think that with the economy nearing a recovered state to pre-crisis (08) levels people simply have more money and more of a desire to save.
Citygate Consulting Limited	I prefer the basis of an on-going professional service, but I cannot see why this couldn't have been part of a hybrid service between fees and commissions. For example, 3% initial and 0.5% IF there were an on-going service to be given AND the ability to turn the on-going off.
Close Brothers Asset Management	No comment
Combined financial Strategies ltd	The move to fees has been good for the industry. I firmly see myself on my client's side picking the right financial options for them with no financial gain difference between products or providers. However, this question also sums up what's wrong with regulation at the moment. It still see's us as salespeople of financial products. What we are now is the salespeople of a professional service. It is the advice process that is the product and the Funds/pensions/ isas are just tools. However, regulation still seems to focus on what tools we use rather than "advice" as the product. This is also what is wrong with the FSCS levy issue and the reason that all FSCS Levies should come through Product Charges.
Cranbourne Financial LLP	The FCA must be aware that thousands of financial advisers left the industry around the time the RDR was put into force in Jan. 2013. Hundreds of tied/multi tied advisers were laid off by banks and insurance companies. There are now thousands of consumers with no contact with an adviser. There are many more who have never met an adviser and do not appreciate the value of face-to-face advice. Inevitably other sources of distribution through the internet and other channels will be providing non-advised sales to parts of the population.
D Shearer	I didn't know this, it's a bad idea if sales are being made without advice unless consumers have adequate knowledge to make their own decisions.
Dean Robertson	Supply and demand is the biggest factor, if we had twice as many regulated financial advisers, and they were allowed to transact certain elements in a fairer, cleaner way, we would have twice as many people getting quality regulated advice instead of a life of crippling debt repayments and eventually being supported by the state with the whole of society ultimately paying.

Respondent	Q11: Do you have any comments or evidence about the recent shift away from sales based on professional advice, and the reasons for this shift?
Douglas Baillie Ltd	This is a direct consequence of the RDR and the ban on commission payments to advisers. It should be noted that in my experience, customers do not actually have a problem with commission, per say, as long as it is disclosed. The concept of fee charging is defineitely a 'turn off' for most consumers and results in them not taking any form of advice at all.
Entrust Financial Planners Ltd	Increased costs after RDR. Cost was never cited as a barrier by my prospective clients pre- RDR and consequently we were able to deal with a broader section of the public (including lower income consumers). This is no longer the case, we cannot deal profitably with low income/wealth consumers due to spiralling levies and continuing business risk due to having no longstop in place. I believe that most advisers have decided not to deal with the lowest earning 80% of consumers because the time spent on regulation per client is much larger, the business risk hasn't reduced and the regulatory fees have gone through the roof. I believe that the main contributor to cost is the regulator. My business expenditure on direct and indirect regulation cost is now beyond 35% of expenditure (over 20% of income). Also a continued lack of trust in the advice industry as mentioned above. Why can't the regulator champion the people that it regulates?
Essential IFA	I believe that there has been a market shift in the regulatory attitude towards unauthorised financial advice as it obvious to me and many other financial advisers that the FCA is not clamping down on unauthorised sources of advice. In 2013 I did do a freedom of information request to see how many unauthorised financial advisers the unauthorised business team of the FCA. The Unauthorised Business Department had received 6,000 reports of alleged unauthorised activities or financial promotions during the period of January to December 2012 but only 750 were taken forward as new cases. The UBD was unable to give me figures on how many of these resulted in convictions. Is it no wonder why websites like MoneySavingsExpert.com and others feel that they can operate on journalistic principle when the regulator is doing almost nothing to enforce its own statutory objective of protecting the consumer? I would???ve thought that a way of adhering to its statutory objective of protecting the consumer is to enforce authorisation rules and more importantly marketing rules. How can somebody be a money expert with no qualifications? Surely that is a breach of even the most basic marketing rule?
Esteem Money Ltd	RDR has helped us focus on our service proposition, helped us provide something more tangible and substantial and of greater value to clients. Having a clear understanding of what we do professionally allows us to formulate solutions that are not sales based, and that can be charged for as a fee for advice.
Financial Foresight (NI) Ltd	No
Forward Plan IFA Ltd	No comment
Halebarns Financial Planning Ltd	No comment
Hall Financial Planning LLP	No comment
Highclere Financial Services	no
Intelligent Pensions	I believe this has been as a result of the growth of investment web sites that make online buying easier, coupled with a perception that professional advice is expensive.
Investec Wealth & Investment	As the financial services industry moves away from product to service, the concept of a sale necessary to generate revenue is becoming less common in the post RDR world, with fixed fees for initial and ongoing advice. The concept of paying a fee for advice, similar to paying for accountancy or legal services, is embraced more at the higher end of the wealth market but for those who occupy the savings gap there is still a reluctance, as there is in other professions.
Iwan Jones	This is a step forward. However costs are still too high.
James Hay Partnership (Janet Morville-Smith)	No comment
John Lord	No comment
Jonathan Davis Wealth Management LTD	there is insufficnent shift. if there were there would be a smaller Buy To Let industry still too much contingency selling
Joslin Rhodes Lifestyle Financial Planning	It is a very good thing however the role of multi ties and St James Place type sales organisations erode the foundations of this.
Katy Master	No comment
Lemonade LLP	We have found the transparency of fees (i.e the unbundling of products) has reduced the demand for advice. People were happy to transfer their pension to a 1% annual charge when our costs were covered by commission. However many are reluctant to pay a fee to transfer despite the lower annual charge meaning they will be better off in the long run.
Lighthouse Financial Advice	I have been in the industry for 20 years and started at 23 years old and the advisers today are just that the training and CPD is not structured towards "sales techniques" but tailored to identifying needs

Respondent	Q11: Do you have any comments or evidence about the recent shift away from sales based on professional advice, and the reasons for this shift?
Morgan Financial Ltd	For me it works well with those clients with money. We are turning potential clients away. Clients know that there is no product bias. Sadly those without money have to go to our charity.
Morgans Ltd	Since the 1990s we have seen the demise of the door step services and subsequently the direct sales forces. Although these were sales orientated and the products were not always the most suitable with high charges and mediocre performance, the existence of these sales channels meant that people saved (often small amounts) on a regular basis. This is something that has been lost and we need to find another model that will replace it. Whether it is possible replicate services of this type on-line is questionable. Regarding the changes since RDR, advisers seem to have adapted to the new environment and much less cross subsidy exists than in the past. Although this is good for advisers and consumers that are able to afford to engage it does mean that more lower income individuals are being excluded.
Openwork Limited	Compulsion through Auto Enrolment has clearly improved personal savings without necessarily involving personal financial advice and we have also seen a gradual rise in execution only sales too as a result of increased access to technology. We dont view this as a shift away from advice; it is just an understandable reaction to the market flexing to satisfy un-met demand and the introduction of compulsion in workplace pensions.
Park View FP Ltd	Yes because clearly with the advent of RDR more firms understand the need for proper professional advice and the much better outcome it delivers for their clients. Giving professional advice is so much more than just 'selling' a product. Good advice will encompass cashflow modelling, meetings with other professional for clients, generic tax planning, keeping clients up to date with legislation, wealth management,.........the list is endless. And this type of advice and relationship is valued so much by clients.
PCM Asset Management Ltd	Not aware of any shift.
Penguin	No comment
Polygon Financial Ltd	Ther has been no shift. IFA have always proffered professional advice. I cannot speak for the banks!
Profile Financial Solutions	We suspect it is a statistical variation caused by the huge increase in execution only type services in the Annuity area. Plus the impact of more sophisticated investors using Platforms (like HL) directly for SIPPs and ISAs rather than via an IFA.
Prosperity Wealth Management Limited	In our view those consumers who we have met and who have adopted a non advised approach come to realise the benefits of professional financial advice at different stages of their lives.
Protection & Investment Ltd	No comment
Richmond House Group	Statistics show an increase in non advised product sales. This is not good for consumer outcomes. Also, there appears to be increasing sales of unregulated products. Unless the regulatory burden is significantly reduced, and investment in unregulated products is excluded from the FSCS, I fear we will see this trend increase.
Rob Coote	I believe that the need for exams have helped to create a more professional environment for the clients by removing some advisors from the industry however I do also feel that it hastened the retirement of some good advisers whose clients may have been left without an adviser at the time when they possibly needed an adviser they trusted i.e. when they approached their own retirement.
Rowley Goodall Ltd	The cost of advice has probably reduced since it changed from commission to fee. If explained with patience many clients will be perfectly happy to pay the charges.
Royal Mail	This is not a topic on which the Keep Me Posted campaign is able to provide a response.
Simplified Money Ltd	No comment
SK Financial	Yes. Cost is a key factor. Another key factor is the internet. Information is more readily available. The emergence of the direct to consumer platforms is another key factor too
South West Financial Planning	Yes the loss of the direct sales forces would be welcome to ensure access to advice from all quarters. Those consumers with the means will seek professional advice. Those without the means now will, with the help of the direct sales forces will eventually have the means to then take professional financial planning advice.
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	No comment
Sussex Independent Financial Advisers Ltd	na

Respondent	Q11: Do you have any comments or evidence about the recent shift away from sales based on professional advice, and the reasons for this shift?
Swallow Financial Management LLP	The level 4 diploma requirement was the best thing for the industry as it increased the knowledge across the industry and closed a lot of direct sales forces down due to their calibre of staff, their clients are gradually migrating to advice firms and should be getting a better holistic approach.
Taurus Global Financial Advisers Ltd	RDR has helped in this matter. Sales based consultants still hang on and are too prevalent though. St Jame's Place is a great example.
The Minster Partnership llp	Good move - message to the public that we are advisers not sales people and that advice is impartial
Tom Orchard (Annetts & Orchard)	Supply and demand is the biggest factor, if we had twice as many regulated financial advisers, and they were allowed to transact certain elements in a fairer, cleaner way, we would have twice as many people getting quality regulated advice instead of a life of crippling debt repayments and eventually being supported by the state with the whole of society ultimately paying.
True Potential Wealth Management	Thankfully I have never sold anything to a client I am a professional financial adviser and as such I advise clients not sell to them. I feel that RDR was a very good thing and generally most advisers are fit and proper with a small amount that still just sell to clients for the sake of a sale and commission/fees
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	Not all sales-based advice was bad though much of it was. It points to a failure to properly regulate sales-based channels which caused so much of the mis-selling & has led to the over-regulation which is now so prevalent & the associated cost
Wishart Wealth Management Ltd	We find consumers with assets / income seek the real truth about money. The real truth about money is not whether "this Provider is better than that Provider" or this fund is better than that fund or this pension is better than that pension. For most clients they see that as dull and extremely boring. However, thats exactly where most Financial Advisers traditionally focus their service - and waste their time. But what clients really want, more than anything, is a truthful answer to the big questions. Proper financial planners provide answers to the BIG questions. Questions like: - What do I have to do to ensure that I NEVER run out of money "How much do I need to earn, save or sell my business for to give me what I want out of life When, precisely, can I afford to stop doing the things that have become a dragand start doing the things I really enjoy Exactly what level of investment return do I need to achieve my objectives? And, possibly the biggest question of allHow much is enough?" Traditionally, most financial advisers - being too focused on products - have failed to consider, never mind answer, these questions. Its not surprising then, that the majority of people have no idea where they are heading. They may have assets, investments, and/or high levels of income, but most people have no idea what it all means. We pick up quality clients from advisers and banks where these 'bigger picture' genuine questions are simply not being addressed.

Respondent	Q12: Do you have any comments or evidence about the role of new and emerging technology in delivering advice?
2plan wealth management Ltd (Chris Smallwood)	Most advice firms value the personalised face-to-face advice that only a human can provide, especially for financial planning where more complex analysis and human engagement and empathy are required. However, automated solutions are emerging and may help advisers be more productive. Robo-advice can be seen as a complementary tool to proper full face-to-face advice. It could be a way to bridge the affordability and accessibility gap.
Abi Stidworthy	I don't feel that a computer system can replace a highly qualified, skilled, regulated, competent and caring adviser.
Active Wealth Ltd	Yes, technology will never replace a professional financial adviser. Technology will not take account of the soft facts.
Advantage IFA Ltd	Technology should be a way to engage consumers in the value of advice however it is about 20% as effective as it should be because of regulatory constraints and compliance. You can't be instantaneous on twitter and everything needs a caveat or to be described as an #ad which is an immediate turn off. IT is a lost opportunity at the moment.
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	No comment
Aspire Online	Financial advice is supplied in a number of ways, the old fashioned face to face which is the most comfortable but the most expensive, skype type communication and robo type advisers, its just too expensive to supply advice at the bottom end. I'm not convinced consumers in enough numbers what robo advice
AXA Wealth	AXA Wealth believes that emerging technology will provide an important alternative to the traditional methods of providing information and advice, from generic through to a personal recommendation.
Barra Gorman	No comment
Berkeley Burke Group (Andrew Emery)	Under the current regulatory landscape - increased FSCS levies, increased Professional Indemnity premiums, increased complexity in almost all areas' of financial planning, etc. - how can it be possible for advisory firms to offer a low cost, mass market, full bespoke advice proposition of sufficient quality? Quite simply, it isn't. However, if the "robo advice" and/or automation concept is made available, some of the perceived benefits may be: a) "robo advice" addresses the advice gap for the time constrained and cost constrained, as it can be used for simplified, restricted or self-sufficing advice b) it may help those people who are technologically savvy and are less convinced by the benefits of face-to-face adviser advice, but still require a form of financial advice c) it can help foster greater engagement by non-participants at a more affordable cost in certain advice areas d) it could provide an adviser with the means to segment their client base, thus driving increased efficiency's in advice provision and providing for greater participation amongst clients who cannot afford face-to-face advice e) technology can be effectively used in areas such as model portfolio implementation and online factfinding, which could help harness better efficiency, productivity and servicing f) technology could be used to provide tools and guidance to help savers get "up the learning curve" and prepare them for an encounter with a Financial Adviser g) Auto-Enrolment has already been pioneered
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	The technology used should not have effect on the regulatory position, and the output of the advice should be more important. The potential damage to consumers does not depend on the technology that presents the advice.
Blue Scapes	Good for getting current information (valuations, opportunities etc) Speed of access to information
BPH Wealth Management LLP	Limited scope or targeted advice could play a part in reducing the advice gap, along with the use of technology, for example so called "robo-advice" where a consumer is led through a programmed sequence of events to arrive at a solution.
Brighton Financial Ltd	No.
Broad Wealth Management Ltd	take advantage of new technology where it can reduce time. Technology is not the be all or end all as long as the end result is beneficial for end consumer.
Browning Financial Planning Ltd	no comment
Caleb Roberts Financial Management Ltd	It's good for cost comparison but dangerous for more complicated areas.

Respondent	Q12: Do you have any comments or evidence about the role of new and emerging technology in delivering advice?
Caledonian Financial Management Ltd	I think this area is fraught with danger. The reason for seeking advice is to get the help of an expert. If you are then left "doing it yourself" you miss speaking with the expert, which the part that clients draw the benefit from. We could all log in and do an ISA but withouth the benefit of speak to an adviser how do we know that's what is in our best interest?
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	Technology can help to improve access to sources of guidance and advice, and may help with operational efficiencies in firms delivering regulated advice. It is unable to fully understand a complex client scenario with multiple emotional factors at play and so would be unable to provide a comparable regulated advice service to a competent adviser or planner. It could help narrow down options for a client wishing to seek guidance in specific areas, but these are likely to be pre-scripted outcomes determined by the various inputs to any system. Technology may be able to help the mass market who are seeking a DIY approach, but it is unable to ask open ended questions to the users and be able to fully understand the responses ??? in this regard, we need to be sure that the clients are fully aware of the difference in this type of guidance (maybe a pre-determined solution based on inputs) versus regulated advice (with a personal recommendation).
Chattertons	Robo advice is what I would call brokerage - it is a simple assessment of demands and needs and an appropriate product arranged to meet those needs. It does not cover off what advice means in the post-RDR world.
Citygate Consulting Limited	I think it is all very positive, however, I have seen many clients keen to invest into the latest fad fund they have seen, some of which are carbon credits, student property etc; where they would have lost a lot of money to a scammer. I think there is still enough of a resistance to using technology based on the security of everything!
Close Brothers Asset Management	No comment
Combined financial Strategies ltd	I am concerned that robo-advice will lead to another misselling scandal as the main enthusiasts are product providers who will benefit from directing customers down funnels to specific products.
Cranbourne Financial LLP	No comment
D Shearer	Why can't FCA develop and publish software that can be used by financial planners or individuals to provide a far cheaper solution for consumers that would be trusted? (similar to Citizens Advice QBC software which calculates all benefit options)
Dean Robertson	No computer system can replace a highly qualified, skilled, regulated, competent and caring adviser.
Douglas Baillie Ltd	Yes, I have plenty of evidence and practice experience gained over the last eitht years, and before that: Based on the regulatory regimes that came in via FIMBRA, the PIA, the FSA and now the FCA, I have for some time now been developing an electronic service that helps me and my firm to use technology, combined with advice, to deliver FCA rules compliant suitability outcomes. the technology also creates and delivers an 'audit trail' that retains files and notes permanently to assist with training and the defence of malitious claims management.
Entrust Financial Planners Ltd	No
Essential IFA	Although like many advisers we are attracted by new technology and the potential of giving repeatable good quality financial advice, I am also acutely aware of the potential dangers and liabilities that this also represents. I do believe that if so-called robotic advice becomes the norm within financial services, this should be placed into a different category for calculation of FSCS fees as a failure of a robotic advice process could represent a very large cost to the advice category. I also believe that any new technology advice process should adhere to the same principles as face to face advice.
Esteem Money Ltd	Technology should be there to support the process, not replace it. This is a people business and will always be reliant on face to face interaction to ensure clients receive the best advice and service.
Financial Foresight (NI) Ltd	For more complicated advice and/or for less sophisticated client "robot" advice will have difficulty being succinct.
Forward Plan IFA Ltd	the terminology needs to be changed. it is not advice. it is facilitation of what a client thinks they want in response to set questions
Halebarns Financial Planning Ltd	OK for advisers as it produces beautifully presented 20 plus page reports, but consumers don't read beyond page 2, Why waste money unless image is important
Hall Financial Planning LLP	No comment
Highclere Financial Services	Technology can assist advisers and consumers and may reduce time spent on certain activities. What it cannot yet do, and may never do, is galvanise consumers into taking steps to protect themselves, arrange pensions and the like.

Respondent	Q12: Do you have any comments or evidence about the role of new and emerging technology in delivering advice?
Intelligent Pensions	We think that online tools can be very helpful, but think that this would be more safely delivered as a precursor to real advice. The completion of a preliminary automated process is in our experience educational and informative, and prepares the customer far better for the follow up professional advice. By automating much of the preparatory work, the cost of delivering the advice can be greatly reduced, provided this is delivered incrementally to the online automated general advice. Relaying solely on automated advice, with no human involvement at all, is potentially dangerous in certain situations. We therefore believe that while automated advice processes should be encouraged this should be heavily caveated and emphasis given to the value of professional advice.
Investec Wealth & Investment	Artificial intelligence and robo advice would seem to have a place at the lower levels.
Iwan Jones	It is frightening to the mass public
James Hay Partnership (Janet Morville-Smith)	Finding ways to strip out cost and complexity from the operating model is a big hurdle when it comes to being able to offer full advice to more than just High Net Worth clients. Platforms can play a role here. There is a case to be made for how existing platform technology is evolving and being deployed to meet mix and match advice needs where the same platform enables DIY investing for straight forward transactions and advice to be switched on when required for more complex areas of financial planning. Advisers benefit as it helps to drive down costs and drive up efficiencies. Investors benefit as their adviser can manage the various savings pots, whether pensions, ISAs, general investment accounts, in one place. Care needs to be taken on how technology is offered to market and ensure people understand whether theyre receiving advice or information
John Lord	No comment
Jonathan Davis Wealth Management LTD	most normal people will do well from robo advice those with more complex needs will need wealth managers
Joslin Rhodes Lifestyle Financial Planning	It works at a very low and simple level. Ultimately people want to look into your eyes before they believe you.
Katy Master	No comment
Lemonade LLP	We believe technology is the key to delivering lower cost advice
Lighthouse Financial Advice	Computers have been a great tool to make life efficient and speed up processes with investment into back office systems. Although the front end is a people based system and needs to be and thatis where the time is taken.
Morgan Financial Ltd	Technology is great and it is now available to small and large firms on the same basis. Costs of analysis tools have really come down. This can only benefit consumers
Morgans Ltd	No
Openwork Limited	Mass consumer adoption of mobile and tablet technologies has resulted in the utilisation of web based and comparison aggregator sites becoming the norm in respect of consumer buying behaviours for non-advised general insurance purchases. Recent innovations in Roboadvice in the US and Australia seem to suggest consumers have a similar propensity to purchase where advice on financial planning decisions is required. This is an area of significant interest to us as a method of serving different customer segments as we adapt our model over the medium term in recognition of current adviser demographics.
Park View FP Ltd	I feel that a simplified advice structure for lower earners could work if they have basic needs. But I am worried that certain types of business my exploit this area to flog products again!!!
PCM Asset Management Ltd	I don't mind technology being used,- so long as the liability for wrong choices made by people acting on a Non-advised basis can be contained, and not passed onto firms like us, who are not involved in those decisions being made.
Penguin	Technology can help the advice process but it can never, in my opinion, replace what people need - which is to talk through their position and have questions asked that will help someone make an appropriate decision about what they need. The phone and email can work - but not decision trees and certainly not decision trees on robo websites that are only talking about risk and investment not life shortfalls, tax and needs.
Polygon Financial Ltd	Robo Advice .....A replacement for decison trees which we feel will often disadantage the client.
Profile Financial Solutions	New and emerging technology will undoubtedly have a huge impact on the delivery of advice - but probably not in isolation. We anticipate that few consumers and particularly few in the current Advice Gap will use web and on-line tools alone to replace advice. However new and emerging technologies are likely to enable the more efficient processing of financial advice. It should be recognised that the traditional face to face delivery of advice is only one part of a process of creating and processing such advice. Technology has a great role to play in enabling this whole process at lower cost and with greater efficiency - particularly when combined with telephone delivery for even greater efficiency and consumer acceptability.

Respondent	Q12: Do you have any comments or evidence about the role of new and emerging technology in delivering advice?
Prosperity Wealth Management Limited	It should open up guidance to those consumers who would not ordinarily access this kind of information.
Protection & Investment Ltd	No comment
Richmond House Group	No view
Rob Coote	I do see a place for it especially for the younger generations as that is the way they communicate. However, I would be concerned if it was being used by a firm to market all its clients
Rowley Goodall Ltd	No comment
Royal Mail	While the Keep Me Posted campaign welcomes the use of new and emerging technologies in delivering financial advice, we would stress that the platforms provided through these technologies are not easily accessible by all consumers. Indeed, 7 million people in the UK have never used the internet, with the vast majority (72%) being the poorest 10 per cent in society. Furthermore, almost half (48%) of those 65 years of age and over have never used the internet. Consequently, despite the potential for new technologies to provide new avenues through which consumers can access financial advice, it is important to note that these are not appropriate for all consumers and risk marginalising some of the most vulnerable.
Simplified Money Ltd	I think it is perfectly possible to introduce technology into the advice process to streamline the straightforward situations and reduce the overall cost of recommendations considerably. There may be a need to retain human interaction somehow for reassurance at times of big decisions, as there is with doctors but if doctors in the US are being outdone in their ability to makes accurate diagnoses by algorithms on computers, then it is perfectly possible for computers to be used to support financial advice.
SK Financial	Yes. This will play an increasing part in the advice space. I wonder if it will aim to fill the void left by the advice that the bank assurance provided. I think the younger generation will be more adept to using this and will feel this is a more convenient way to operate.
South West Financial Planning	Such technology should be welcome and reduce the cost and time in delivery advice and should be welcomed.
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	No comment
Sussex Independent Financial Advisers Ltd	No comment
Swallow Financial Management LLP	No, basic service yes or no outcomes
Taurus Global Financial Advisers Ltd	The large old platforms in the UK such as Cofounds, Axa Elevate, Old Mutual etc can't develop this form of technology easily or at a cost effective price point. True Potential has innovated in this area and is forging a great path on low cost advice, from Newcastle upon Tyne.
The Minster Partnership llp	More efficient and comprehensive reporting and fact gathering
Tom Orchard (Annetts & Orchard)	Any system which has no regulated financial advice firm controlling it and interjecting throughout the process is doomed to complete failure and this will lead to even more mistrust in the sector. No computer system can replace a highly qualified, skilled, regulated, competent and caring adviser. Ever.
True Potential Wealth Management	I think that it is a dangerous precedent to offer technology based robo advice, technology definitely has its place within financial advice, working through true potential the tech that we use and the client has access to is very good and Impulsesave is an excellent addition to the service that I offer clients enabling them to top up there isa/gia/pension with anything from ??1 to ??99,999 via an app on their phone/tablet or laptop with in their own client website. However full advice from a series of questions without any real explanation of risk reward capacity for loss etc is very dangerous and open to complaints in years to come.
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	No
Wishart Wealth Management Ltd	There must be a way to enable D2C advice that is affordable and understandable to the mass market. I think Apple Inc. would make a better job of this than the current industry, government or regulators. Needs redesigned from ground up. Apple can build it - but will the consumer use it? Comes down to consumer ignorance (lack financial education) and apathy.

Respondent	Q13:Do you have any comments on how we look at the economics of supplying advice?
2plan wealth management Ltd (Chris Smallwood)	Advice costs are high and getting ever increasingly so. The current burden of the FSCS levy is being unfairly spread across the whole industry even where the particular area of review/redress is only participated in by a smaller sub set of the industry ending up with the good paying for the bad. We need to ensure the unscrupulous advisers pay and not permitted to remain in the industry providing advice or selling dodgy products. Furthermore, these advisers must not be permitted to just phoenix their firms and continue with their poor practices.
Abi Stidworthy	No comment
Active Wealth Ltd	Put the fines back in to the industry! Many advisers I know are closing down as they can no longer afford to trade. The RDR has destroyed many adviser practices, even mine.
Advantage IFA Ltd	You are looking too short term. If I want to take on a new adviser, open a new office or take on additional staff I will need a 5 year business plan to back up that decision. However, just over 50% of my costs are to my network and regulatory fees. I don't know what these will be from one month to the next. The recent FSCS levy is a good case in point, it prevented me taking on an apprentice and increasing the long term supply of financial advice. The levy came out of the blue and all I see in the news is FSCS payments going out left right and centre to cover schemes I have never heard of in many cases and I am wondering when is the bill for these going to come in, how much will it be this time, I had better not spend that extra money to build the business I was planning is the consequence.
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	I don't think you look at the economics at all, if the outcome is a reflection on the process. The ideals and principles that have led to ultra low cost pension and investment products have increased the cost of delivering the advice (due to higher professionalism, more documentation and more record-keeping) and alienated those with limited affordability.
Aspire Online	Unless you are willing to cross subsidise bottom end clients (which I believe is not allowed) how can you squeeze blood out of a stone
AXA Wealth	The current regulatory costs for providing face to face personal recommendations are a barrier to new firms entering the market, particularly large scale advisory firms. The result being that small to medium size firms base target markets and in some cases fee structures around a typical consumer with a minimum amount of wealth. Consumers that dont meet the minimum wealth threshold are often deemed uneconomical. To compound the issue, those firms that have previously served consumers with simpler solutions and lower investment levels have also left the industry (Bancassurance models). Contributory cost factors include: Qualification requirements. Back office support e.g. T&C arrangements, advice file checking. RDR adviser charging rules banning the cross subsidization of adviser charges within vertically integrated firms. These economic pressures, created by the RDR, led to AXA Wealth withdrawing from the personal recommendation market. AXA Wealth understands the rationale for much of the RDR. For example, to improve professionalism of advisers and the desire for a level playing field (with respect to charges) across the advisory community. AXA Wealth also agrees that for the more complex personal recommendations the current requirements are justified. However, the requirement for all personal recommendations, irrespective of complexity to be treated equally should be reviewed. For example, the simpler, less complex products e.g. Stocks & Shares ISA and retirement accumulation through standard products like personal pensions, the regulatory requirements could be clearly split into two separate tiers. The more complex personal recommendations remaining as is today with a lighter touch for the simpler category.
Barra Gorman	No comment

Respondent	Q13:Do you have any comments on how we look at the economics of supplying advice?
Berkeley Burke Group (Andrew Emery)	This is simple; the cost off providing "traditional" face-to-face holistic financial advice has been forced beyond the reach of the general public by the costs associated with regulation, compliance, corporate risk and a culture of "no responsibility" by consumers, Regulators, and Government alike. You may wish to consider using Social Media to help deliver affordable advice although the policing of such a proposition might prove somewhat challenging.
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	No comment
Blue Scapes	No comment
BPH Wealth Management LLP	No comment
Brighton Financial Ltd	This is a big one. How the FCA delivers advice to those who are not in a position to pay for it in the conventional way is a real challenge. It needs to be delivered economically but it must also be sufficiently robust so as not to lead to outcomes that are detrimental to consumers. Computer based advice trees, Q&A processes could be a possible solution.
Broad Wealth Management Ltd	My view is there is always likely to be cross subsidy for clients of a firm. If you take the view every client has to provide a certain level of profit then this will push advice to the more wealthy.
Browning Financial Planning Ltd	no comment
Caleb Roberts Financial Management Ltd	No
Caledonian Financial Management Ltd	No
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	From an operational, risk management point of view in running a regulated financial advice business, the costs to the firm are a direct result of providing a high quality service to a client that meets regulatory requirements whilst also protecting the firm from future liability against claims (from Claims Management Firms or clients). In order to significantly reduce costs per ???unit??? of advice, it would appear that firms either need to deal with larger cases of advice (higher wealth value groups) or upscale existing operations to cover a larger number of clients to spread the cost base more thinly. This would naturally lead to a smaller market of available regulated financial firms, possibly reducing supply to consumers even further.
Chattertons	The advice profession will always struggle to recruit due to the idiosyncratic manner in which we have to train and get signed off. It is almost as hard to become an IFA as it is to become a solicitor - so growth will always be restricted and this is a good thing. Brokerage is an area that can expand rapidly. Being an investment broker and completing risk profiles before arranging a multi-manager with fidelity is not a hard job and would aid the employment situation in this country.
Citygate Consulting Limited	I think the cost of regulation is too high and I personally feel like I am paying the price for poor advice given years before I even started working. In order to pay the costs of regulation, tech to run the business and having an office it is circa 25k per annum. I live a fairly modest existence as I try and get traction. There is limited scope for a new advisor to enter the industry without being charged large "over rides" from whichever company they work for.
Close Brothers Asset Management	No comment
Combined financial Strategies ltd	Consumer risk needs to be explained and encouraged again. it seems that everything has been done to ensure the public get all the upside return when things go well but none of the loss when they go badly by levying the advice industry. An understanding of the realities of risk and reward needs to be encouraged so everyone understands the ups and downs, and needs to take more responsibility for their actions.

Respondent	Q13:Do you have any comments on how we look at the economics of supplying advice?
Cranbourne Financial LLP	Advice has been made costly by the layer upon layer of regulation that now covers all aspects of delivering financial advice. My experience in just 8 years as an adviser is that this has grown enormously in that short time. People can get information from internet and other media, and there are 'decision tree' models available??that cover some simple advice needs. They do not replace face-to-face advice that is dynamic, takes account of changes in circumstances and market conditions and has the resource to deal with complex products and situations.
D Shearer	It would be useful to survey and publish indications of costs that can be expected by consumers. I suspect there is little gradation of costs i.e. it's all expensive and at the top end
Dean Robertson	Many quality firms like ours will take no risks, and therefore treats all consumers with the same regulatory and compliance overlay. This means many potentially simpler areas of advice still are expensive and onerous to the firm. This is down to a lack of trust from firms in the regulator and the ombudsman, and the ludicrous gap in between those two bodies. Until they both join together and made unequivocal statements that cannot be reversed allowing advice-lite products and services, this will always be the case. Also, items such as FCA - FSCS levies and PII are all percentage based fees, so those elements cost the same to the adviser, irrelevant of the risk. The structure of the FSCS and its inherent unfairness will destroy the advice sector (in its current format).
Douglas Baillie Ltd	Unfortunately the economics appear to be not well understood. The greatest cost by far (apert from the obvious costs of running an advice firm) relate to fact-finding and know-your-client (KYC), where the process of 'discovery' is immensely time consuming, but nonetheless paramount in forming the future base for suitable advice. Very few cistomers know 'what they already have- particularly pension plans' and are usually unwilling to fill in fact-finds, and not willing or able to pay for that to be done by me or my firm. Professional advice cannot begin until the KYC is firmly established and leads to suitability (COBS 9)
Entrust Financial Planners Ltd	The cost of regulation is far too high. It continues to increase and what has it achieved? Consumer confidence at an all time low, advice gap at its largest ever and financial institutions and schemes failing on a regular basis causing consumer detriment. The only real success has been the long needed raising of qualification standards. Costs could be reduced for firms by the Treasury no longer stealing the fines from the industry (the government always saya that the FCA is not a government body, if so why is it helping itself to the fine proceeds?). If these fines were left 'in the pot' effectively the firms causing the bad consumer outcomes would be helping to pay compensation for consumer detriment (the polluter pays). Instead the Treasury takes this money and leaves me and the other firms to foot the bill for failed schemes that we have never recommended. Consequently I pass some of that to my clients and hence the decline in demand. The input document mentions cross subsidy, this surprises me as the FCA sought to outlaw that in the spirit of treating customers fairly. Cross subsidy was exactly the model the advice industry use pre-RDR, which the FCA sought to abolish. Another way to decrease firms costs is for the Regulator to take some responsibility and look at authorising products with some form of risk rating, to end the never ending UCIS schemes. Buyers of high risk high reward schemes have to take some responssibility for their own decision making, almost a 'Buyer beware' label. All of the unregulated scheme compensation payments seem to have a knack of making their way back to the regulated advisers which doesn't seem right. You could make product providers pay an authorisation fee based upon the potential risk to consumers of the product that helps to pay for any future claims when firms become insolvent. If the regulator claims that they do not have the resource to do the due diligence, how can it reasonably expect firms with 0.0001% of the FCA budget to be able to carry this out.
Essential IFA	I think the FCA and government need to encourage advice firms to invest in training and development of new advisers. This can only be done by supporting IFA practices and larger companies by protecting authorisation regulations rather than undermining. It has been calculated that on average it costs 85,000 to train a fully qualified financial adviser to competent status when you take into account sales training and file reviews. This is a considerable investment for practices and only viable if we have certainty of market conditions.
Esteem Money Ltd	A supermarkets doors are wide open, and do not check ??the personal worth and income level of those who walk through them. The products are on sale, with prices marked and the consumer makes their choice. Why should we be different? There are many retail outlets in most towns, where consumers can get their products; some will choose on cost, others on value; or the whole experience. Our delivery must be consumer driven, not through prescriptive rules.

Respondent	Q13:Do you have any comments on how we look at the economics of supplying advice?
Financial Foresight (NI) Ltd	No
Forward Plan IFA Ltd	There has to be a way of looking at how the less affluent can pay for advice via the contract when this is a regular savings plan or regular contributions to a pension. it is wrong to discriminate against those who cannot afford an upfront fee which prevents them from getting the best financial advice
Halebarns Financial Planning Ltd	Cap charges of providers and IFA's, and more people wwill seek advice. ban percentage charges
Hall Financial Planning LLP	The cost to professional businesses must be addressed. Billing adviser firms for the mistakes of others cannot be right. I have no control over the advice given by others.
Highclere Financial Services	No
Intelligent Pensions	There is no doubt that as a result of increased regulation the amount of work involved in a full advice process has made this very expensive to deliver. We also believe that there is high demand for less expensive options, and that by giving better definition around what is needed for 'specific professional advice' (currently focused or simplified advice) advisers would be more amenable to developing lower cost options.
Investec Wealth & Investment	Here is the answer for Q13 and Q14: Firms traditionally used to and there was inevitably a subsidy between those who received advice via the sale of the product and paid a commission and those who did not take up the advice/product recommendation. The change in legislation and consolidation of advice providers has meant that there has been a paradigm shift towards fees, both initial and ongoing for advice whether a product sale is involved or not. This in turn has led to client segmentation and true analysis of revenue per client. For some firms the starting point of analysing the cost of giving advice to a client is in the physical cost of actual client take on, e.g. files, time spent, and admin. support, etc. with a premium for the take on of risk and some margin. There is some evidence that some advisers are also looking to provide additional services for existing clients to add value and strengthen relationships
Iwan Jones	It appears the FCA just want to get rid of IFAs .
James Hay Partnership (Janet Morville-Smith)	No comment
John Lord	no comment
Jonathan Davis Wealth Management LTD	i seee little analysis of how much debt there is and how it comes about - debt backed on to property is till debt and negative equity in a zero interest rate world will be devastating no analysis at all apparently of banks who lend recklessly
Joslin Rhodes Lifestyle Financial Planning	496 cost per session of Pension Wise delivered. Really? Empower the consumers by giving them 300 of IFA vouchers
Katy Master	No comment
Lemonade LLP	PI Insurance is a significant cost that needs to be contained. Ambiguity over regulation obviously affects the ability to obtain and the cost of PI insurance
Lighthouse Financial Advice	Take away the FCA costs to the industry would reduce the burden on advice firms and enable them to lower earnings. You need to look at some slim approach of advice tied into apprenticeship
Morgan Financial Ltd	As far as I can tell without wishing to seem sarcastic, (the economics of advice must be looked at) the FCA does not consider the net cost of advice to the client and the service provider. Adviser firms operate economically now just like an accountant or solicitor firm.
Morgans Ltd	There has been much debate at about the cost and effectiveness of services such as MAS and Pensionwise. It has been suggested that a voucher system allowing consumers a set amount of time with a regulated adviser may be more cost effective and result in higher levels of engagement. Although I can see the rationale behind this argument I am concerned that not all parts of the financial services industry would enter in to this type of arrangement in the spirit that it would be intended. Evidence suggests (Nottingham Trust index) that consumers have high levels of trust in individual advisers but not in the industry more generally. Furthermore, the industry has a history of adapting what appear to be ideas with the consumers interests at heart into what have become yet another mis-selling scandal. Perhaps there is some space to look at social enterprise models where concepts such as the voucher system could be tested.

Respondent	Q13:Do you have any comments on how we look at the economics of supplying advice?
Openwork Limited	Advice costs are high, particularly in the Wealth/COB arena and we feel there is still room for different regimes but they cannot all share the same burden around FSCS & FOS, if safe harbouring is to be successful (regulating the product rather than the advice) then significant reconsideration of FOS criteria needs to happen in parallel. We also feel very strongly that the current burden of the FSCS levy is being unfairly spread across the whole industry even where the particular area of review/redress is only participated in by a smaller sub set of the industry. We would like to see the current FSCS levy calculation being based on the premise that the polluter pays otherwise there is no economic advantage for us to keep our proposition narrow (restricted in our case) and safe (no high risk/unregulated products) if we simply get presented with a bill based on the whole industry cross subsidising those guilty of mis-selling. Exploring ways of making the levy more risk based, centred on the nature of the firms proposition, would be a significant step in the right direction.
Park View FP Ltd	Clearly the current regulatory and Levy funding is falling on too few good firms. I think I pay 4 or 5 times more into levys than I pay to the regulator. Surely this should be the other way around. I would rather pay more to the FCA to STOP poor advice rather than to the levy to pay for poor advice.
PCM Asset Management Ltd	Not aware of how the FCA calculates the economics of 'supplying advice'
Penguin	Yes - drive down levy costs, provide a transparent trustworthy, qualified ombudsman service, bring in a long stop and stop ambulance chasing PPI type companies feeding the blame culture frenzy where noone takes responsibility and thinks they can blame anything that goes wrong on anyone else but themselves
Polygon Financial Ltd	Far from the IFAs/real world position taken into account.
Profile Financial Solutions	It is more economical to deliver advice to more homogeneous groups in volume using technology combined with the telephone, compared to delivering bespoke advice face to face. Perhaps the comparison would be between an M&S suit and a Saville Row suit - both do the same job and most people would struggle to distinguish between them, but there is a substantial difference to the way they are made and the associated costs. For those with less complex situations (vast majority of those in the Advice Gap) an "M&S" approach to advice should be more than adequate - and deliverable!
Prosperity Wealth Management Limited	As a small firm our approach to supplying advice is to ensure that our own financial position is directly aligned to that of our clients and our fee structure reflects this. The increasing and unpredictable nature of regulatory fees is beginning to impact on this approach. The FCA should ensure that all regulated firms have the clients best interests at the centre of their propositions and the regulator should ensure that they are acting in a manner that supports the advice sector. In order to achieve this the regulator should provide clear guidance on what fees consumers might be expected to pay and ensure that regulated firms operate within this guidance.
Protection & Investment Ltd	There is a basic economic cost with providing advice to any client, regardless of assets/income. The additional requirement post RDR, along with higher and rising regulatory costs means the cost of advice has had to rise and will continue to do so unless regulation changes.
Richmond House Group	You must understand that regulation has got out of control, that caveat emptor does not apply, that the whole process is geared to defending potential claims rather than enhancing client understanding.
Rob Coote	I understand that the costs of regulation keep going up whilst consumers are being told via the media that cost for advice should be falling. If that continues then something has to give which may mean that those who give quality advice only doing so to the richer element of the population who can afford to pay the fees.

Respondent	Q13:Do you have any comments on how we look at the economics of supplying advice?
Rowley Goodall Ltd	No comment
Royal Mail	This is not a topic on which the Keep Me Posted campaign is able to provide a response.
SK Financial	Yes. Financial education in schools, colleges and universities. Encourage intermediary firms to provide local clinics that offer tips to consumers.
South West Financial Planning	Regulatory costs are too big a burden and continues to rise. Regulatory process are inhibiting advice and innovation. The lack of clarity and long stop continues to increase the cost of Professional Indemnity insurance.
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	No comment
Sussex Independent Financial Advisers Ltd	na
Swallow Financial Management LLP	Reduce firms regulatory and associated regulatory costs, apportion the FSCS levy to the relevant practitioner/ industry elements. Use industry fines to reward good practice or to fund the FSCS levy which is a complete embarrassment in an alleged free and democratic society!
Taurus Global Financial Advisers Ltd	The biggest factor and importance has to be on the ever rising financial burden on those IFAs standing in the market place. Were these costs reduced basic advice could be very easily instigated.
The Minster Partnership llp	no
Tom Orchard (Annetts & Orchard)	Many quality firms like ours will take no risks, and therefore treats all consumers with the same regulatory and compliance overlay. This means many potentially simpler areas of advice still are expensive and onerous to the firm. This is down to a lack of trust from firms in the regulator and the ombudsman, and the ludicrous gap in between those two bodies. Until they both join together and made unequivocal statements that cannot be reversed allowing advice-lite products and services, this will always be the case. Also, items such as FCA - FSCS levies and PII are all percentage based fees, so those elements cost the same to the adviser, irrelevant of the risk. The structure of the FSCS and its inherent unfairness will destroy the advice sector (in its current format).
True Potential Wealth Management	In an ideal world advice should be open to everyone, however in reality someone looking to open a regular isa for example with 25 per month is very difficult to give advice on and be cost effective for both adviser and client, not really sure what the answer is to this
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	Do you look at the economics of supplying advice? If so, how can you fail to spot that the ever increasing burden of regulation has pushed the cost of advice way beyond the reach of many people

Respondent	Q13:Do you have any comments on how we look at the economics of supplying advice?
Wishart Wealth Management Ltd	Shut down all the expensive QUANGOS (MAS and Pension Guidance) and with the ?? millions of money saved give consumers cash vouchers to seek authorised and regulated financial advice instead. Forget 'guidance' masquerading as 'advice'. Advice means someone somewhere can be held liable for the information given and the actions arising from hat information.

Respondent	Q14: Do you have any comments on the different ways that firms do or could cover the cost of giving advice (through revenue generation or other means)? Do you have any evidence on the nature and levels of costs and revenues associated with different advice models?
2plan wealth management Ltd (Chris Smallwood)	No comment
Abi Stidworthy	No comment
Active Wealth Ltd	Firms are financially stretched. FSCS fees have gone up by over 75% how is this sustainable
Advantage IFA Ltd	I think the client and adviser should be allowed to determine how they want to pay for their services. In a modern capitalist society it seems incredible that you would even contemplate telling a firm how they have to calculate their fees for what they do or tell a client they have no choice in how they pay for what they want. Also, setting a fixed review fee will likely increase the advice gap and will exclude more clients from advice. Percentage ongoing fees are preferred by me as they also reflect the potential risk that a client exposes the business too. If I make a mistake on 50k portfolio it will be 10 times cheaper to rectify than the same mistake on a ??500k portfolio, hence why I use ongoing percentages.
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	No comment
Aspire Online	I have no evidence on the different models
AXA Wealth	For firms offering advice through personal recommendations the RDR has limited revenue streams to initial adviser charges, and ongoing service. Many advisers have a fee structure linked to a % of funds under management, particularly the on-going service charge. This has led advisory firms to focus on wealthier consumers as they are commercially the most viable.
Barra Gorman	Vertically integrated SJP include cost of advice within a discontinuance charge on bond products - this hides the true cost from client and not in line with RDR
Berkeley Burke Group (Andrew Emery)	An acknowledgement that the concept of RDR was flawed might be a good place to start. It was always going to be a challenge to ask consumers to pay for something that they had perceived to be free for countless generations. As a result of RDR everyone is now acutely aware of how much "Professional" financial advice really costs and quite simply, without the benefit of Provider product subsidies, very few individuals can affords to buy the service that is needed. Ask yourself how, historically, most people meet their legal fees - the answer is "Legal Aid". That process is not dissimilar to financial services in-so-much as it is a very professional and costly service that is not a direct cost to the individual.Whilst innovation remains suppressed due to fear of the Regulator and/or Professional Indemnity premiums and/or Ambulance Chasing lawyers, the opportunities to improve the situation are likely to remain stagnant.
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	No comment
Blue Scapes	No comment
BPH Wealth Management LLP	No comment
Brighton Financial Ltd	We only offer face-to-face advice. We are aware of simplified advice models but we do not know if they deliver this commercially.
Broad Wealth Management Ltd	No comment
Browning Financial Planning Ltd	yes, go back to commission on regular premium products. If you want to save face call it something different - but everyone will know it is commission so just call it "commission".
Caleb Roberts Financial Management Ltd	Only that costs are very high
Caledonian Financial Management Ltd	No
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	Some firms may choose to deal with lower wealth value clients that may have a potential to inherit or become higher value in time. Lower wealth value clients may tend to have less complex financial needs and so would require less initial work to advise and recommend solutions, but then the costs of providing an ongoing service would be broadly similar in the different wealth groups. Therefore, if an ongoing fee is based on the value of a portfolio under advice, the size of the portfolio would need to be large enough to be able to accommodate an appropriate fee (this would unfortunately exclude lower value clients).

Respondent	Q14: Do you have any comments on the different ways that firms do or could cover the cost of giving advice (through revenue generation or other means)? Do you have any evidence on the nature and levels of costs and revenues associated with different advice models?
Chattertons	Advisers generally charge 3% initial fee and 0.5% to 1% on-going, the AdviserAsset reports tell you this. Advisers will not take on smaller clients due to minimum fees. Ours is 500, but we really don't like taking on clients with less than 60,000 to invest unless there is a reason for that (their family may be more affluent clients of ours for instance). What you tend to find is that the bigger deregulated firms charge more and provide less - we find this with will-writing firms and probate firms. They don't have professional private client lawyers and actually charge more for an inferior service
Citygate Consulting Limited	There is insufficient referrals from other professionals and insufficient value placed on advice altogether. Seldom are the stories of how good advice saved someone money
Close Brothers Asset Management	No comment
Combined financial Strategies ltd	Not sure what the question is asking. Surely we cover the cost by clients paying their fees.
Cranbourne Financial LLP	No comment
D Shearer	Rather than taking ongoing percentages (which seem unfair if regular management is not needed, possibly allow some payment method that can be taken off from premiums or income for the first part of the term then stop
Dean Robertson	no comment
Douglas Baillie Ltd	In my experience, the successful recovery of the costs of advice from the consumer are mostly retreivable from a product deduction or 'Customer Agred Remuneration' (CAR). However the biggest barrier to this is seen in recent FOS adjudications where the adjudicator takes the view that if fees are contingent on the purchase of a financial product, then the adviser is biased in advance and will only getpaid if a product is bought.
Entrust Financial Planners Ltd	This is unrealistic given the huge costs and business risk faced by advice firms. Clients have been squeezed as hard as possible already in an attempt to remain profitable.
Essential IFA	We operate on a multiple income source i.e. initial fees, percentage of investment and ongoing management fees. The banning of commission from investments although in essence was a good idea, has made the advice gap even bigger due to the fact that somebody wishing to save 100 per month, can no longer get good quality face to face financial advice due to it being uneconomical for the financial advising firm. It is also arguable that adviser practices are no longer able to cross subsidise from their wealthier clients to their poorer clients which was probably the case pre RDR. This is of course good new for wealthy clients but has a massive negative effect on normal general public. After all, a client investing ??1m where the initial fee would be 30,000 for example may be able to afford this fee but a client investing 25,000 and charged a minimum fixed fee of 1,000 is paying a higher percentage due to minimum costs to the adviser firm. We also have to take into consideration the potential liabilities to the practice when looking at cost of advice as I would argue that 1m investment does hold considerable risk to the practice if the advice is later found to be incorrect. Many would question why adviser practices are still charging percentage fees. My simple response to this is liability and of course profitability.
Esteem Money Ltd	A business must understand what it's break even point is for providing advice or a service, and decide if it wants to engage with a potential client. If you don't understand your own business then your fee structure lacks integrity
Financial Foresight (NI) Ltd	No
Forward Plan IFA Ltd	it is down to the individual firm to set their fees and the market will decide on whether this is too high. a fee that can be set against a contract when a regular contribution, that is paid upfront as a loan by the contract to the client should be available. this may help the less affluent afford advice. the loan repayments could be deducted over the first year. If the contract is cancelled before the loan is repaid then any residue value in the contract is paid to the provider and the client is responsible for any outstanding amount as with any normal loan.
Halebarns Financial Planning Ltd	Firms seem to think producing glossy brochures and reports allows them to charge higher rates.
Hall Financial Planning LLP	Factoring should be allowed for regular savings in order for advisers to encourage savings for younger clients.
Highclere Financial Services	No

Respondent	Q14: Do you have any comments on the different ways that firms do or could cover the cost of giving advice (through revenue generation or other means)? Do you have any evidence on the nature and levels of costs and revenues associated with different advice models?
Intelligent Pensions	For the mass market, a purely fee based approach (whether fixed fee or 'time cost') is simply not attractive. As indicated above the cross subsidy that was inherent in the previous commission system could be encouraged through increased use of contingent fees under the existing adviser charge regime, financed through the product. Having been involved in selling financial products since the early eighties when everything was commission based, it is very clear that those clients who elected to proceed with a product were entirely willing to bear a higher cost, and understood and accepted that commission was a cross subsidy system. In the need to encourage increased retirement savings this might be facilitated through the encouragement of a new FSAVC market, perhaps based on stakeholder rules for charges, that would enable scheme members to build a personal pot alongside their employer's scheme being encouraged to do so by advisers who know they will earn a 'success fee' for completion of the sale. With appropriate protections (such as the ability to suspend contributions without penalty and a charge cap) this could drive increased savings.
Investec Wealth & Investment	Here is the answer for Q13 and Q14: Firms traditionally used to and there was inevitably a subsidy between those who received advice via the sale of the product and paid a commission and those who did not take up the advice/product recommendation. The change in legislation and consolidation of advice providers has meant that there has been a paradigm shift towards fees, both initial and ongoing for advice whether a product sale is involved or not. This in turn has led to client segmentation and true analysis of revenue per client. For some firms the starting point of analysing the cost of giving advice to a client is in the physical cost of actual client take on, e.g. files, time spent, and admin. support, etc. with a premium for the take on of risk and some margin. There is some evidence that some advisers are also looking to provide additional services for existing clients to add value and strengthen relationships
Iwan Jones	No
James Hay Partnership (Janet Morville-Smith)	No comment
John Lord	The cost of advice is very front-loaded and there is no penalty for bad advice. Payment should consist of fixed up front cost for
Jonathan Davis Wealth Management LTD	No comment
Joslin Rhodes Lifestyle Financial Planning	have focussed my answers on those questions of which I have specialist knowledge and I have no specific comment for this question.
Katy Master	No comment
Lemonade LLP	Some employers can and do cover the cost of some advice, for example pension advice.
Lighthouse Financial Advice	no
Morgan Financial Ltd	There is only one legally dictated way of covering the cost of advice - fees. A fee of ??100.00 per hour is the minimum that makes advice viable. Most average people cannot afford this or do not value advice enough to pay for it. I am now having to say to people I will not just 'pop round' for a chat on their NHS pension at 7:00 pm for free. They seem stunned. This is because the way the opportunities for advice are being promoted now by the government (and historically) people don't associate advice with a cost. They associate the purchase of a product.
Morgans Ltd	We had and still have for certain tiers of advice a commission system that funded the cost of advice. This worked well for many but was abused by a few. The problem is that there is a conflict of interest between the profit motive of the providers and the interests of the consumer. Perhaps there are ways this model could be adapted to minimise previous abuses.
Openwork Limited	We have no particular comment to make on this point.
Park View FP Ltd	Fees being charged to clients is the only way revenue should be collected. However for low income earners perhaps a commission model could work.
PCM Asset Management Ltd	No
Penguin	no comments to add
Polygon Financial Ltd	Can only speak for Polygon. We offer pay as you go or regular reviews for retained clients. Which are funded via provider faciltated fees , direct invoices and retainer fees via standing orders.

Respondent	Q14: Do you have any comments on the different ways that firms do or could cover the cost of giving advice (through revenue generation or other means)? Do you have any evidence on the nature and levels of costs and revenues associated with different advice models?
Profile Financial Solutions	Our business model is to provide all advice free but to charge if the client asks us to implement the advice. Faced with a distrustful client who has low knowledge and engagement we believe this is the only model that can generate volume, scalable advice outcomes. In this context the actual advice needs to be looked at as part of an overall financial transaction and relationship.
Prosperity Wealth Management Limited	We feel that charging models seem to disadvantage smaller consumers particularly in the current low interest rate environment and there is little evidence that consumers understand the impact of charges on their investments.
Protection & Investment Ltd	Analysis of our business suggests that direct regulatory costs (FCA fees, FSCS levies, PI insurance, compliance oversight and monitoring) add around 150 per new client taken on. The additional costs of due-diligence, suitability, record-keeping, compliant communications etc adds an additional 300 minimum. Add to this time spent with those clients and a profit margin and there is a minimum fee of around 600 per client, for even the most basic requirements. For clients with a need/want for an ongoing relationship the basic minimum annual cost is around 400-500pa.
Richmond House Group	The majority of firms use adviser charging to facilitate fee payments. Any threat to this and a move to direct client fee payment will have a catastrophic effect on the provision of advice.
Rob Coote	By segmenting them into those who want a low touch model by way of phone or robo advice and those who want a more hands on approach with higher costs.
Rowley Goodall Ltd	No comment
Royal Mail	This is not a topic on which the Keep Me Posted campaign is able to provide a response.
Simplified Money Ltd	If advisers are able to supplement the cost of advice through other means eg: product sale as the robo-advisers are does that not leave the industry open to the same potential abuses that we have spent the last 30 years trying to clean up? (Not that I have any objection to the way robo-advisers work, as long as they are clear about the limitations.) Myself and the team here have a business plan which does have costs and revenues associated with a mass market advice model. This is being streamlined as far as we think is possible in the current climate but I would not wish to disclose the details here as we are yet to get to market. I can say that after staff costs, the (total) FCA levy is the next biggest overhead by a margin over everything else.
SK Financial	Yes. Firms are trying to wean themselves off the large initial fee model and focus on the revenue that is generated by the ongoing adviser fees. Private banks have been successful in this approach. This is a more sustainable business model
South West Financial Planning	Increasing costs are ultimately borne by clients. We try to gain efficiencies elsewhere, through supply chains etc but ultimately we have had to close our small firm to directly authorized firm to a larger national firm to control costs. I do not believe this was really beneficial to my clients.
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	Make clear the cost of regulation in remuneration disclosure
Sussex Independent Financial Advisers Ltd	No comment

Respondent	Q14: Do you have any comments on the different ways that firms do or could cover the cost of giving advice (through revenue generation or other means)? Do you have any evidence on the nature and levels of costs and revenues associated with different advice models?
Swallow Financial Management LLP	My regulatory and associated compliance costs represent 19% of my total income and they are variable! They do not include adviser/supervisor man hours nor office space/costs if these were included they would represent approximately 48% of my gross income so try there. As an advice model because of these costs we can not afford to operate any cheaper models other than face to face and we are not prepared to try!.
Taurus Global Financial Advisers Ltd	None.
The Minster Partnership llp	Firms tier their advice options to cater for different levels of client needs.
Tom Orchard (Annetts & Orchard)	We do undertake elements of pro-bono work, including subsidised fees for low earners to allow them to get advice. The compliance advisers in the marketplace have always warned us against this as not TCF. We believe that it is completely fair, so continue, but this would scare off many firms. The regular should make it clear their own view on this, not continually allow the rumour mill to decide. As for other revenue streams, completely impossible and the ridiculous confusion over inducementshas even meant we have to buy our own coffees, teas, lunch etc when attending CPD, which is of benefit to our clients to attend. Quality firms complete much more CPD than the minimum requirements. The regulator should allow the deep pockets of providers and product manufacturers to supplement the distribution sector, as it is a far more time consuming and difficult arena. Otherwise its simply more corporate profit for the manufacturers and no client benefit at all. Also the confusion adds cost to monitor.
True Potential Wealth Management	No comment
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	Clearly every firm must consider its own costs, structure & ability to make a profit. Ever-increasing & unplanned for levies make this an incredibly challenging task
Wishart Wealth Management Ltd	Have witnessed that for full financial planning (real planning with cashflows, tax advice etc) and ongoing advice/planning and support services, initial costs 2000 to 3000 for The Plan, 1% to invest lump sum and 1% fee per annum of invested assets ongoing - subject to minimums of around 2500 for real financial planning. These amounts often reduced for larges sums (500k+). We seeing more fixed fee advice rather than % assets managed - including minimum and maximum fees. Fees are for the market (client/adviser) to decide - not regulators or government.

Respondent	Q15: Which consumer segments are economic to serve given the cost of supplying advice?
2plan wealth management Ltd (Chris Smallwood)	The fees and the levies are obviously the more visible and ascertainable costs, yet the real cost of regulation is ensuring that you dont get it wrong. The uncertainty surrounding liabilities means that advisers are driven to using lengthy disclosure documents with an eye to future risk mitigation. The sheer volume of different disclosure requirements together with the fear of falling foul of the rules inhibits investment and innovation in the market. It means firms structure their business in order to manage liabilities rather than being open to more innovative ways of providing advice. Simplified or focused advice models would clearly cater for a wider market, but the development of such services is inhibited by concerns around how FOS would treat them in the case of consumer complaints. The uncertainties around liabilities, including the lack of a long-stop, are a major barrier to investment. The consequence of this is that firms remain small and fragmented and therefore are unable to become more efficient and cost-effective by, for example, introducing more stream-lined services and economies of scale. Without investment and innovation in the advice market, a large number of consumers will remain unable to access affordable advice.
Abi Stidworthy	No comment
Active Wealth Ltd	Those that have wealth.
Advantage IFA Ltd	From your list and in the current regulatory climate, Busy Achievers Affluent and ambitious Mature and savvy Retired with resources
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	Retired with resources Affluent and ambitious Mature and savvy
Aspire Online	Maybe stretched but resourceful, busy achievers, affluent and ambitious, mature and savvy, retired with resources
AXA Wealth	The cost depends on the type of advice and its complexity. Generic advice costs less than a personal recommendation. Categories from Stretched but Resourceful should be generally viable irrespective of the type of advice. Below that probably not. However, it is open to question whether the current advisory market, predominantly small to medium size firms, will see a benefit in supplying advice to these consumer categories. New mass market alternatives will need to be encouraged to the market to plug the gap.
Barra Gorman	Higher end of socioeconomic scale economic to serve Lower end could possibly receive guidance with referrals to advice when necessary
Berkeley Burke Group (Andrew Emery)	Without using "robo advice" technology, or automation of some type, it is likely that the only consumers who can afford to utilise "Professional" financial advice are those that can be designated as Higher Net Worth individuals (HNW), or Sophisticated Investors (SI). The advice gap has been created by the introduction of RDR and its resolution may require something equally as far reaching.
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	No comment
Blue Scapes	No comment
BPH Wealth Management LLP	Due to the need to ensure advice is compliant, there are high initial costs which need to be covered, part of which are the regulatory fees involved. This means that it's not possible to provide wide ranging holistic financial advice to the mass market currently.
Brighton Financial Ltd	RETIRED WITH RESOURCES AFFLUENT AND AMBITIOUS BUSY ACHIEVERS

Respondent	Q15: Which consumer segments are economic to serve given the cost of supplying advice?
Broad Wealth Management Ltd	We find all segments are economic to serve. If it is highlighted what the fee structure is at an early stage, the consumer can decide if they wish to continue. I think this is why the larger firms are unprofitable as they have the larger fixed costs and therefore pass this on to consumer.
Browning Financial Planning Ltd	no comment
Caleb Roberts Financial Management Ltd	Retired with resources, mature and savvy, affluent and ambitious.
Caledonian Financial Management Ltd	The consumer segment is immaterial if clients are charged for the services they use and if the costs for those services are commensurate with the work that will be carried out for the client. It is becoming more difficult to keep the cost of advice reasonable because of the rise in the cost of regulation, namely the rise in FSCS fees.
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	Clients with financial needs who are willing to pay for regulated advice and with investable assets of around 100,000 and above.
Chattertons	HNW for advice.
Citygate Consulting Limited	Assets of 100k +
Close Brothers Asset Management	No comment
Combined financial Strategies ltd	moderate to high networth.
Cranbourne Financial LLP	Higher net-worth segments, with probably >100,000 investable assets, and or income >50,000 per annum.
D Shearer	Need methods to allow less well off to be enabled to take part.
Dean Robertson	no comment
Douglas Baillie Ltd	Only High Net Worth with 100,000 or more to invest. Or others in lower income groups with pensions consolidation or at-retirement needs > ??100,000 but with no means to pay for advice other then from the resulting product. this leads to a confliect of intersts between the best avice and getting paid for that advice. advice 'not to do something, and retain an exosting plan is non-remunarative, and customers are understandably reluctant to pay for advice to do nothing!
Entrust Financial Planners Ltd	We are willing to serve any consumer who can pay our fees, however we also have to balance that with will we be able to add more value than we charge. Often the answer may be n we can't so we don't take the client on. Unfortunately the consequences are that we probably only deal with consumers with a combined household income of 80,000+ or assets of 300,000+.
Essential IFA	NA
Esteem Money Ltd	All can be supplied if the proposition is clearly costed and understood.
Financial Foresight (NI) Ltd	All can be, depends on advisers preference, focus and proposition
Forward Plan IFA Ltd	all as long as they are aware before commencing that there is a cost.
Halebarns Financial Planning Ltd	Ant consumer segment is possible to serve if charging structure is set at the right level. For example it costs no more to set up a bond investment for 100,000 than 500,000 yet at the industry nor of 3% one costs 3,000 and the 15,000. daylight robbery!
Hall Financial Planning LLP	Those with investible funds of ??50k+
Highclere Financial Services	To compile a financial report for any client would be a minimum of 750. It could well be higher if the client's affairs are complex. Not many, other than high net worth, will be able to contemplate such an outlay.

Respondent	Q15: Which consumer segments are economic to serve given the cost of supplying advice?
Intelligent Pensions	It's quite evident that the high net worth market has been the primary target for financial advisers for years, people with accumulated wealth whether in their pension funds or in person or both. This has led to a reduction in the supply of advice to the middle income mass market
Investec Wealth & Investment	If a firm believes that they need a minimum of 1,000 fee for client take on then the segment of the market to which they will gravitate are those who will see the value in a minimum 1,000 fee for advice this would suggest socio economic groups A and B
Iwan Jones	Everyone should be economic to serve
James Hay Partnership (Janet Morville-Smith)	No comment
John Lord	no comment
Jonathan Davis Wealth Management LTD	No comment
Joslin Rhodes Lifestyle Financial Planning	Consumers with existing assets/pensions etc.
Katy Master	No comment
Lemonade LLP	Currently wealth managers tend to offer advice to the last 5 segments with their preferred clients falling in the Mature & Savvy and Retired with Resources categories as these are the segments with assets to invest
Lighthouse Financial Advice	as mentioned above
Morgan Financial Ltd	Advisers need people with wealth. It is a sad fact, as our charity can see. Financial advisers are 100% in the commercial sector. Like any other capitalist business. I feel the objective of the FCA is looking to see advice as part of the charity systems. The cross over is impossible.
Morgans Ltd	The first four segments are likely to be the least attractive from an economic perspective. For the others if we assume they want face to face advice it depends on where and when they want it.
Openwork Limited	The first few categories (Starting Out, Living for Now, Hard Pressed) are the least well served by the current market as they struggle to access professional financial advice post RDR due to the higher entry costs of advice. New solutions that involve simplified models need to be targeted at these segments. Simplified models also need to be aligned to lower levels of advice risk for the supplier which genuinely mitigates against speculative redress claims whilst continuing to meet TCF principles. The wealthier segments/retired are much better served by the current market as they have more assets and more willing/able to pay for professional advice, in addition the level of complexity of products and solutions increases the closer consumers get to retirement choices and the more wealth that consumers have - given the complex tax regime in the UK. As a broad-based business, we also have over 1,300 advisers operating in the mortgage market, where a far wider range of segments can be economically serviced. This too is becoming harder as the requirement to (rightly) demonstrate and document the advice given is becoming more onerous post the mortgage thematic review. Ultimately we believe there should be industry wide aspiration for all consumer segments to be capable of being catered for with sensibly differentiated advice propositions. Question 7 also covers this.
Park View FP Ltd	For us as a firm we need clients that we can add value to and make a difference and where they can also afford to pay a fee. We view assets in excess of 100k and income in excess of 50k as out starting points. For other who don't meet this criteria we guide to other areas like MAS.
PCM Asset Management Ltd	No
Penguin	Unfortunately the introduction of RDR has made the advice profession gravitate to "wealthier" clients and people with more "sophistication" No one wants to help those who are easily swayed by PPI companies next bad luck campaign or those who cant afford to pay fees or dont have wealth that they can charge a fee to the product for. Advisers struggle with charging someone a fee to set up an regular savings plan

Respondent	Q15: Which consumer segments are economic to serve given the cost of supplying advice?
Polygon Financial Ltd	Both
Profile Financial Solutions	In a volume technology and telephone based advice business model there are theoretically virtually no segments it is uneconomic to serve. The key riders to this statement is that for some segments to be economic acquisition costs must be low and the client must at least have some prospect of being in the market for a financial transaction.
Prosperity Wealth Management Limited	From our perspective it is those clients with the least financial affordability that are being charged the highest percentage fees in order to make this an economically viable proposition. It would seem that those consumers at the wealthier end of the spectrum are more economic to serve.
Protection & Investment Ltd	Generally, consumers with higher incomes and/or assets of ??100,000+ are those that are economically beneficial to us as a firm and to whom the costs of advice generally make economic sense. However, as advisers we would prefer to be able to service different types of clients in different ways in a format which is profitable to us and beneficial to them. Reluctantly we have to turn many enquiries away as we would be subject to significant financial loss on business conducted.
Richmond House Group	Advisers no longer provide long term savings advice to the young or seek clients with less than ??50,000 investable assets.
Rob Coote	Those who can afford 200 per month into a pension &/or 15,000 into an ISA
Rowley Goodall Ltd	No comment
Royal Mail	This is not a topic on which the Keep Me Posted campaign is able to provide a response.
Simplified Money Ltd	The HNW segment is obviously economic prices charged currently reflect both the amount of work and the benefit that advice offers. We believe we can run an economically viable business for the mass market albeit that would be even easier with some additional reforms but this will need us to use a lot of technology and our customers will be tightly targeted. We will not be able to offer advice to clients who deviate from a specific set of needs or above a certain level of net worth. Consequently, even if our business does prove itself viable, there will still be some people in the advice gap that need something neither we nor traditional advisers can currently offer economically at the price they are willing to pay.
SK Financial	Those that can afford to pay for advice.
South West Financial Planning	Those with investable assets in excess of 150,000 and/ or household incomes above 50,000 per annum
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	no comment
Sussex Independent Financial Advisers Ltd	na
Swallow Financial Management LLP	People who are comfortable with the fee concept and have at least 75,000 to invest, no regular premium business.We used to complete 20 - 30 mortgages per month pre RDR now we complete approx. 20 per annum! Good customer outcomes!
Taurus Global Financial Advisers Ltd	Those clients with 50,000 of investible assets or more.
The Minster Partnership llp	Retirement planning Lump sum investments Personal Protection needs

Respondent	Q15: Which consumer segments are economic to serve given the cost of supplying advice?
Tom Orchard (Annetts & Orchard)	It is all down to those with the ability to pay the advice fees, initial and ongoing. Financial services firms have been encouraged to focus on being a profitable business, which is ok as long as its not the only driver. They are also mistaken in thinking that building a proposition to look like a law firm is a good business model, they are wrong. Lawyers are transactional by nature, have no recurring income or value to their clients and are unprofitable in all but the real high end corporate markets. They also are not trusted advisersbut are in fact only called in when a necessity occurs, consumers should not treat financial advice in the same way, which is a long term process that needs to be tweaked and adapted and relies on complete trust and understanding from both parties.
True Potential Wealth Management	As mentioned previously I prefer not to put clients in segments.
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	Only those who are sufficiently wealthy & educated to see the value in paying the significant cost of professional advice
Wishart Wealth Management Ltd	Retired with capital (200k+) High earners (100k pa +) Those that can afford the fees and love and respect what we do for them and their families. Ultimately those with capacity to create wealth, capacity to benefit from our services (net of fees) and pay for the services.

Respondent	Q16: Do you have any comments on the barriers faced by firms providing advice?
2plan wealth management Ltd (Chris Smallwood)	The barriers faced by firms in providing advice. In essence these amount to; o the liabilities and uncertainties that attach to investment advice: o the lack of a longstop; o the uncertainty and systemic problems with FOS; o the ever-increasing and unpredictable FSCS levies; o the impact of professional indemnity insurance; o the complexity of the handbook. For investment advice in particular, the costs of getting it wrong are significant and ultimately these costs are borne by clients, pushing the provision of financial advice out of reach of a large number of consumers.
Abi Stidworthy	The cost of regulation and its related activities is a massive burden and considered an ongoing barrier and risk to advisers .
Active Wealth Ltd	Time to recruit and cost to recruit.
Advantage IFA Ltd	Your APFA 2014 figures for the regulatory cost of providing advice are out of date and no longer worth the paper they are written on. Two main barriers in my view. Most new client cases now take around 3 days of adviser time from start to finish, much longer than before because of the extra paperwork required. (I know the FCA say that a report only needs to be basic and concise but that is not what we are told by compliance and more importantly PII). Unknown liability - why should I do risky work for a client, which could be ultimately the right thing for them to do, but in 10 years time could easily end up in a mis-selling scandal. SO why take on that risk, my family home, my child's education and upbringing, my retirement plans and dreams, all to help someone who approaches me from Pensionwise with the idea of transferring out of their FS scheme to a PPP. For the 2,000 in initial fees I might charge it is simply not worth the risk.
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	Recruitment (as per Q10) Record keeping and reporting requirements (eg Gabriel data) Too frequent regulatory changes (e.g. RDR ??now followed by MIFID2)
Aspire Online	The unlimited annual FSCS levy is a scandal, it is unfair and immoral and if those in control i.e. FCA employees had the same unknown liability on their annual income they would change the rules. For may IFA firms this excess comes out of the pockets and take home pay of the principals. Its not like the banks where everyone gets paid and this fine is out of profits or shareholder dividends. The lack of long stop is also iniquitous
AXA Wealth	From AXA Wealth???s perspective the key factors are: ??? Regulatory clarity ??? Regulatory cost ??? Liability for advice. The regulatory framework under FSMA should be simplified. For example, amend the regulated advice activity of advising on investments??? (Regulated Advice) to closer reflect the MiFID definition of ???advice??? i.e. that it requires a personal recommendation based on the personal circumstances of the consumer. Suggested category headings: ??? Information: This is essentially what is understood to be generic advice. ??? Regulated Personal Recommendation: This category would include both full and simplified advice where a personal recommendation is provided. The description aims to provide a distinction between information and a recommendation. The term ???regulated??? indicates the additional controls, complexity, cost and protection attached to that category.
Barra Gorman	Uncertainty over ever increasing costs and liabilities. General feeling that odds are stacked against adviser if client decides to complain. Complaint often at encouragement of a commercially motivated third party CMC

Respondent	Q16: Do you have any comments on the barriers faced by firms providing advice?
Berkeley Burke Group (Andrew Emery)	As previously commented: a) increased regulation b) increased overhead costs such as the FSCS levies c) increased time costs caused by perceived over regulation d) increased perceived risk of immediate and ongoing liability to redress e) increased qualifications sought (although the increasing requirement for enhanced qualification has arguably professionalised the industry, and it can also be argued that advisers should be qualified to Chartered status as a minimum) f) increased costs of I.T. to meet the ever-growing demands within an industry that has only recently begun to explore the true opportunities for technology g) increased cost and availability of Professional Indemnity insurance. It has reached an almost laughable position of self-insurance now! h) the ever increasing costs of Corporate Governance, Corporate Risk and compliance In light of the above and the short fall of provision, the Regulator must provide an environment that encourages and incentivises adviser recruitment and provision of advice to those that need advice, but cannot access it. The rapidly increasing FSCS levy perpetuates the advice gap problem - Smaller firms could struggle and we will could see more advisers leaving a profession which is increasingly becoming more difficult to make a living from. The result being a non-participant???s ability to find financial advice will be further undermined and advisers will continue to serve wealthier clients, thus disenfranchising the mass market and expanding the advice gap. It is also thought that too high/an ???unbalanced??? premium is paid by firms that offer advice and/or products which are not ???high risk??? in respect of potential FSCS claims. A solution could be a product or risk based levy ??? Thus the higher risk of a specific product, or service, the higher the chance that the firm selling it has of folding and, its liabilities falling on the FSCS. These products should be given a higher risk weighting and be asked to contribute proportionally more to the FSCS to fund compensation. With funds paid in advance and based on volumes of business submitted. ??? Alternatively, or in conjunction with the above measure, a levy could be attached to the income derived from the transaction and sale of a product, added to the product???s price and paid for by the client (risk-weighting the FSCS funding model.) o These customer levies can be uniform, for simplicity, or higher levies could be charged to unregulated or higher risk products. There are obvious issues to contend with in implementing a risk weighted FSCS funding model, these are - o The levy would need to be matched to the FSCS???s needs under a pay-as-you-go system, as the FSCS currently raises no more through its levy than it expects to pay in compensation. o Providers would likely pass the cost of the levy onto advisers or clients through higher upfront or ongoing charges. o The risk-rating methodology would also be open to dispute with questions likely to be raised about why certain products or market segments are deemed higher risk than others. Barriers that inhibit provision of simplified advice ??? The FCA terms simplified advice to constitute ???Advice that is limited to one or more of a customer's specific needs and does not involve analysis of the customer's circumstances that are not directly relevant to those needs.??? Low-cost simplified advice can greatly help advisers provide advice solutions to current non-participants, thus narrowing the advice gap.
Berkeley Burke Group (Tony Durant)	
Blevins Franks Financial Management	The FOS position for firms can only be addressed by a difference in the COBS rules between personal recommendations and other advice.
Blue Scapes	While I wholeheartedly support the demise of the "iffy" advisor, there seems to be an increasing amount of political intervention and meddling which could deter those who are doing what they are supposed to well, from doing anything at all, and possibly leaving the profession.
BPH Wealth Management LLP	One of the principal considerations for a firm in taking on a client is the potential liability that comes with advising them and the balance of risk and reward. For investment advice in particular, given the sums involved, the cost of getting it wrong are significant. The growth of a compensation culture has had a considerable impact on advice firms from the cumulative effect of FOS compensation, FSCS levies and Professional Indemnity insurance. This has prevented firms from investing in greater capacity, expanding and innovating.
Brighton Financial Ltd	Attracting clients that are willing / able to pay for advice and who would genuinely benefit from it.
Broad Wealth Management Ltd	Main barrier is our regulatory costs and the unknown on how they will increase Would like to see a risk based levy on advice instead of all firms paying for the mistakes of other advisers.
Browning Financial Planning Ltd	Yes. paying massive FSCS fees for claims on unregulated products provided with regulated financial advice. Dodgy firms are being allowed to rake in huge commissions, then the scheme collapses, the firm shuts, liability fall on the good guys via the FSCS and the the directors phoenix as a new firm. It should me made clear that FSCS protection is only given on regulated products from regulated advisers. If a regulated adviser gives advice on unregulated investments, there should be an FCA legal requirement for a industry wide disclaimer statement signed by the advisor and client to let them know they will not have FSCS protection. For an adviser to submit the business without this should be a criminal offence, with their personal assets recovered to make up any financial losses of the client. THAT THIS HASNT BEEN DONE IS AN ABSOLUTE TRAVESTY OF JUSTICE. All these other questions are just scratching the surface. THIS IS THE REAL REASON WHY THE COST OF ADVICE IS GETTING HIGHER AND HIGHER.
Caleb Roberts Financial Management Ltd	Costs of regulation (FSCS), PI costs, not able to earn enough from other groups outside of the above mentioned. This is where commission worked.
Caledonian Financial Management Ltd	As mentioned above, one of the barriers faced by firms is the rising cost of regulation.
Carolyn Callanan	No comment

Respondent	Q16: Do you have any comments on the barriers faced by firms providing advice?
Chartered Financial Management (UK) Ltd	The FAMR CfI Oct 2015 document outlines the main barriers, but probably the most significant barrier faced by firms providing advice is the regulation of the industry. This is not a negative ???barrier??? as it is vital that consumers are protected and treated fairly. The need for firms to employ technical and compliance support/staff in order to meet the regulations is only the start of where this barrier has an impact on firms. The associated employment costs and operational costs with running a business then drives the need for efficiencies with internal processes and further segments the type of clients that would be commercial for the firm to deal with. On top of this, is the ever increasing restrictions placed on firms by the professional indemnity insurers. The insurers are able to restrict the business model through exclusions or excesses which ultimately shapes the way in which the firm will operate in future. Furthermore, the potential future threat from claims management firms looking to exploit any weakness (and thereby damaging our PII profile) also drives the need to ensure that every stage of the advice process is well documented, recorded and justified ??? in many cases this is probably in excess of what the FCA would require.
Chattertons	Compliance - complaints - no protection against future complaints
Citygate Consulting Limited	Unless you have an existing client base and have potential clients that will pay large initial fees, it is almost impossible to start a new business.
Close Brothers Asset Management	na
Combined financial Strategies ltd	Yes, the cost of FCA and FSCS Levies is massive along with capital adequacy requirements. What the FCA fails to understand is all the other costs we suffer after their explicit fees compliance teams, Networks, PI costs. Most adviser firms are micro-businesses and it seems that the FCA is trying to drive us all into Networks or joining bigger firms to make their job of regulating easier. However, All they are actually doing is increasing the risk of bigger corporate failures (like Honister). Remember the safety of numbers can create bigger risk taking. Currently the Levys and Capital adequacy will make it very hard for new start up firms with only one or two RIs to be viable.
Cranbourne Financial LLP	High cost of complying with regulation means that we have to charge high minimum charges for advice and high fees. This includes needing to employ staff to complete administration, paraplanning and compliance largely to comply with regulation
D Shearer	Over-regulation, costs of paperwork/regulatory systems, need for indemnity insurance?
Dean Robertson	The cost of regulation and its related activities is a massive burden. Your estimates are reasonably accurate, I would think most firms sit in the 12-20% of gross income as a cost when you add in fees, licences, back office MI collators, compliance consultants, time spent, case checkers and all the other activities. That is a silly amount, which after all is actually paid for by the client.
Douglas Baillie Ltd	1. the costs of Regulation 2. the Costs of PI Insurance 3. fear of FOS retrospection and subjective judgemnents of the regulations in favour of consumers. 4. the Cost of FOS 5. the cost of the FSCS levies
Entrust Financial Planners Ltd	Outcomes based regulation doesn't seem to be working. Myself and many colleagues believe that there is no clarity whatsoever over a firms regulatory responsibilities, just take a look at the FCA handbook for evidence. How on earth are small firms supposed to be able to find and implement anything from that document, it is terrible. If I issued a document written like that to my clients it would not pass the clear and not misleading principle. Regulation has pushed up the cost of PII and it has so many exclusions on it to be virtually worthless to a business and therefore increasing business risk. Finding consumers is not a problem for a professional firm. Establishing reputation and trust is also possible, but the regulator should do much more to promote a positive image of the industry and help firms establish this much more quickly. Again, VouchedFor has done more for the credibility of the industry in 3 years than anyone else in the past 20 years. If the cost of regulation was brought back to a sensible level (30% of where it currently sits), then other business costs would not be a barrier at all. ?? Liability has to be factored into both barriers to entry and also as a built in cost for each piece of advice, which adds a barrier to advice for consumers. Contrary to the call for input document, sometimes advisers are liable when giving advice in good faith (Arc Cru for example), where they often take the rap for the mistakes of others (custodian and regulator). As firms, we feel that the liability along with regulatory cost are the two issues causing many people to leave the industry. Reducing regulatory costs and providing a longstop would remove the two biggest barriers and may well see thee advice gap closed considerably. Advice is one of the few industries where firms cannot make a profit from lower value consumers. This has to be related to costs for firms.
Essential IFA	The sheer amount of paperwork involved in giving financial advice has become a real burden. This is partly due to the ever increasing claims management firms which financial advisers are forced to protect themselves from. If there is one change in regulation that I would request the FCA to do, it is to put a reasonable doubt clause into regulations. After all a financial adviser that produces a 30 page on a clients financial circumstances can still have a complaint uphold by the FOS due to the report being too complicated. This obviously represents a catch 22 for advisers as if we simplify the report, the claims management firms state that we have missed important information and therefore a claim is valid and the FCA and FOS state that the report if covers all bases, is too complicated.
Esteem Money Ltd	No
Financial Foresight (NI) Ltd	Cost of regulation (especially FSCS increases) unduly affecting fees to be charged and lack of long stop affecting development of new adviser entrants. Both issues create a barrier to mass market advice.
Forward Plan IFA Ltd	No comment
Halebarns Financial Planning Ltd	there are no barriers in my opinion. Offer consumers a fair deal and they ill trust you forever.
Hall Financial Planning LLP	Regulatory costs. Lack of long stop. falling adviser numbers and cost to train new advisers.

Respondent	Q16: Do you have any comments on the barriers faced by firms providing advice?
Highclere Financial Services	The major barrier is regulation. The mushrooming regulatory fees in tandem with the loss engendered by the regular Gabriel returns creates a major outlay which means that firms outgoings are substantially higher than pre-regulation or even that of fifteen years back. The ever-present fear that today's acceptable advice becomes tomorrows new mis-selling debacle is another barrier.
Intelligent Pensions	Many advisers I speak to are unfamiliar with the options of focused or simplified advice, or have been distrustful of this 'slimmed down' approach, fearing that it could result in increased claims. I believe it is essential the that regulator educates the public and adviser community better, thereby encouraging greater use of this lighter advice model, but it will only be with clear rules and confidence in the FOS interpretation of these that this will take place.
Investec Wealth & Investment	In addition to the barriers highlighted in the document, one of the additional factors is that it is becoming more difficult to find experienced, highly qualified practitioners in the market who are able and willing to provide regulated advice particularly to high net worth individuals. There are a number of reasons for this; firstly a number of individuals have left the industry because of cost such as PI cover, secondly increasing risk and regulation and fear of ???getting it wrong??? and being sued and thirdly the age profile of the typical adviser. It is well documented that not enough younger advisers are coming through and this is impacting on the ability of firms to provide widespread advice.
Iwan Jones	Fear of being sued is meaning many are leaving the industry
James Hay Partnership (Janet Morville-Smith)	No comment
John Lord	No comment
Jonathan Davis Wealth Management LTD	No comment
Joslin Rhodes Lifestyle Financial Planning	No comment
Katy Master	No comment
Lemonade LLP	We would agree with the barriers stated
Lighthouse Financial Advice	cost of regulation
Morgan Financial Ltd	The risk of complaints are high even though we believe we are doing the right thing. The costs are very high. 8,000 I pad the FCA this year and PI Will be over 3,000. It costs me 15,000 to 20,000 per annum to be an adviser. Someone has to pay this. For info it was suggested to me by a firm that was IFA firm of the year that I should come and work for them and pay them 90,000 a year for a desk and service from them. Can you imagine what I would have to charge a client on that basis. The financial pressure to produce on advisers working for firms is tremendous.
Morgans Ltd	Long stop has been much discussed and would help firms to at least have a time limit on potential liabilities.
Openwork Limited	High costs on entry as commented on already and increasing running costs as a result of the FSCS levy in particular. These costs have got completely out of step with operating profitability of advice businesses and in the case of the FSCS levy are impossible to properly budget for. The costs can only be recovered by increasing the costs to consumers, making the advice gap issue worse. Complaints management remains a high barrier to expanding advice. As customers can complain with impunity, however frivolous it may be, each has to be managed, investigated, replied to and in some cases engaged with other agencies.This cost has to be borne by all customers. For example, despite our track record (low volumes of complaints as a proportion of incoming business allied with low rates of FOS overturns) we receive ongoing complaints about products (such as PPI) that have never been advised upon by Openwork. This is now being exacerbated by the proliferation of speculative claims generated by claims management companies looking for new opportunities post PPI.
Park View FP Ltd	Regulation is a concern in that we feel as it changed we are being judged retrospectively. The cost of levy's and regulation is clearly a concern if it continues to rise Claims management firms encouraging spurious claims is also a worry No longstop so effectively I carry my advice to my grave at the moment - surely this is not correct
PCM Asset Management Ltd	Yes. FSCS fees are the biggest concern, and prevent us from concerted efforts at expansion, as we will be taxed for increasing turnover.
Penguin	yes - as before - introduce a long stop, look at commission of some form on lower end savings products and advice - give firms incentives to give pro bono work(maybe a reduction in fees or levies if a certain amount of volunteer work is done) Revisit the independent v restricted titles
Polygon Financial Ltd	Impact of fees we face impacting upon range of clients due to their affordablity re us. I.e FCA, FSCS (unexpected interim levies where a firm, such as ours, has never advised upon any of the product areas the levy relates to.) Overly heavy reporting, constant requiremetnt for change due to EU directives, including retrospective and immediate (same day) moving of goal posts.
Profile Financial Solutions	We do not believe there is a cost or profitability barrier per se to delivering volume technology and telephone based advice. The main barrier is acquiring clients - and if this gets too costly this can make transactions unprofitable/unsustainable. The complexity and regulatory risk associated with some drawdown advice/options can also act as a barrier to advising at retirement.
Prosperity Wealth Management Limited	Regulatory fees, specifically the FSCS levy are the greatest and increasing barrier faced by many firms and this needs to be addressed. Financial products can have a long lifetime and it is incumbent on the advisers to ensure that clients have a clear understanding of the products they are buying and receive regular reviews to ensure that these continue to meet their changing circumstances. Financial strategies should be capable of adapting to changes in circumstances and legislation in order to ensure that clients needs are at the centre of the advice proposition. I do not believe that the introduction of a long stop enhances the client proposition.

Respondent	Q16: Do you have any comments on the barriers faced by firms providing advice?
Protection & Investment Ltd	The key barriers for advice firms are regulatory costs and liabilities. Since 2008/09, our turnover has increased by 2.5%pa but our total regulatory costs have increased by 7.8%pa, with direct regulatory costs (FCA and FSCS) increasing by 10.5pa. The result of this is that our gross margin has declined by -1.7%pa. There is only so long that advisory businesses can continue to see such regular and significant regulatory cost increases before more go out of business, increasing the strain on the FSCS and further decreasing consumers access to advice. Lack of regulatory clarity, particularly between the regulator and the ombudsman, combined with potentially unlimited liability for life, are significant issues for existing firms and huge barriers to entry for new firms entering the market.
Richmond House Group	There are several barriers, uncertain liabilities when providing advice, the unreasonably wide scope of the FOS, the lack of a long stop, the FSCS levies that make it impossible to budget accurately and the sheer complexity of the handbook. One would expect, in the absence of definitive rules in the rulebook, that an advisers honest best endeavours will be sufficient but it isn't. The fact that an adviser carries liability to his grave is an outrage.
Rob Coote	Costs of PI Insurance and over regulation
Rowley Goodall Ltd	Many advisers are not experienced at dealing with employers and do not think about this alternative. Many employers will pay advisers to be available for workers once a year.
Royal Mail	As identified in the FCAs Financial Advice Market Review (FAMR) document, one of the most acute barriers faced by those providing financial advice is finding consumers. As highlighted, some consumers lack a clear understanding of how best to manage their financial resources and this can present challenges for those seeking to identify those in need of advice. On this point, the Keep Me Posted campaign would emphasise that it is important to recognise that many consumers can most effectively be engaged with using traditional media, including hard copy mail. Research conducted by London Economics on behalf of the Keep Me Posted campaign suggests that how information is received, by post or electronically, can also have a big impact on peoples understanding and the choices they subsequently make. This research suggests that people are more likely to understand information and make better financial decisions when they receive information by post, rather than electronically. For example, people were more than twice as likely to correctly identify how much money was in their account if they received the statement by post (82% compared to 32% who receive statements online). With this in mind, we feel it is essential that those seeking to provide financial advice endeavor to do so through the use of traditional hard copy mail.
Simplified Money Ltd	1. A lack of guidelines around how the FoS would view simplified or focused advice. 2. The unfairness of the FSCS levy on new entrants and responsible existing firms.
SK Financial	Yes. Increasing compliance costs and the financial power of FoS.
South West Financial Planning	Regulatory Clarity is the greatest issue together with ever rising regulatory costs. These costs impact on our liability now and the future, particularly with no long-stop resulting in ever increasing PI costs. These costs must be under control. Why is financial advice the only profession without a long-stop?

Respondent	Q16: Do you have any comments on the barriers faced by firms providing advice?
Strategic Investment Solutions Ltd (Chris Kilner)	It is interesting to look at the total cost of regulation versus the outcome. I am not sure the balance is at all right and you have what is a very expensive Regulatory Regime with considerable direct and in direct costs on Firms and open ended liability. The recent APFA SURVEY confirmed the feeling that costs have got out of control. My Firm direct and indirect Regulatory costs are 18% of turnover. I would put forward the idea that the cost oversight has got all too cosy and needs a new look. I would suggest the existing mechanisms and checks and balances do not work and not fit for purpose. The FCA is too powerful and unaccountable. Nothing Exceeds like Excess and when you look how the Regulator deals with challenges, you will see they almost always they act with impunity. There are many examples, The RDR review and answer to TSC recommendations before having received them. The Practitioners Panels seem to be ineffective. The recommendations made in the Statuary Annual reports are very rarely acted on, you have to ask what is the point. The Closed Book affair. The failure to control the costs of FCAs direct budget and the costs of the other component organisations such as FSCS, FOS and MAS. The UCIS crisis is an example of Regulatory failure in terms of monitoring risk, systems and control and policing the Market. The FCA (FSA) have significant resources, how could this have happened. How is the Regulator responsible and who has challenged them? The resulting Market Failure is Unacceptable and Massive redress costs heaped onto the IFA market where 90% of firms have never recommended a UCIS product. PI Market The PI market is NOT working nor fit for purpose. The failure of PI COVER is forcing firms into default. PI firms should be more accountable it is not just a market issue, the number of Firm failures because PI show the market is not working. A Review into PI and the subsequent failure of IFA firms should be carried out. Are there any consistent issues that result in failure of the PI cover and IFA firm? Policy denial, disputes becomes a legal matter between PI Company (large and resourced) and Small Firm. It is all too easy for a Firm to slip into default and the system should not allow this to happen easily. When you consider the cost of PI for the IFA Market including Premiums, Excesses and increased Capital Adequacy together with the cost Firm failure and default into the FSCS, there must be a more efficient way to organise the question of liability and cost.
Strategic Solutions (Michael King)	no comment
Sussex Independent Financial Advisers Ltd	The increasing regulatory cost, not only regulatory fees, but also the cost of compliance consultation and advice. Potential liability outweighs revenues generated. Fear of changing standards or practice being applied retrospectively to advice given years before. Difficulty and increasing costs of obtaining PI Insurance.
Swallow Financial Management LLP	Regulatory costs, the level of liability (long stop), Fictitious or frivolous complaints by clients/CMC & the amount of work & costs associated in defending them. The degree of documentation in providing advice both pre & post. I would not recommend this industry to any one, least of all my son who would be excellent in my industry.
Taurus Global Financial Advisers Ltd	Biggest barrier is the financial burden of regulation and the relentless pressure from rising FSCS and interim levies. This is unsustainable.
The Minster Partnership llp	perception of cost over added value
Tom Orchard (Annetts & Orchard)	Barriers that exist and hurt are firstly the negativity around the sector. Financial Advisers are unique in that they are thought badly of as a collective, but consumers with their own FA would tell you how fantastic they are, they see themselves as lucky and not the norm as they have negativity and bad press constantly rammed down their throats. We never get good news stories, we never get positive outcomes. British media has become lazy and uses the higher emotional reactions attributed to bad news rather than tell factual impartial stories. This is compounded due to the regulator never publicly standing up for the advice sector. As adviser firms tend to be at best a regional SME, there is no budget or point in them trying to stand up for the marketplace as a whole. Rather than the nonsense (failed) adverts for MAS, Pension Wise and FSCS, the consumer would be far better served with a program of explaining the benefits of getting quality regulated advice. On TV, radio, press and online. That is something I would imagine less advisers would complain about another levy being raised for. Also, the barriers to entry to being a financial adviser are huge, but that is not the only reason why new entrants dont join. We have entered a dangerous downwards spiral, as the advice gap grows, less and less people know what a proper financial adviser does, so less and less young people think about it as a career. Our firm has unilaterally decided on a program to inform local schools and colleges about the role of a financial adviser and the careers in financial services. This wont solve the problem though; the FCA needs to work with the education authorities and the professional bodies to get quality advisers in front of 16-18 year olds, and then again in front of University students. Finally, the cost of regulation and its related activities is a massive burden. Your estimates are reasonably accurate, I would think most firms sit in the 12-20% of gross income as a cost when you add in fees, licences, back office MI collators, compliance consultants, time spent, case checkers and all the other activities. That is a silly amount, which after all is actually paid for by the client.
True Potential Wealth Management	If I am honest I feel that a lot of the barriers are from compliance departments/firms that are scared of FCA and fines and any resulting bad press etc. Whenever I have heard a member of the FCA speak it seems common sense what they say. So how did we get to this point where too many times common sense does not prevail and advisers are scared that what is right now will not be right in 5 years and may result in fines etc been levied.
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	The cost of regulation is the main barrier for firms to deliver advice at a reasonable price.

Respondent	Q16: Do you have any comments on the barriers faced by firms providing advice?
Wishart Wealth Management Ltd	IFA regulatory costs are all out of proportion to the risks posed to the investing and advice seeking general public. Capacity issues - we cannot serve everyone nor do we want or need to. Lack of new adviser talent coming through to meet demand.

Respondent	Q17: What do you understand to be an advice gap?
2plan wealth management Ltd (Chris Smallwood)	Where consumers are unwilling or unable to pay the charges for a professional adviser
Abi Stidworthy	No comment
Active Wealth Ltd	The lower income client can't usually afford advice. They used to be sold policies and commission was paid. It worked.
Advantage IFA Ltd	2 parts- People who want advice but cannot afford to pay a fee for it. + People who need advice but don't realise it.
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	A sector of society unable to access financial services, or unwilling to due to cost or lack of financial awareness/education
Aspire Online	Not enough advisers to go round to all who need one, change from commission to fees and the high cost of being in business as an adviser has caused this "perfect storm"
AXA Wealth	We agree with the definition of the advice gap
Barra Gorman	Those who would pay for advice - but do not understand the value of that advice can give in helping to achieve goals
Berkeley Burke Group (Andrew Emery)	The Citizens Advice Bureau believes that those who occupy the advice gap fall into one or more of four groups. The affordable advice gap affects consumers who are willing to pay for advice but not at current prices. The free advice gap affects people who want advice but who are unable to pay for it. The awareness and referral gap affects people who are not aware that advice exists, or where to get that advice. The preventative advice gap affects those who need financial guidance at key points in their lives, but do not take it because it is not marketed properly, or do not get the required breadth of help they need when they do.Where an individual refuses to pay for advice, on the presumption that they can deal with their own finances, it is a matter of opinion as to whether these people occupy the advice gap, as their non-participation is self-imposed I would define the advice gap as a financial need that cannot be advised upon owing to a barrier existing, but not exclusively as a result of the price of advice or the wealth of the individual, though there are contributory factors.
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	Advice that is wanted by consumers, but not supplied by the industry.
Blue Scapes	No comment
BPH Wealth Management LLP	No comment
Brighton Financial Ltd	Those consumers who need advice but who have barriers to accessing it such as low resources.
Broad Wealth Management Ltd	the lack of financial education that majority of individuals have
Browning Financial Planning Ltd	People with less money to invest not being able to afford financial advice - too expensive - brought on by RDR and the abovementioned FSCS problem.
Caleb Roberts Financial Management Ltd	Those who have a need for advice but cannot access it due to fees being charged. They have either insufficient assets/income. This doesn't help them start off with savings goals.
Caledonian Financial Management Ltd	An advice gap is where a clients want advice and cannot get that advice.
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	A regulated advice gap probably exists for lower wealth value clients that either are unable to afford the advice fees, or could afford the fees but the costs would negate any financial benefit achieved with the advice (eg. Tax saving on small investment portfolios in ISAs etc).
Chattertons	A segment of the consumer base which are currently not receiving advice on an area of their life for which they may benefit from receipt of said advice
Citygate Consulting Limited	People with insufficient income or assets wishing to pay a fee for advice. Because fees are now the absolute be all and end all, which have to be declared at least 3 times in any process, clients are hugely aware of them and will not accept them. Effectively, I do have to charge a client for all of the aborted work I do with other clients, as sadly that is the main method of generating business, offering people come and meet with me at my expense.

Respondent	Q17: What do you understand to be an advice gap?
Close Brothers Asset Management	Response to Q17 to Q21 Close Brothers Asset Management provides a full range of investment management and financial advice services to private clients and professional advisers. In this response we intend to focus on the advice gap. 1. Clearly in addressing the needs of those consumers who fall into the advice gap (these with less than 100,000 investable assets or incomes under 50,000), investor education is crucial. This needs to be jointly embraced by regulators and the industry. The FCAs focus on clearer client communications is an important initiative. It is crucial that advisers and product providers work to produce interesting, jargon free, descriptions of the solutions they can offer consumers. This can also be used to support client experience through a variety of different media e.g. online, by telephone or face to face.2. Another aspect relates to the requirements for providing regulatory advice and the associated costs of doing so. FCA has issued clarification of the regulatory framework in respect of different types of investment sales models in GC14/3. However, there is still a distinction between the regulatory definition of advice and popular perception of advice which can be much wider. Technological advances and the ability to provide tools and guidance online makes the difference more confusing.3. The FCA highlights various streamlined models including focused advice which may be suitable for consumers with relatively simple needs. However, there is a widespread concern that the evidential requirements for providing focused advice remain the same as for providing full face-to-face financial planning. We suggest that further clarification of regulatory expectations could lead to reduced cost and improved accessibility for many consumers currently caught in the advice gap. For example, the regulatory expectations for a KYC/Fact Find are considerable. Our Fact Find for face-to-face advice extends to several pages. This could be substantially reduced for focused advice. For example, there is no need to ask questions about knowledge and experience of investments, simply assume this is limited. Equally FCA has recently commented that overlong suitability reports that play back soft facts are not required. Clarification that a simple one paragraph advice letter is all that is required for focused advice would be extremely useful. 4. It seems that there has been much industry discussion about simplified products but less focus on how to simplify the requirements of regulated advice. In our view there has already been significant simplification of products for this target market. For example through multi-asset class investment products with clear risk levels designed to match consumers??? attitude to risk or through the growth in index and passive instruments. Conversely, the area between face-to-face advice and pure execution-only business remains a confusing picture. We believe consumers will be better protected if they are guided/advised by a regulated firm with an obligation to assess suitability. However, to make this practical and affordable, a more innovative approach to the evidential requirements of addressing suitability would be welcome. For example a clearer statement of FCA???s expectations which should be reflective of the less complex nature of the product and less diverse nature of the client base. There is a concern that presently ???guidance??? is being given through the use of online support without any recourse to compensation if things go wrong. In order to achieve more protection for consumers, regulators and the Financial Ombudsman need to do more to clarify the streamlined options for giving financial advice. If they are perceived as requiring the same standards of documentation as full financial planning, they will not be practical or cost effective.

Respondent	Q17: What do you understand to be an advice gap?
	5. We are supportive of innovative ways to deliver financial advice and guidance including via the telephone and via digital portals. However, with respect to digital portals we would be concerned if the advice gap were significantly addressed by on-line delivery from firms whose only activity was in this area. We would be concerned that the economics of large volume digital advice only work on the assumption that nothing goes wrong. In the situation where some digital advice or guidance was found to be flawed, we would be concerned whether the providers have sufficient human and financial resources to redress the situation in a timely manner for large volumes of consumers. 6. We would support the notion of safe harbours for more simplified advice models provided clear FCA prescriptions were established and followed by regulated firms. We would support the notion of this safe harbour providing protection for the regulated firm from regulatory sanction provided FCA prescriptions were followed because we feel this protection could significantly lower the cost and risk barriers to firms offering services for less affluent consumers. However, we would not be in favour of such safe harbours offering regulated firms protection from litigation by their clients because we feel this could deter some consumers from taking advice. 7. One of the major areas of cost for providers of advice is the cost of acquiring a new client. This cost is in addition to and separate from the cost of actually providing advice. Indeed, advice providers may incur significant costs in acquiring new leads that ultimately fail to turn into clients and therefore fail to generate any revenue at all. We believe that in order to address the advice gap successfully, the FCA needs to recognise the importance of client acquisition costs to advice providers. We believe that the advice gap will only be successfully addressed if those providers with low client acquisition costs (high-street banks, insurance companies etc.) are encouraged and financially motivated to enter the space. Their low client acquisition costs accrue from combinations of brand strength, sheer scale and branch networks. 8. We would also like to comment on the significant contrast between the suitability requirements which apply to designated investments and the regulatory position for some potential alternatives. Peer-to-peer lending is increasingly being put forward as an alternative to some of the simplified investment products and discussions. The risks of peer-to-peer lending are still being understood and the industry in its current size and form has not been tested through the economic cycle. Despite this, the requirements for advising an individual to participate in peer-to-peer lending are less burdensome from a regulatory and evidential perspective than those applying to personal recommendations under COBS (including these applying to investment in UCITS, which were originally designed for the retail market). In contrast to designated investments, savers who invest in peer-to-peer lending do not enjoy the protection of the Financial Services Compensation Scheme.
Combined financial Strategies ltd	It does not concern me. I believe that those that want advice and are willing to pay for it, will find a good adviser. The others who opt out of advice should not be our concern.
Cranbourne Financial LLP	Where individuals are experiencing a change to their financial circumstances that is likely to have significant short and possibly long-term consequences for them and possibly their family, and where they are not seeking professional financial advice in that circumstance.
D Shearer	cost of advice vs funds available from consumers to pay.
Douglas Baillie Ltd	The inability and/or unwillingness of some consumers to pay for essential advice. - particularly 'at-retirement advice, pension consolidation advice, pension switching and pension transfer advice.
Entrust Financial Planners Ltd	Consumers unable or unwilling to access advice at price that they can afford
Essential IFA	The capacity of the advice industry to give advice compared to the supply and demand for advice.
Esteem Money Ltd	Potential clients being unable to pay for professional advice
Financial Foresight (NI) Ltd	Those segments of the public that are no longer and/or not adequately serviced by the adviser population. In addition there is a gap whereby there are products for which suitably qualified advisers are rare.
Forward Plan IFA Ltd	Those who are less affluent think they cannot afford advice and therefore do not seek it
Halebarns Financial Planning Ltd	Too many advisers looking for wealthy clients to the detriment of the majority
Hall Financial Planning LLP	an advice gap is where an individual requires advice that is currently not being met. the individual may not even be aware that this gap exists. the lack of life cover is a classis example.
Highclere Financial Services	There are four; 1. Those consumers that do not appreciate that they need advice 2. Those who wait until it is too late. 3. Those consumers who require advice but cannot afford it 4. Those consumers who are fearful outfacing advice due to a negative view of the industry.
Intelligent Pensions	From our standpoint this is the same as the savings gap, i.e. people not making enough provision for retirement.

Respondent	Q17: What do you understand to be an advice gap?
Investec Wealth & Investment	Our understanding of the advice gap is those individuals or groups of individuals who have become disengaged from the advice as their financial affairs are considered too small to make individual face to face advice viable. By this we mean the minimum cost that an advice business would have to charge for client take on would be disproportionately large considering the size of the individuals affairs. That is not to say these individuals would not benefit from advice but that the advice industry currently cannot demonstrate sufficient value to make this worthwhile. For this reason this class of individual or individuals are disenfranchised in that they will rely on friends and family or the internet to make hopefully informed financial decisions.
Iwan Jones	Should'nt a gap. Everyone should have a fair access to advice
James Hay Partnership (Janet Morville-Smith)	In the retirement space it is those with smaller savings pots not accessing full financial advice. For example, before the introduction of pension freedoms many bought annuities from non-advised annuity desks. The alternative (drawdown) was widely viewed as only appropriate for those with ??200k+. Now, without advice all fund sizes can access drawdown. Whether these clients would seek advice, and pay for it, is unlikely in the current marketplace.
John Lord	No comment
Jonathan Davis Wealth Management LTD	No comment
Joslin Rhodes Lifestyle Financial Planning	N comment
Katy Master	No comment
Lemonade LLP	Where people who would benefit from advice do not have access to it
Lighthouse Financial Advice	where a client should seek advice and does not
Morgan Financial Ltd	For me the gap is the fact that a client may need advice but has been precluded from getting advice by RDR and fees. This is over simplistic. There is a need for pro bono advice (emphasise advice NOT information like CAB delivers) to the poorest. Advice is taking the weight off of the person in need and delivering to them the best outcome.
Morgans Ltd	My understanding of what is meant by the advice gap is that certain segments of the population are less likely to be able to access financial advice. There is no doubt a gap that exists where low income/wealth consumers do not necessarily receive the advice they need. This may sometimes be for products that are not a profitable proposition for regulated advisers. However, there are a number of sources of generic advice available that could help these consumers to understand what they need to do. The issue arises that these sources of advice cannot then act as a product channel. In the early drafts of the RDR consultation there was talk of General Advisers and Professional Planners but this was later dropped. Perhaps there is a case to introduce an advice tier where advisers can advise on and sell mortgages, protection and simple (cost capped) investment and pension products.
Openwork Limited	Either where consumers are unwilling or unable to pay the charges for a professional adviser or where the number looking to be serviced cannot be met by the supply of advisers. The former is definitely a current problem; the latter an emerging one.
Park View FP Ltd	Lack of advice to those who can not afford professional advice
PCM Asset Management Ltd	There is no advice gap. There may be a 'Demand-Gap' in that people are not willing to pay for something they don't understand they need, and are naturally not prepared to explore something in which they see no personal gain or benefit. We have NEVER refused to advise ANY client, due to the barriers of cost......
Penguin	Not enough advisers to support the community that need advice
Polygon Financial Ltd	Cost of advice out of reach of many.
Profile Financial Solutions	Inability of people with lower wealth or income to access regulated advice.
Prosperity Wealth Management Limited	We agree with the review.
Protection & Investment Ltd	The advice gap is both where a known need cannot be met but also where there is no clear need identified due to lack of financial education or access to advice. In our day-to-day meetings with consumers we see many instances of needs which have yet to be identified by the consumers and would perhaps only be identified when pointed out to them.
Richmond House Group	The lack of advisers servicing those with smaller assets and the young in long term savings.
Rob Coote	When RDR was first spoken about it was felt that the lower end advice would be provided by banks and the higher end by financial advisers which left the middle ground unserviced. With the withdrawal of the banks from providing advice that has left a huge number of the population not receiving advice.
Rowley Goodall Ltd	No comment

Respondent	Q17: What do you understand to be an advice gap?
Royal Mail	The Keep Me Posted campaign would agree with the FCAs suggestion that the advice gap be regarded as any situation where consumers cannot get the form of advice that they want on a need they have, at a price they are prepared to pay. The campaign would also agree that the advice gap can include areas where consumer demand is low because the long-term benefits of advice may not be fully appreciated.
Simplified Money Ltd	Where we cannot offer a service because people are either unable to pay for it; do not see the price as value for money; or because taking their business on would be loss making/unprofitable.
SK Financial	I think there is an educational gap
South West Financial Planning	As in the definition. Unable to engage in advice channels due to the consumers ability to pay or want to pay.
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	Wealth restriction for those on perceived low incomes or with assets below a given level
Dean Robertson	no comment
Sussex Independent Financial Advisers Ltd	No comment
Swallow Financial Management LLP	The population of the UKs Lack of savings lack of retirement savings lack of regular pension savings lack of regular savings insufficient protection (income/life/etc) due to either an inertia on their part to save/invest or access to qualified advice to promote savings in all the areas or provide protection for the family
Taurus Global Financial Advisers Ltd	Those clients who can't afford to pay the minimum fees for advice.
The Minster Partnership llp	sections of the community who are not aware of IFA services and the value they bring
Tom Orchard (Annetts & Orchard)	The advice gap has two elements. The first one is the most obvious, the gap between the public wanting advice and not being able to get it, either selected against because of their wealth, or because of their ability to pay a fee. The second is much harder to quantify and arguably much more of a problem. That is the gap where consumers dont even understand they need advice, or even worse, simply dont care they do. These will all become issues for the whole of society and local communities to deal with at some stage in the future. Already too many think its not worth saving etc as other people dont bother and the state wont let you starve. That is an aspiration failing in the education of society as a whole. Too many now think they have their rights which of course the state cannot afford to provide and feel no responsibility to their communities. This is a massive problem and needs to be rectified at grass roots levels.
True Potential Wealth Management	I feel that the advice gap exists generally on lower income and lower investment opportunities due to costs.
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	Fewer advisers delivering advice to the public at a price they perceive to be of value & worth paying
Wishart Wealth Management Ltd	Consumers who need and could benefit from quality money advice but there is no one willing to serve them as, to serve them is not economically viable (especially when there are already more than enough HNW clients with the capacity to pay fees from their business, personally or from their assets. The advice gap already existed but was accelerated by the RDR.

Respondent	Q18: To what extent does a lack of demand for advice reflect an advice gap?
2plan wealth management Ltd (Chris Smallwood)	We dont believe there is a lack of demand, the advice gap is caused by the unwillingness or inability to pay the charges for a professional adviser, which are simply a reflection of the costs to serve as there is no evidence that any advisory business is making sustainable profits currently
Abi Stidworthy	No comment
Active Wealth Ltd	No demand from lower income clients
Advantage IFA Ltd	That many people know they can't afford it and don't bother to look for it.
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	No comment
Aspire Online	I don't believe it's a lack of demand for an established adviser, it's a lack of time and resource, too many regulatory demands on an advisers time. (even this report Im doing on a Sunday afternoon-and more than 1 weekend afternoon)
AXA Wealth	There may well be a lack of demand for advice in certain consumers segments but that doesnt mean to say that they dont have a need for advice or would take and pay for advice if it were offered. Demand is driven by knowledge that a service exists and a perception of value to the consumer. If they dont know about it or indeed value it they wont demand it. This is where the role an adviser is critical, to inform, persuade and sell the value and therefore create the demand.
Barra Gorman	na
Berkeley Burke Group (Andrew Emery)	Why is there a lack of demand despite there being need? Complexity of financial services Provision is inefficient Trust due to miss-selling and inability to delineate from bank provision and private IFA Cost of advice (not from commission) out of clients own pocket, and client time cost Clients dont necessarily know that they need advice, when they need advice and why (what constitutes a good outcome, can a client quantify this?) Inability owing to vulnerability and disability Lack ability to access technology solutions DIY culture, why pay when can do themselves (self-confidence) In summary, the perceived lack of demand (the advice gap) is an artificial position that will need to be addressed at some future time when problems arise - most probably when people have little or no savings left and require funding from the State for most of life's essentials.
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	No comment
Blue Scapes	No comment
BPH Wealth Management LLP	No comment
Brighton Financial Ltd	Surely if there is a lack of demand, it could be argued that there is not an advice gap. Our view would be that the reason there is an advice gap is because there is a demand for advice?
Broad Wealth Management Ltd	No comment
Browning Financial Planning Ltd	The demand is greater than ever - but pensions for example have become so complex and litigious that many advisers will stay clear.
Caleb Roberts Financial Management Ltd	That people believe they can't afford the cost.
Caledonian Financial Management Ltd	A lack of demand would suggest to me there is no advice gap. If people were queuing around the block waiting to see advisers and were unable to get an adviser then I would consider there to be an advice gap.
Carolyn Callanan	No comment

Respondent	Q18: To what extent does a lack of demand for advice reflect an advice gap?
Chartered Financial Management (UK) Ltd	The lack of demand does not in itself represent the advice gap because higher wealth value people who may be able to afford regulated advice are able to seek guidance elsewhere or online and make their own decisions. In these circumstances, there is no gap but simply a reduced demand for the services, which is probably driven by increased self-confidence and availability of generic information.
Chattertons	An advice gap is caused by a lack of demand. That demand can be because people don't know what the benefit of advice would be as well as because people actively choose to DIY.
Citygate Consulting Limited	I have always thought that advice is something that people need, but don't necessarily want. There is a key distinction. The key when things were "advised" with a commission paid was that I could convert those that didn't think they wanted it to actually realising they needed it and now wanted it. The "want" is hugely affected by a fee. Clients I dealt with NEVER had and issue with a commission.
Close Brothers Asset Management	same as Q17
Combined financial Strategies ltd	N comment
Cranbourne Financial LLP	To the extent that many consumers cannot recognise the circumstances in which they need financial advice. Also there is little engagement by many with advisers and a lack of understanding of the benefits as well as the cost of advice.
D Shearer	A lot? Except that lack of knowledge that people NEED advice is significant
Dean Robertson	no comment
Douglas Baillie Ltd	It doesn't: there are millions of people who want and need advice
Entrust Financial Planners Ltd	No comment
Essential IFA	Although there may be an underlying demand for advice, it is often restricted by the capacity of individuals to pay for it. The cost of advice can and does act as a barrier to consumers. A way of possibly getting around this problem is to reintroduce a limited form of commission. This could take the form of an insurance company or platform provider paying a two year indemnified fee to an adviser practice for regular savers advice for example.
Esteem Money Ltd	Ignorance is the main factor, many potential clients do not know they need advice, and much better they would be through receiving help.
Financial Foresight (NI) Ltd	The lack of demand is only a function of the reducing margins not attracting new advisers/propositions.
Forward Plan IFA Ltd	There is a demand, it is the perception that advice used to be free and is now expensive that has created the gap
Halebarns Financial Planning Ltd	lack of demand suggests consumers don't trust advisers and they think charges are too high.
Hall Financial Planning LLP	No comment
Highclere Financial Services	There is no lack of demand. many advisers actively seek business by cross-selling to their clients and by receiving referrals.
Intelligent Pensions	I think that the lack of demand for advice is due to the cost (or perceived cost) of taking advice. The reality is that people need to be motivated to save, and education alone is insufficient. To motivate them, there needs to be a motivator i.e. a salesmen, who in turn needs to be incentivised. I do think there is scope to develop this through contingent fees financed through savings products, while avoiding the problems of the old commission based system.
Investec Wealth & Investment	People often dont know that they need advice when they need it. Also there will be the perceptions and barriers previously mentioned that will deter people who would ordinarily ask for advice.
Iwan Jones	Make everyone aware they can get free advice
James Hay Partnership (Janet Morville-Smith)	The perceived lack of value of advice is a key driver for lack of engagement. The further professionalism of the advice market will also drive up its perceived high costs, and as a result exclude even more from accessing advice.
John Lord	No comment
Jonathan Davis Wealth Management LTD	No comment
Joslin Rhodes Lifestyle Financial Planning	No comment
Katy Master	No comment
Lemonade LLP	There is an advice gap when lack of financial knowledge means an individual is unaware of the benefits of financial advice in a particular area.
Lighthouse Financial Advice	to a degree, a lack of education on the consumer will always lead them to not understand they have a demand.

Respondent	Q18: To what extent does a lack of demand for advice reflect an advice gap?
Morgan Financial Ltd	I think there is huge demand for advice. People want it and rather than there being a lack of demand people are being led along the lines that they can get advice from free if they can avoid buying a new product.
Morgans Ltd	A lack of income and investable assets is clearly a factor for many consumers. We need to create an interest in people planning their finances so they can take steps towards a more secure financial future. This needs to be a service free at point of delivery. MAS working correctly can generate demand.
Openwork Limited	We dont believe there is a lack of demand. The advice gap is caused by the unwillingness or inability to pay the charges for a professional adviser, which are simply a reflection of the costs to serve, as there is no evidence that any advisory business is currently making abnormal profits.
Park View FP Ltd	I am not sure on this issue as we are in huge demand from HMW consumers but not from lower income consumers
PCM Asset Management Ltd	see Q17.
Penguin	i dont believe there is a lack of demand, people just dont know what a good financial adviser/planner can do for them - whether it be advice on debt management to free up income, saving some income tax via tweaks to their position, plugging protection gaps or reviewing legacy products - there are not enough bodies/firms/institutes telling positive stories about how advice can help pretty much anyone
Polygon Financial Ltd	Shows lack of understanding by retail clients of the benefits of advice.
Profile Financial Solutions	No comment
Prosperity Wealth Management Limited	No comment
Protection & Investment Ltd	No comment
Richmond House Group	There is no lack of demand for advice firms, there are sufficient wealthier individuals who need advice. Advisers are an ageing breed and we need to encourage younger people to come into the profession. The barriers to entry detailed in Q16 must be removed if we are to make this an attractive career path.
Rob Coote	A lot coupled with consumers not being willing to pay for advice.
Rowley Goodall Ltd	No comment
Royal Mail	This is not a topic on which the Keep Me Posted campaign is able to provide a response.
Simplified Money Ltd	There are definitely a number of people in the advice gap as quantified by various analysts that will never seek advice. However, there are also a number in there who don???t think they want advice yet would seek it IF it were more accessible and/or some of the reasons for distrust could be removed. I could not quantify here how many of the 5.5million identified by Deloitte are in the above two segments but we have made some assumptions for our business based on McKinsey???s prediction that 30% of the advice gap would seek advice is we were able to accomplish the latter.
SK Financial	I don't believe it is. RDR was a great thing for our industry the first time that consumers and intermediaries could work in partnership with each other. The poor way this was and has been communicated to the general public is "you can't charge me commission anymore". We need to educate the consumers on the benefits of advice and the fees involved as they are not used to, in the main, paying for this.
South West Financial Planning	I personally do not have a lack of demand.
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	Only in the mind of those driven by case size
Sussex Independent Financial Advisers Ltd	No comment

Respondent	Q18: To what extent does a lack of demand for advice reflect an advice gap?
Swallow Financial Management LLP	There appears to be no lack of demand for advice by clients who are aware of the need for advice, it is the failure to be prompted to the need for advice by a vast reduction in advisers over the past 5/7 years. The need for advice is only relevant to the client when it is required, here today! NOW The institutions are fearful to provide policy information as it may be construed as advice by the client so they just recommend take independent financial advice! The client could conceivably contact the IFA firm for information but as its not cost effective then turn the client away so their experience of the financial industry is soured due to the fear of 1/ providing/interpreting it as advice and 2/ not having the ability or it not being cost effective to the advice firm. Because of this the client would not seek advice again! (I certainly would not)
Taurus Global Financial Advisers Ltd	It doesn't.
The Minster Partnership llp	Most people have a demand - they just don't know it
Tom Orchard (Annetts & Orchard)	I think that it is very hard to quantify the lack of demand, for the same points mentioned above. A generational failure to educate schoolchildren has been a missed opportunity, and is still occurring today. A whole generation has been lost to namby-pamby politics and had excuses made for them to compound this issue. (Do consumers understand the real cost of getting the latest mobile phone on contract at every new release Is that not a loan from the phone providers Should they not be made to separate the cost of buying the phone from the contract for example Do they understand the effect of the compound interest lost on buying a fancy coffee every day on the way to the office for 3 or so) Because they have a student loan, they have a purpose built excuse to not have any spare money, whilst in actual fact, most will spend more on any of a mobile phone contract, a combination TV package, posh coffees or a single console game per month than they do repaying their student loan. (25,000 earnings is a repayment of just 30 per month, large Starbucks Latte 2.60, IPhone 6 contract on Vodafone for 24 months, 39 per month, PS4 Call of Duty from Game, 43, interest on a 100 Wonga loan for 30 days, 24). Poor education is responsible for the lack of demand for advice.
True Potential Wealth Management	People think it is too expensive for advice, when I first started to do advice with Abbey National you would sit down with anyone and complete the 25 per month pep or 5 per month life cover now the banks do not offer this and its too expensive to give the advice for such clients to receive from an adviser.
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	I don't know that there is a lack of demand for advice - it is more a lack of willingness to pay the current price for it
Wishart Wealth Management Ltd	Not at all. Our firm receives enquiries from consumers with smaller sums and income but we have deliberately set our service up not to serve them. We turn these enquiries away. We are asked 'where can we go for advice now- but we have no answers to that.

Respondent	Q19: Where do you consider there to be advice gaps?
2plan wealth management Ltd (Chris Smallwood)	The first few categories Starting Out, Living for Now, Hard Pressed are the least well served by the current market as they struggle to access professional financial advice post RDR due to the higher entry costs of advice. New solutions that involve simplified models need to be targeted at these segments, simplified models need to be aligned to lower levels of advice risk for the supplier too ??? e.g. safe harbour type products but allied to FOS exclusion
Abi Stidworthy	No comment
Active Wealth Ltd	Lower income families
Advantage IFA Ltd	In all areas.
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	Living for now Striving and supporting Starting out Hard pressed Busy achievers
Aspire Online	See attachments
AXA Wealth	From a practical and commercial perspective authorised firms are predominantly interested in consumer categories from Stretched & Resourceful upwards as prospective customers must have investable funds to advise on and if a personal recommendation the funds to pay for it. In the market that AXA Wealth operates it believes that an advice gap is apparent for those consumers who: Have lower levels of investable assets or income. Lack the knowledge & experience to self-direct. Lack the knowledge & experience to appreciate the value of advice. Are not willing to pay for advice, or the cost of advice currently would be disproportionate to the value of the investment AXA Wealth believes that an advice gap can exist when significant wealth or complexity occurs, when, for example, where the consumer doesnt appreciate the value of advice. Historically AXA Wealth provided a personal recommendation to consumers through its advisers based in Banks & Building Societies. Its for this category of consumers where the advice gap is most acute. Consumers currently in the categories below Stretched & Resourceful arent likely to need the services of the regulated firms like AXA Wealth. Therefore AXA Wealth believes that these consumers are best served by non regulated firms and public service bodies.
Barra Gorman	No comment
Berkeley Burke Group (Andrew Emery)	Absolutely everywhere in the financial services spectrum with the possible exception of the true Higher Net Worth (HNW) individuals. With the mechanism for a "painless" payment option now removed (commission) what did the Regulator and/or Government expect to happen
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	No comment
Blue Scapes	No comment
BPH Wealth Management LLP	No comment
Brighton Financial Ltd	In relatively complex areas of financial planning where fund sizes or budget result in an inability to cover the fees for professional advice.
Broad Wealth Management Ltd	All areas of financial planning
Browning Financial Planning Ltd	The demand is greater than ever - but pensions for example have become so complex and litigious that many advisers will stay clear.
Caleb Roberts Financial Management Ltd	Some of the groups in the consumer spotlight
Caledonian Financial Management Ltd	the only gap I can see in relation to an advice gap it for clients who want to access their pension freedoms and are unable to get an adviser to transact the business for them, where providers won't process a transfer unless the client has been advised. Where does the client turn?

Respondent	Q19: Where do you consider there to be advice gaps?
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	Agree with FAMR CfI Oct 2015 document
Chattertons	I think the CAB sums it up well with their 'four advice gaps'
Citygate Consulting Limited	those accumulating wealth and earning less than 100k and under the age of 40. That said, they can always go to SJP who are still paid via commission. So as long as they have their own rules, the advice gap isn't quite as bad as it would be, but then you could argue the advice gap is still present, as the "advisers" there may not actually sell the right products, as they don't have everything available (structured products, guarantees, trail on all investments etc)
Close Brothers Asset Management	same as Q17
Combined financial Strategies ltd	No comment
Cranbourne Financial LLP	At retirement and in the 10 years up to that point. When taking on a mortgage on own home, and probably on BTL. Among 25-45 age group, at key points such as marriage,birth of children, buying a home
D Shearer	No comment
Dean Robertson	no comment
Douglas Baillie Ltd	Pensions: Particularly 'at-retirement' and 'pension freedoms'.
Entrust Financial Planners Ltd	Everyone connected with retirement planning and pensions. The guidance isn't proving to be very successful with 4.7bn taken out of pensions since April. Try giving consumers a voucher for say 500 to access some initial advice from a professional. They would benefit from the expertise and this may well encourage more people to use a professional adviser once they have seen the benefits at first hand. A good proportion of advisers would take part in this scheme. I also believe that many advisers will stand back and keep well away from the undoubted fall out that will emerge as they feel that they have been abandoned by successive governments and are powerless to object to what many deem excessive regulation. It is their small way of making a stand.
Essential IFA	I consider the following categories of advice to be part of the advice gap: Debt Mitigation Advice Pension Accumulation Advice Pension Crystallisation Advice General Savings Advice Protection Advice Long Term Care Advice Estate Planning Advice
Esteem Money Ltd	This are gaps across all groups
Financial Foresight (NI) Ltd	Under 35's
Forward Plan IFA Ltd	For those with household incomes of below 50,000 and perhaps savings of under 50,000
Halebarns Financial Planning Ltd	Lower paid element of the population
Hall Financial Planning LLP	Amongst those younger than 45 and older clients who have little in terms of investible assets but still require advice.
Highclere Financial Services	Everywhere. The population is under-insured against death, under-insured against the impact of long-term ill-health, under-saved, under-pensioned, over-reliant on the State to bail them out.
Intelligent Pensions	Virtually everyone in a DC pension scheme with earnings above a certain level this being related to the level of their prospective state pension entitlement.

Respondent	Q19: Where do you consider there to be advice gaps?
Investec Wealth & Investment	Starting out ?Saving into a pension Taking out credit and managing debt Getting life assurance and protection cover 2. Living for now Saving into a pension Saving for short term needs Taking out credit and managing debt Investing 3. Hard pressed Saving into a pension Investing Getting life assurance and protection cover 4. Busy achievers Saving into a pension Saving for short term needs Taking out credit and managing debt Investing Getting life assurance and protection cover 5. Affluent and ambitious Saving into a pension 6. Retired on a budget Taking an income in retirement (including through equity release) Investing
Iwan Jones	In all sectors
James Hay Partnership (Janet Morville-Smith)	Small pot retirement planning
John Lord	No comment
Jonathan Davis Wealth Management LTD	wealth management
Joslin Rhodes Lifestyle Financial Planning	No comment
Katy Master	No comment
Lemonade LLP	We consider the advice gaps to be: - Taking an income in retirement - Saving into a pension - Getting life insurance & protection cover These exist across all relevant sectors.
Lighthouse Financial Advice	Advice gaps is mainly when someone seeks advice and then is rejected or priced out of the market. for example a client with a modest 20,30,000 suitable to invest, needs advice where to put it but the 1,500 charged is too costly as a percentage. Or someone with a savings need for pension or just to boost their future assets want to save 50-10 per month and again get charged 1,500. Too much for the benefit it brings
Morgan Financial Ltd	The very poor, and low income families. People with a 'good' income with limited surplus income cannot afford an invoiced fee. Somehow advice needs to be more cost effective to give one off advice for just a few pounds. It has been said independently that a client needs to produce 750 - 850 in fees to be viable for an adviser to sit down with given all the costs advisers face. How we fix this is the challenge.
Morgans Ltd	Lower income and wealth and low financial capability groups would benefit from advice but delivering this economically is the problem.

Respondent	Q19: Where do you consider there to be advice gaps?
Openwork Limited	The first few categories (Starting Out, Living for Now, Hard Pressed) are the least well served by the current market as they struggle to access professional financial advice post RDR due to the higher entry costs of advice. New solutions that involve simplified models need to be targeted at these segments, simplified models need to be aligned to lower levels of advice risk for the supplier too e.g. safe harbour type products that genuinely mitigate against speculative future redress claims whilst continuing to meet TCF principles.
Park View FP Ltd	as above
PCM Asset Management Ltd	See Q17
Penguin	everywhere - MAS and CAB arent funded or qualified enough and there is no incentive for advisers to serve the various markets.
Polygon Financial Ltd	Less affluent proortion of population and know it alls.
Profile Financial Solutions	No comment
Prosperity Wealth Management Limited	Pension freedoms for clients with less than 200,000 in their pension funds. Also where people are now approaching retirement never having used financial advice before. We also see an increasing number of 25 - 35 year olds believing that they are able to self advise using information gleaned from the internet rather than seeking professional advice. financial advice does not rank highly on their priority list
Protection & Investment Ltd	Basic financial requirements e.g. emergency fund, debt advice, savings. Auto-enrolment ensuring people save for retirement is laudable but there is almost no advice being provided on how to meet retirement goals, how much is enough, how should contributions be invested, should people consolidate small pots.Protection there continues to be a significant protection gap, even in basic areas such as life cover to protect the mortgage. People are generally unaware what they need to protect and how to do it effectively, let alone aspects such as having policies in trust. Pension freedoms lots of people are seeking advice but based on the numbers provided by FCA and ABI, a significant number of consumers are taking complex decision which will affect the rest of their lives without taking any advice or seeking guidance (see low take up of Pension Wise and CAB). Lower earnings, consumers with lower assets, those starting out.
Richmond House Group	Those consumers with minimal assets and the young.
Rob Coote	Low to middle income
Rowley Goodall Ltd	No comment
Royal Mail	As previously suggested in this response, the Keep Me Posted campaign also believes that a particular gap exists in the advice available to those with limited access to digital platforms (reflecting a wider gap in these groups??? access to financial services as a whole). In light of this, we would recommend that the FCA give consideration to the medium through which advice on financial services is provided to the various consumer segments it has already identified as part of this review
Simplified Money Ltd	Biggest issue is At retirement, partly because everyone is learning about Pensions Freedom and partly because many smaller pension fund holders simply cant/wont afford the post RDR fees
SK Financial	For those that understand the value of financial advice and are prepared to pay for it
South West Financial Planning	Starting out for modest investment levels.
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	The whole industry
Sussex Independent Financial Advisers Ltd	No comment
Swallow Financial Management LLP	Retirement savings regular savings life protection income protection and more

Respondent	Q19: Where do you consider there to be advice gaps?
Taurus Global Financial Advisers Ltd	Those clients with small pensions and investments under 30,000.
The Minster Partnership llp	Lesser educated and financially unaware public
Tom Orchard (Annetts & Orchard)	Agree with your thoughts on non in deposit / short term savings market. Also I believe no gap in a mostly price sensitive GI marketplace either. Loans I think are also served best by banking but I think that regulations should be in place to delay the access to pay day loans, either cooling off periods, only able to apply within normal working hours 9-5, need for a signature on a document (so postal delay) or some other method. A decision to borrow a few hundred pounds from a modern day licensed loan shark can have massive implications on an individual or a familys ability to save for the future. For the rest of the market place and your examples in the grid used, allow regulated professional advisers to do the job in filling that gap, with suitable regulation and tools, and the right numbers of advisers.
True Potential Wealth Management	as previous lower amounts and people with savings in banks that don't have advisers within the banks to see and for some reason feel that there is no other option.
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	There are insufficient advisers / advice channels prepared to deliver advice & solutions to lower net-worth individuals at a price deemed to be profitable This typically encompasses regular savings & protection needs
Wishart Wealth Management Ltd	At retirement When taking on debt On death On ill health On setting up a new business or going self employed On changing job - as a demographic anyone earning under 50k per annum or with investable assets much under 100k could struggle to find a top end adviser willing to help them (as clients with much more income and assets are freely available, value us and more profitable to deal with).

Respondent	Q20: Do you have any evidence to support the existence of these gaps?
2plan wealth management Ltd (Chris Smallwood)	n/a
Abi Stidworthy	No comment
Active Wealth Ltd	Yes
Advantage IFA Ltd	You will never find any hard evidence, it is always going to be impossible to capture. However I know that many of my friends would not approach a financial adviser as they don't feel they could afford it.
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	Our client based demographic is primarily (90%) over 60 investment clients ??(i.e. Retired with resources)
Aspire Online	not that I can prove
AXA Wealth	During 2014 AXA Wealth undertook a past business review of the personal recommendations provided by its Bancassurance sales force. During the course of the review we kept records of the type of complaints raised by consumers. Interestingly the 3rd largest cohort was not linked to the personal recommendation but the commercial decision to withdraw the advice service.
Barra Gorman	No comment
Berkeley Burke Group (Andrew Emery)	It is probably only anecdotal at the moment as the true effects of RDR are only just beginning to show any patterns.
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	No comment
Blue Scapes	No comment
BPH Wealth Management LLP	No comment
Brighton Financial Ltd	Some consumers have contacted us to access their relatively modest pension funds. When we have explained our advice process and our fees they have said that they are either unwilling to pay for the advice or that the cost of the advice is not warranted.
Broad Wealth Management Ltd	No comment
Browning Financial Planning Ltd	Open your eyes, its all around you.
Caleb Roberts Financial Management Ltd	Have often turned people away who want to make regular monthly savings into an ISA as they have nothing else and can't afford the fee.
Caledonian Financial Management Ltd	No
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	As a firm, we offer regulated advice services for a set minimum initial advice fee, which would ultimately be too expensive for lower wealth value individuals. These individuals will need to seek another firm to deal with or look to use guidance material elsewhere
Chattertons	https://www.citizensadvice.org.uk/the-four-advice-gaps/
Citygate Consulting Limited	I have met people that would have invested money etc, had they not had the psychological impact of having less than 100% of their money invested. OR indeed, where the regular premium they have available is insufficient to warrant my time in setting things up, yet the client wants a FULL service.
Close Brothers Asset Management	same as Q17
Combined financial Strategies ltd	No comment
Cranbourne Financial LLP	No but it's anecdotal from who approaches us and who values advice
D Shearer	No comment
Dean Robertson	no comment
Douglas Baillie Ltd	Lots and lots that are far beyond the scope of this review and this questionnaire!
Entrust Financial Planners Ltd	Yes, prospective clients who come to see me needing my help for retirement planning, but stating that they cannot afford my fees.
Essential IFA	I have been a financial adviser for the last 21years and running my IFA practice since 2007 and in my professional opinion, there is a considerable lack of knowledge within the general public of the above areas.

Respondent	Q20: Do you have any evidence to support the existence of these gaps?
Esteem Money Ltd	The significant encashment of pensions since Pensions Freedomwere introduced, without any reference to guidance or advice, suggests that many were quite happy to make mistakes, pay too much tax, and deprive their families of improved death benefits, rather than take advice.
Financial Foresight (NI) Ltd	Only the low incidence of new clients under 35.
Forward Plan IFA Ltd	when discussing services with potential clients, those with these levels of income/savings tend to initially baulk at charges
Halebarns Financial Planning Ltd	I know of companies that will not look at individuals with less than 50,000 to invst
Hall Financial Planning LLP	individuals do contact me requesting advice but do not proceed due to the level of fees involved.
Highclere Financial Services	My own client bank suffers many of these failings despite my best attempt to resolve them. Numerous surveys point out the protection gap (Swiss Re Annual Report), the pension gaps, etc
Intelligent Pensions	We do provide consultancy work for some DC schemes and it is evident from our experience that there is a significant lethargy among members whose attitudes tend to be to put things off another year, and another year and so on.
Investec Wealth & Investment	No comment
Iwan Jones	Yes
James Hay Partnership (Janet Morville-Smith)	The non-advised annuity desk business figures and non open market option annuity purchases. This has been followed with pension freedoms and the rising number of fully encashed funds.
John Lord	No comment
Jonathan Davis Wealth Management LTD	if there weren;t there would be less Buy To Let debt/investing
Joslin Rhodes Lifestyle Financial Planning	No comment
Katy Master	No comment
Lemonade LLP	These views are based on our observations working with less affluent individuals.
Lighthouse Financial Advice	Yes people turn me down and I turn them down as its just too costly against the benefit they could gain.
Morgan Financial Ltd	Yes I turn people away who want to talk about their public sector pension. They cannot and will not pay. As an aside people are not taking their positions seriously. Employed people will in general not take time off work to meet with an adviser. We will not work at 8:30 in the evening now for free at a time convenient for a couple with children.
Morgans Ltd	see earlier
Openwork Limited	Not statistically, but with most advisers having segmented their client base to serve more profitable customers, it is self evident that tranches of lower net worth individuals will be left behind under the current regime.
Park View FP Ltd	Not fully researched studies just a general view on the world and the fact we see very very few people on low incomes even seeking advice
PCM Asset Management Ltd	No,- like everyone else, it can only be a perception. If I saw a sworn consumer survey, that proved, that hundreds of people had been 'turned-away' from IFA's due to having insufficient investable funds, I might begin to believe there is an advice gap. In the meantime though, consumer surveys asking would they use an IFA etc, mean nothing to me.
Penguin	Yes - the market research we have done over the last 2 years in setting up our phone and online business Get Financial Advice suggest there is a massive need for advice in certain product areas from setting up a business and getting funding, to advice on pension options and reviewing old products. We have invested a lot of money to get the business in a position where it can hopefully start to deliver on its objectives but we have learnt a lot about the "gaps" during that time
Polygon Financial Ltd	Only for the very few people we have turned away over the years, and those refusing to pay for ongoing reviews.
Profile Financial Solutions	Look for an adviser on www.vouchedfor.co.uk and note the lack of professionals willing to advise on less than 100k.

Respondent	Q20: Do you have any evidence to support the existence of these gaps?
Prosperity Wealth Management Limited	we have spoken with a number of our son's friends to try and understand the resistance to proper financial planning we have also received a number of introductions to the parents of younger friends where pensions guidance is being sought
Protection & Investment Ltd	No comment
Richmond House Group	It is now well documented and borne out by the business models of all the firms I meet.
Rob Coote	No
Rowley Goodall Ltd	No comment
Royal Mail	Despite the important nature of transactional mail, there remain long-term implications for taking away the options of printed communications that can have the impact of marginalising those consumers not able to access financial advice through digital platforms. Research conducted by the Opinium polling firm on behalf of the Keep Me Posted campaign found that costs vary across the board, and it is very common for service providers to charge additional costs to provide duplicate statements, and that some providers only give access to a limited number of historical statements. The Keep Me Posted campaign believes that it is every consumers right to choose how they are contacted by banks, utility companies and other service providers. However, some companies demonstrate a clear preference for the digital medium and are effectively exercising a prejudicial attitude to those who choose paper.
Simplified Money Ltd	Biggest issue is At retirement, partly because everyone is learning about Pensions Freedom and partly because many smaller pension fund holders simply cant/wont afford the post RDR fees
SK Financial	Yes. I do a lot of talks in schools and there is a lack of financial awareness. From a work viewpoint clients only come to me really because they need advice. People have similar needs but don't often do much about it. Why do you think we have a savings crisis?
South West Financial Planning	No, just anecdotal
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	no comment
Sussex Independent Financial Advisers Ltd	No comment
Swallow Financial Management LLP	Our client files and new clients whom we take on board
Taurus Global Financial Advisers Ltd	In the current financial press daily.
The Minster Partnership llp	No
Tom Orchard (Annetts & Orchard)	Although you have excluded the savings gap from this review, it is evidence of the advice gap. Nature abhors a vacuum and the lack of the old financial services industry salesman has led to the space being filled with online casinos, betting shops and pay day loan providers. Any look at the Times Rich List gives us all the evidence we need to say which elements of dealing with money are making the most profit. (As does as a quick glance at premier league football shirt sponsors.) Consumers need to be inspired to visit regulated financial advisers to get them saving, once they see compound interest working in their favour and start working towards a goal no matter how humble, they will think twice on frittering cash on the things they have defaulted towards today.

Respondent	Q20: Do you have any evidence to support the existence of these gaps?
True Potential Wealth Management	No comment
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	Typically these needs would have been serviced by advisers in branches of banks & building societies as well as home-service advisers. These channels are no more
Wishart Wealth Management Ltd	Yes - we see people with inadequate savings, pensions and protection all the time running huge financial risks if they die or their health fails. Old fashioned direct saleforces used to address this gap (especially for lower income families) but that form of distribution is largely extinct now. Protection insurance is usually sold not bought so D2C no help.

Respondent	Q21: Which advice gaps are most important for the Review to address?
2plan wealth management Ltd (Chris Smallwood)	Those referenced in Q19 are the most concerning
Abi Stidworthy	No comment
Active Wealth Ltd	All UK citizens should have access to free advice somewhere.
Advantage IFA Ltd	Anything to do with debt management and the avoidance of debt for those with limited financial means.
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	. The consumer education gap 2. The savings gap 3. The retirement income gap In conjunction with education you need advisers who are able to deliver a mass market solution that they get adequately rewarded for, are not bogged down with compliance, and can respond to quickly.
Aspire Online	starting out, living for now, hard pressed and retired on a budget especially when it comes to pension advise and the potential damage stripping out their whole pension pot or just drawing too much annually
AXA Wealth	We would support the review focusing on advice gaps relating to long term savings, saving for retirement and the provision of an income in retirement.
Barra Gorman	Gap in trust and perception
Berkeley Burke Group (Andrew Emery)	Insistent Clients, the Financial Ombudsman Service, following the introduction of pension flexibilities, has received over 600 complaints from customers who have been unable to find an adviser willing to facilitate a pension transfer. Advisers are reluctant to comply with the requests of Insistent Clients through a, fear of redress on a subsequent client complaint and b, an aversion to signing-off a transaction that the adviser knows is not in the clients interest, irrespective of future regulatory reprisals. As such many such clients then execute on an execution only basis, and the advisers should then document that they have offered advice and that this advice has been ignored, but the client has proceeded against the recommendation. A further deterrent to advisers is that many of the pension pots being accessed flexibly, by insistent clients, are smaller pots. Hence, if a client subsequently complains some years down the line, the adviser may very well suffer a higher cost defending the complaint than would have been earned for providing the initial advice. This very dilemma of balancing potential liability against the remuneration received for providing advice is a significant reason why advisers seek to advice wealthier clients, and at a higher cost than is unaffordable to the mass market.However, there exists a moral dilemma, this being the increased threat posed by Pension Liberation scams, which Insistent Clients are particularly susceptible to. Should the FCA and FOS permit advisers to take responsibility for Insistent Client transactions, with impunity to regulatory comeback, the client may arguably become exposed to a less than optimal client outcome, but this would be preferable to them losing their pension to a pension liberation scam, which presumes good adviser due diligence. Furthermore, it may be argued that Insistent Clients, in light of pension freedoms, should be permitted to access their pensions flexibly, and to a certain degree do so on a transactional self-determined basis, that is to say that an adviser is instructed by the client to transact. In this scenario though the adviser should not suffer regulatory comeback, where conversations between the client and adviser are properly documented.The dilemma is that Insistent Clients do not form part of the official Conduct of Business rule book but always acting in the best interests of the client is. As such provision should be made for advisers to deal with Insistent Client requests with impunity to regulatory comeback or client complaint, subject to adherence to agreed guidelines. An alternative is that such transactions fall within a Safe harbour, which shall be discussed below, or that advisers ask clients to sign disclaimers of liability that indemnify them against any future comeback.In summary the issue may not be one of the "type of product or advice", it is one of attitude from the consumer. They believe that they are almost immune from harm as they will always have an avenue of redress against the advisory community. Without the consumer being forced to accept responsibility for their own decisions (decisions that are sometimes made out of greed) it is likely to be almost impossible to bridge any advice gap - perceived or otherwise.
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	No comment
Blue Scapes	No comment
BPH Wealth Management LLP	Savings & pension planning
Brighton Financial Ltd	At the moment, in our view, those looking to secure pension benefits at retirement.

Respondent	Q21: Which advice gaps are most important for the Review to address?
Broad Wealth Management Ltd	Retirement Planning Protection Planning
Browning Financial Planning Ltd	no comment
Caleb Roberts Financial Management Ltd	Busy achievers, stretched but resourceful, starting out. They would be best served by the option for a commission rather than a fee.
Caledonian Financial Management Ltd	
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	Taking income in retirement; taking out credit and managing debt.
Chattertons	Those that believe they are willing to??pay but not at current prices: They simply under-represent the value added by an IFA and therefore do not pay. Again, if advice was split into advice -which is independent and brokerage which is basic then those people would have a choice. Offering free advice would be difficult in the current climate of austerity, however most IFAs offer an hour free anyway; again - marketing. The CAB reckon that these two focuses would have helped 19.9m people over the last two years - almost one in three people.
Citygate Consulting Limited	Wealth accumulation and regular savings. There is a huge gap in insurance in terms of how much people have and how much they should have, but so long as that remains a commission based product we can continue to battle. I can't ever imagine selling insurance to someone by charging them a fee for my time.
Close Brothers Asset Management	same as Q17
Combined financial Strategies ltd	No comment
Cranbourne Financial LLP	All listed in Q19
D Shearer	No comment
Dean Robertson	More regulated financial advise Less onerous regulation on de-minimis and/or simple products and services Better financial education at schools, colleges, universities Positive media Promotion of regulated financial adviser and the benefits it has
Douglas Baillie Ltd	Pension switches, pension transfers and at-retirement advice.
Entrust Financial Planners Ltd	approaching retirement consumers
Essential IFA	Pension accumulation and de-accumulation which should always be dealt with by a regulated authorised financial advice firm.
Esteem Money Ltd	A more positive approach to promoting the profession needs to be taken from the highest level, with a strong encouragement and endorsement for all to explore the opportunities available. The "Phone a friend" for a recommended adviser is a far better solution then any of the directories that exist.
Financial Foresight (NI) Ltd	Under 35's
Forward Plan IFA Ltd	Those who need advice but believe it is too expensive and yet by doing nothing cost themselves more in the long term
Halebarns Financial Planning Ltd	Less wealthy part of the populations
Hall Financial Planning LLP	regular savings
Highclere Financial Services	Protection and pension in that order
Intelligent Pensions	The retirement savings gap.
Investec Wealth & Investment	Those within the starting out, living for now and hard pressed categories. Saving for the future generically needs to be made easier, more straightforward and accessible for this section of the population. Whether a pension and/or ISA is used for saving would be down to understanding, transparency and accessibility. Because the old adage life assurance is sold not bought there is a decline in people taking out life assurance especially important to those starting out with young families, etc. This is something that also should be addressed- particularly with the online possibilities.
Iwan Jones	In the Pension options field
James Hay Partnership (Janet Morville-Smith)	Those in the retirement marketplace, as poor decisions cannot be reversed and the capital that is lost cannot be replaced by the retiree
John Lord	No comment
Jonathan Davis Wealth Management LTD	No comment
Joslin Rhodes Lifestyle Financial Planning	No comment
Katy Master	No comment

Respondent	Q21: Which advice gaps are most important for the Review to address?
Lemonade LLP	The 3 stated in Q19.
Lighthouse Financial Advice	all
Morgan Financial Ltd	Stop trying to make what has been developed as a service (I mean financial advice) run for profit by RDR (and even before then) as a service that can be offered at a low cost/free. Even CAB only offers information and not advice. The moment advice is introduced liability means the adviser must focus on time and cost. Remember the adviser's offering (commodity) is time and knowledge nothing else. That cost must be met.
Morgans Ltd	Those that currently do not appreciate what advice can offer need to be engaged.
Openwork Limited	Those referenced in Q19 are the most worrying as they perpetuate the very low UK Savings Rate, when compared to other Euro/Global economies. Recent changes to pensions legislation has led to an increase in non-advised activity by customers (in some cases prompted by providers), which we believe may lead to poorly judged actions and bad or sub-optimal outcomes.
Park View FP Ltd	Low earners and low resources as above
PCM Asset Management Ltd	N/A
Penguin	It needs to take all in to account
Polygon Financial Ltd	Educate peole about the value of advice.
Profile Financial Solutions	Advice to people with savings in overcharged, poor quality historic pensions (for example 5m+ Phoenix holders, perhaps 20m policyholders UK wide) i.e. modest accumulation situations. Advice to people with low to medium savings coming up to retirement i.e modest de-cumulation situations.
Prosperity Wealth Management Limited	The pensions gap will have the most significant near term impact particularly as consumers withdraw their retirement funds. that said, the lack of engagement by the younger consumer may have a greater long term impact
Protection & Investment Ltd	No comment
Richmond House Group	Those with smaller pension pots at retirement and encouraging the young to save and plan more.
Rob Coote	All
Rowley Goodall Ltd	No comment
Royal Mail	Older consumers and those with personal circumstances that limit their capacity to utilise digital platforms are often seeking financial advice in order to support taking an income in retirement as well as investing. It is these groups which can be most disadvantaged when financial advice is not readily available through non-digital platforms, including hard copy mail. Consequently, the campaign would suggest the advice gaps relating to these consumers are among the most important that the FCA should seek to address through this review.
Simplified Money Ltd	At retirement. Savers and investors second because they have time to play with. At retirement clients do not.
SK Financial	Financial education otherwise you are just building an expensive house on sand.
South West Financial Planning	Savings and Pensions - many consumers are totally unprepared
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	No comment
Sussex Independent Financial Advisers Ltd	No comment
Swallow Financial Management LLP	ALL
Taurus Global Financial Advisers Ltd	Mass market clients.
The Minster Partnership llp	people at retirement
Tom Orchard (Annetts & Orchard)	All gaps need reviewing and all are served with the same solutions, their need be no distinctions. This need not be over complicated, it is one of the reasons the gap has come about, get back to basics. More regulated financial advisers Less onerous regulation on de-minimis and/or simple products and services Better financial education at schools, colleges, universities Positive media Promotion of regulated financial adviser and the benefits it has
True Potential Wealth Management	Smaller lump sums, as mentioned previously a streamlined investment process would be better for certain clients and not take up as much time for the adviser.
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	All gaps are important as they are largely caused as a result of the long-term failure of regulation. It is the regulatory framework & resulting cost that this review needs to address

Respondent	Q21: Which advice gaps are most important for the Review to address?
Wishart Wealth Management Ltd	At retirement market First time home buyers with no mortgage life cover and critical illness (scared off by PPI?)

Respondent	Q22: Do you agree we should focus our initial work on advice in relation to investing, saving into a pension and taking an income in retirement?
2plan wealth management Ltd (Chris Smallwood)	We agree that the Review should particularly focus on this area as there is a sizeable portion of consumers who are willing and able to pay for advice, but not at current price levels and who are particularly interested in expert help with their pension choices.
Abi Stidworthy	No comment
Active Wealth Ltd	No, clients need protecting first. What if they die or become ill?
Advantage IFA Ltd	No, you should help the people at the lowest end of the economic spectrum first. They are the most vulnerable. For other you should advertise where they can find the information they need in an engaging way and make it easy to understand. Other than that don't bombard people, you can lead a horse to water but you can't make it drink. Tell them where they can get the information, tell them why it is important and then let them take some self responsibility.
Alison D M Segerman	Yes, but also also important is advice on the costs and risks of borrowing/credit ??- consult with Citizens Advice.
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	Saving in the short and long term is more important to address than taking income in retirement.
Aspire Online	Yes I agree but I think equity release should be included, its becoming a bigger and more important area for retirees
AXA Wealth	Yes
Barra Gorman	Yes due to major changes in UK pensions focus should be on this area as greatest need for advice persists
Berkeley Burke Group (Andrew Emery)	Yes, pension planning, both in the accumulation and decumulation phases is where there exists most widespread demand and complexity. Demand owing to auto-enrolment and initiatives designed to encourage private pension provision, and complexity in terms of ongoing legislative changes and transitional arrangements. This area, following pension freedoms/flexibilities being introduced, is also an area where clients are potential more vulnerable to fraud, such as via pension liberation scams. As such provision of at least an adequate level of guidance is needed to as much of the mass market as possible.
Berkeley Burke Group (Tony Durant)	
Blevins Franks Financial Management	These are the most common areas that small investors will be concerned with
Blue Scapes	Yes! However, I am a retired user and see the advantages, perhaps, more clearly than a younger user who is struggling to make ends meet. There are also broader issues that should be included - younger user / mid-life user / older user segmentation of appropriate information and assistance. A "whole of life" approach to encourage positivity / proactivity to finance etc
BPH Wealth Management LLP	Yes.
Brighton Financial Ltd	Absolutely.
Broad Wealth Management Ltd	yes
Browning Financial Planning Ltd	No, just stop meddling
Caleb Roberts Financial Management Ltd	Yes
Caledonian Financial Management Ltd	Yes
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	Partially must also include taking out credit and managing debt possibly more advice earlier on in preventing people from accumulating too much debt in the first place.
Chattertons	Advice should be; tax planning, life event planning and pensions.
Citygate Consulting Limited	Yes - I give educational seminars to companies whom I set up AE schemes for. The general standard of financial literacy and knowledge is shocking!
Close Brothers Asset Management	No comment
Combined financial Strategies ltd	All are interlinked and focussing on one will create issues elsewhere. If all you have in your tool box is a hammer the whole world looks full of nails. This is one of the biggest traps of financial advice and the need for advisers to specialise across the full range and spectrum of advice. The regulator needs to take this holistic view as well.

Respondent	Q22: Do you agree we should focus our initial work on advice in relation to investing, saving into a pension and taking an income in retirement?
Cranbourne Financial LLP	Yes as this is the main focus for most IFA/financial planner/wealth manager businesses. ?? However you should also review the protection market separately, as there is huge under-insurance in the UK for similar reasons - lack of financial education, lack of access to advice.
D Shearer	There has been a large focus on pensions which people see as far too far in the future (until it gets close!) but this is part of the need for starting to save towards retirement at a far earlier stage.
Dean Robertson	no comment
Douglas Baillie Ltd	Yes!
Entrust Financial Planners Ltd	Yes
Essential IFA	Yes as to not do so represents a considerable risk to the economy and personal individuals.
Esteem Money Ltd	Yes
Financial Foresight (NI) Ltd	Yes
Forward Plan IFA Ltd	Yes, but also protection. There is no point in saving for a pension and yet if the breadwinner dies early leaving the family in a poor financial position.
Halebarns Financial Planning Ltd	Less wealthy part of the populations
Hall Financial Planning LLP	yes
Highclere Financial Services	No, see above.
Intelligent Pensions	Yes, although the market for ISAs seems to have expanded without advice being a major feature, and so we think that saving into a pension and taking an income in retirement need the greatest support.
Investec Wealth & Investment	No comment
Iwan Jones	Yes
James Hay Partnership (Janet Morville-Smith)	Yes. How to take an income in retirement is a pressing advice requirement and represents a huge gap for small pot Savers
John Lord	No comment
Jonathan Davis Wealth Management LTD	the focus should be on investment portfolios - too much property backed by debt will be severely problematic in the future
Joslin Rhodes Lifestyle Financial Planning	Yes
Katy Master	No comment
Lemonade LLP	Yes
Lighthouse Financial Advice	yes
Morgan Financial Ltd	It needs to be more than that. We as an industry need to extend the focus to medium to long term holistic planning.
Morgans Ltd	No, protection is the keystone of financial planning. I re-iterate my comment at Q4. I have an issue with your table (p.10) illustrating the complexity of different financial issues. In particular the perceived simplicity of protecting against misfortune compared to other issues. Although you suggest that only 11% of respondents expected to need advice regarding protection insurance this is at odds with the ABI statistics that suggest 75% of pension, protection and long term insurance products (66% via IFAs) are sold with advice and 61% of protection products via IFAs.
Openwork Limited	We would prefer to see a root & branch review of what leads to the high costs of advice (regulation and supervision) in order to bring the costs of providing advice down.
Park View FP Ltd	Yes because its the initial advice to invest where a consumer can hand over 100's of thousands of pounds and this needs to be done for the correct client outcome.
PCM Asset Management Ltd	N/A
Penguin	Absolutely not - there is plenty of information and services out there - the protection gap is huge, too many families are under insured. In the US people are proud to sell insurance to families and protect them, we see it is something dirty that is uncomfortable to talk about - this has to be top of the list as too many families are on the bread line because someone wasnt insured when something happened to them
Polygon Financial Ltd	No, rather financial planning as you say we should do!
Profile Financial Solutions	Yes
Prosperity Wealth Management Limited	Yes
Protection & Investment Ltd	No, the review needs to include protection, auto-enrolment and those who have yet to build up assets.

Respondent	Q22: Do you agree we should focus our initial work on advice in relation to investing, saving into a pension and taking an income in retirement?
Richmond House Group	The focus should be on removing the barriers to entry not trying to tinker at the edges in the hope of addressing particular areas of advice. if the regulatory burden is reduced the free market will step in to fill these gaps.
Rob Coote	Yes
Rowley Goodall Ltd	No comment
Royal Mail	The Keep Me Posted campaign agrees that it would make sense for the FCA to focus its initial work in this area on those consumers seeking financial advice on investment and arrangements related to retirement. However, the campaign would also emphasise that it is important for the FCA to give consideration to how this advice is communicated to consumers, particularly given the challenges associated with accessing digital platforms for some vulnerable consumers.
Simplified Money Ltd	The latter is most important because the need is now. The former two, yes of course, but they have at least a little more time before their own need becomes as urgent as an at retirement one is. (see answer to Q21).
SK Financial	No. Start with financial education.
South West Financial Planning	Yes
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	no comment
Sussex Independent Financial Advisers Ltd	No comment
Swallow Financial Management LLP	No, these Gaps have been widened and exasperated by the RDR and should be addressed as a whole. The RDR has badly failed the UK public and continues to do so.
Taurus Global Financial Advisers Ltd	Yes.
The Minster Partnership llp	Yes
Tom Orchard (Annetts & Orchard)	Yes, I think that is a fair point, but a good financial adviser will also be pointing out that these consumers need to protect their ability to save with appropriate products and solutions. Forcing consumers to save in workplace pensions simply adds to the negativity around the products, as they have no understanding of the benefits of the products, simply the costs. The old ???salesmen??? of the direct sales forces may not have had the right qualifications and skills or a proper regulatory environment, some certainly did not have the correct ethics and were in firms of very poor culture, but they did explain the benefits and consequences of products, services and solutions in a way that consumers ended up better protected. If this ability to empathise could be combined with better quality products, working in a firm with a positive TCF culture and a better qualified professional adviser, the gap would be closed. If regulated advisers were given the tools to allow them to properly use their treasured trusted adviser status, like so many are lucky enough hold with our clients, the consumer outcomes would be far more positive for individual sand society as a whole. Order needs to be Stop unnecessary debt Understand household budgeting (stop unnecessary wastage) Protect the situation so it doesnt get worse Save Invest A lot starts with education (which advisers can deliver at institutional levels or at individual level)
True Potential Wealth Management	Yes but also Protection, clients will insure pets/phones and cars but are reluctant for themselves. We need to take a leaf out of USA where protection is the first line of defence for clients.
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	Yes but it is also an opportunity for a complete overhaul of regulation
Wishart Wealth Management Ltd	Yes

Respondent	Q23: Do you agree we should focus our initial work on consumers with some money but without significant wealth (those with less than £100,000 investible assets or incomes under £50,000)?
2plan wealth management Ltd (Chris Smallwood)	We agree that the focus of the Review should on consumers with lower asset levels, for example those with small to medium pension pots (between 30-60k).
Abi Stidworthy	I fell the base should be broader and start with educating everybody.
Active Wealth Ltd	No. What about the clients that do not knwo how to create wealth. There needs to be education!
Advantage IFA Ltd	No, see my answer to Q22
Alison D M Segerman	Yes, because these are the people who can least afford to pay a financial adviser
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	Yes
Aspire Online	no comment but sounds reasonable
AXA Wealth	Yes. But additionally those consumers who have significant wealth and or complex needs but dont, for whatever reason, currently access advice or a direct to consumer service. FAMR should consider an education programme to educate all consumers on the value of advice in whatever format is appropriate for them, so that when consumers become investors they seek advice automatically.
Barra Gorman	No comment
Berkeley Burke Group (Andrew Emery)	Yes, pension planning, both in the accumulation and decumulation phases is where there exists most widespread demand and complexity. Demand owing to auto-enrolment and initiatives designed to encourage private pension provision, and complexity in terms of ongoing legislative changes and transitional arrangements. This area, following pension freedoms/flexibilities being introduced, is also an area where clients are potential more vulnerable to fraud, such as via pension liberation scams. As such provision of at least an adequate level of guidance is needed to as much of the mass market as possible.
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	These are the groups who have most difficulty finding an adviser
Blue Scapes	Yes. It is they who will, with your help, have the potential to become the 'higher bracket' users further down the road. I am sure that you have the resources to cater for different categories, you must have advisors with a range of backgrounds, skill sets, and communication skills. Good financial advice is of paramount value to all sectors - surely
BPH Wealth Management LLP	Yes.
Brighton Financial Ltd	Tough one. You need to have a base line for income and capital. That said, a client with 100,000 capital to invest, in our view, would be willing and able to pay for professional advice. We feel it should be lower, say 50,000 capital and 25,000 income.
Broad Wealth Management Ltd	yes As previously said that work could be done on if education/awareness was improved then this could reduce when advice is required
Browning Financial Planning Ltd	No, just stop meddling
Caleb Roberts Financial Management Ltd	Yes
Caledonian Financial Management Ltd	Yes
Carolyn Callanan	I am within this bracket and the relationship I have built with my financial advisor over several years has been invaluable in my my decision making. It is this relationship and trust which I feel is so important when it comes to money matters
Chartered Financial Management (UK) Ltd	Yes - with regards to investing/taking income in retirement. But review also needs to focus on helping those people to manage/prevent high levels of debt.
Chattertons	You should focus on redefining advice and brokerage. This would solve the latter problem by providing a simplified route to market. There is no advice in what I'm proposing - merely a simple suitability assessment.
Citygate Consulting Limited	Yes - but without commission I fail to see where there will be an incentive for anyone to deal in this space. I would if I were paid by the government. That said, I wouldn't be surprised if you introduce a levy on adviser to those with greater assets to subsidise the bottom end of the market. Surely that is back to commission, except it is less efficient and also hugely punitive to advisers who now earn a lot less than pre RDR.
Close Brothers Asset Management	No comment
Combined financial Strategies ltd	Yes.

Respondent	Q23: Do you agree we should focus our initial work on consumers with some money but without significant wealth (those with less than £100,000 investible assets or incomes under £50,000)?
Cranbourne Financial LLP	I think so.
D Shearer	Yes, I suspect this group probably want to do something but don't know what . ALWAYS GOOD TO START DOING SOMETHING RATHER THAN JUST PUT IT OFF!??
Dean Robertson	no comment
Douglas Baillie Ltd	Yes, as many of these consumers will actually have > 100k in their accummulated pension funds, and not know it!
Entrust Financial Planners Ltd	No, why not people below that?
Essential IFA	I think the review should concentrate on all individuals wanting to receive financial advice, as previously stated segmentation is dangerous.
Esteem Money Ltd	Yes
Financial Foresight (NI) Ltd	Yes
Forward Plan IFA Ltd	No, on educating the whole population on the benefits of advice. People do not understand what financial advice is or the benefits. the standard of financial education and knowledge is very poor in the UK
Halebarns Financial Planning Ltd	yes
Hall Financial Planning LLP	yes
Highclere Financial Services	In respect of pensions, yes, but the protection gaps applies to all ages and income-levels.
Intelligent Pensions	We think that those consumers with earnings of more than 2 x state pension but less than ??50,000 should be the main focus group.
Investec Wealth & Investment	We believe the advice gap falls on those with some money but without significant wealth. Those with no assets and significant debts will be seeking a different kind of advice to that the industry can currently provide. In terms of investable assets it would seem that the advice gap is for those who have between 10,000 and 100,000 to invest as a lump sum and those who are basic rate taxpayers.
Iwan Jones	Definitely
James Hay Partnership (Janet Morville-Smith)	Yes. For the reasons outlined in response to the questions above.
John Lord	No. If an adviser gives the same advice to buy a fund to an investor with !k to invest and another with 100K to invest the second person pays 100 times as much for the same advice - that is fraudulent.
Jonathan Davis Wealth Management LTD	no, focus on 500k + investible assets
Joslin Rhodes Lifestyle Financial Planning	No comment
Katy Master	No comment
Lemonade LLP	Yes - although these limits need not be hard and fast
Lighthouse Financial Advice	yes very much
Morgan Financial Ltd	Again as before you are trying wrongly in my opinion to bracket people. For example someone in their 20s who inherits 95,000 could secure their long-term future with good investment and personal advice which is ongoing. If you say we cannot advise these people it would be to their detriment not ours as advisers. Are you saying a couple on 45,000 each won't be able to get financial advice
Morgans Ltd	This seems to have analogies with Martin Wheatleys comments to the Treasury Select Committee. When asked about the advice gap he said: People who have portfolios that are below I dont know what the threshold level is maybe 50,000 or 100,000 are not getting the same sort of service that they were getting, so that is a concern The ONS Wealth and Assets Survey (2012) states that 10.7% of the population have investable assets of 100,000 or more. So if your criteria are as broad as those with less than 100,000 investible assets or incomes under 50,000- then I think we are talking about the majority of the population. You need to lower this criteria, it might be relevant to London but not to the rest of us that work in the real world.
Openwork Limited	No strong views on the appropriateness of that focus, other than reinforcing our belief that the cost of providing advice itself is the main barrier to expansion.
Park View FP Ltd	Yes probably as I believe most clients above these thresholds already have access to good quality advice. That said you do need to review the costs in regulation and move away from a model where the good guys are paying for the bad guys...this is not sustainable.
PCM Asset Management Ltd	N/A

Respondent	Q23: Do you agree we should focus our initial work on consumers with some money but without significant wealth (those with less than £100,000 investible assets or incomes under £50,000)?
Penguin	Yes - absolutely
Polygon Financial Ltd	No.
Profile Financial Solutions	Yes
Prosperity Wealth Management Limited	We believe that the consumers above these levels are well served and the focus should be as stated.
Protection & Investment Ltd	Yes
Richmond House Group	See Q22
Rob Coote	Yes
Rowley Goodall Ltd	Yes
Royal Mail	The Keep Me Posted campaign would agree that the FCAs review might benefit from focusing on those consumers with some money but without significant wealth. This group is likely to include many of those most in need of financial advice, but with limited scope for accessing it. However, the campaign would stress that those with modest means from disadvantaged groups are likely to be those whos need to access financial advice is most acute. As part of its research into the impact of paper statements and communications on consumer behavior the Keep Me Posted campaign has maintained a particular focus on those consumers whos annual household income was under 15,000. This group includes many of those with a limited ability to access digital platforms and who, conversely, benefit most from the provision of financial advice and other services through traditional mediums such as post.
Simplified Money Ltd	Yes, we agree this is where the biggest need is. Particularly between 30,000 and 100,000 in a pension fund and facing imminent retirement.
SK Financial	No. I think you should start with the younger and vulnerable consumers
South West Financial Planning	Yes
Strategic Investment Solutions Ltd (Chris Kilner)	no comment
Strategic Solutions (Michael King)	No
Sussex Independent Financial Advisers Ltd	NA
Swallow Financial Management LLP	No
Taurus Global Financial Advisers Ltd	Yes- your figures are too high still though
The Minster Partnership llp	Yes
Tom Orchard (Annetts & Orchard)	Not really, I fell the base should be broader and start with educating everybody. Your thoughts above on suggested limits / levels would obviously help, and allow some margins in the relationship for advisers to enable a form of pro-bono that doesnt financially disadvantage them too much. However if possible a much broader brush should be used. As there were 26.7 million households recorded in the UK in 2014, whatever you do will need to be categorised, as with only around 22,000 advisers, many of whom would not be interested in helping consumers to becoming their new clients, it would still mean an average of a little over 1200 clients per adviser, unmanageable by a ratio of 3 or 4 times, on a conservative basis, some would say that is closer to 10x maximum numbers with current regulations!
True Potential Wealth Management	Yes
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	Yes as it is these groups that have most suffered from the post-RDR lack of provision of advice
Wishart Wealth Management Ltd	Yes

Respondent	Q24: Are there aspects of the current regulatory framework that could be simplified so that it is better understood and achieves its objectives in a more proportionate manner?
2plan wealth management Ltd (Chris Smallwood)	There should be clear definitions between the different types of advice. In particular the boundaries between simplified advice and full advice need to be clear and unambiguous. This would pave the way for a simplified advice model with clear guidance on the key elements of suitability. The role of the Financial Ombudsman Service needs to be reformed. The FSCS levies and the way they are raised are also significant factors which put pressure on firms??? finances and hinder firms ability to innovate and create more stream-lined services. There is the need for better regulation, which would reduce regulatory costs for firms. For example: - reducing reporting requirements, which take up a considerable amount of a firms time and resources; - freezing the regulatory bodies budgets in nominal terms for three years; - simplifying the FCA Handbook, by reducing its length by a third over three years. - bringing back the regulatory fines to reduce the cost of regulation.
Abi Stidworthy	No comment
Active Wealth Ltd	Yes. Cut our bureacracy and costs
Advantage IFA Ltd	Seriously, have you counted how much paperwork you have issued in the last year? 1. Stop changing your name. 2. Do away with all of the periphery organisations and have a simple regulator who oversees the role of FCA, FOS and FSCS in one. Have one information service and merge Pensionwise, TPAS and MAS. Stop CAB overlap with MAS etc. 3. Consumer education. Make them aware when they are responsible and what to look out for. 4. Introduce a product levy to cover regulatory costs so advice costs can come down and reduce the advice gap. 5. Better governance, I think there needs to be better accountability and oversight of how the regulatory bodies meet objectives. I would expect the same of any institution.
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	Yes. Simplify the process of saving into products like ISAs and personal pensions by reducing the advice requirement and level of reporting needed. Cutting back the need for full suitability would allow faster lower cost delivery. This needs to be managed in conjunction with the Financial Ombudsman to ensure that advisers are not walking into an undefendable claim in the future
Aspire Online	no comment, don't feel I know enough
AXA Wealth	Yes. See response to Q2 & Q16. A tiered regulatory approach (suitability, qualifications etc) to personal recommendations based on the product complexity or risk with simpler products attracting lighter touch regulation. Consider the availability of remuneration through commission rather than adviser charge for personal recommendations linked to simpler products.
Barra Gorman	Focus should also be on unsuitable products promoted to public by unregulated & unethical individuals
Berkeley Burke Group (Andrew Emery)	How the regulator regulates - Libertatem, the trade association that represents UK financial advisers, has proposed that a new regulator be established solely for the purpose of regulating financial advice. This proposition has received wide support for the following reasons. The regulator can concentrate on building a closer relationship with the adviser community and understanding of adviser/client relationships Reduction in levies, the adviser community pays levies to support solely this new regulator, and that other regulated entities, such as product providers, support the existing regulator. A new regulator, concentrating solely on the adviser community, should operate in a more targeted, efficient and transparent manner. All this should, it is claimed, help fulfil the goal of reducing the cost of advice for the mass market. There are obvious advantages from this suggestion, and how viable an alternative this suggestion is should be given due consideration. However, what is beyond doubt, is that the way in which the FCA regulate presently, based on an outcomes focused philosophy has further hindered regulatory clarity, it is indeed true to say that ???there is a degree of subjectivity involved in judging whether firms have complied. As such, this only serves to further exacerbate the advice gap, as firms restrict advice to lower risk clients, and not the mass market, through fear of future liability. The FCA, in its current form, can do much to bring clarity and transparency back to the market by scrapping outcome focused regulation in favour of a rules focused philosophy. Rules based regulation, based on clear and transparent guidelines, is far clearer than outcomes based regulation. This clarity can help advisers re-engage in the areas of advice and with those clients currently being ignored. For example, a rules based FCA can help advisers deal with the dilemma posed by insistent clients. Also worth consideration is whether the FCA can delineate between full face to face advice and automated robo-advice in its regulatory stance Would principles based regulation be adequate for face to face advice, for the reasons given above, and outcome driven regulation be applied to robo-advice, given the question marks surrounding the sophistication and quality of client outcomes, covered above, in respect of automated algorithmic advice provision? The Longstop Review As part of RDR the FSA previously reviewed whether a longstop was needed, but concluded that consumers needed recourse to redress from an adviser firm in relation to long term products or services where the outcome of the advice is uncertain until many years following the advice being given, such as in respect of pensions, investments and mortgages. Also the FSA argued that the lack of a longstop helps encourage consumer take up of advice, as consumers have the confidence to take advice knowing they can be compensated if the advice is unsuitable.

Respondent	Q24: Are there aspects of the current regulatory framework that could be simplified so that it is better understood and achieves its objectives in a more proportionate manner?
	However, the adviser community have argued that: Ongoing liability for advice discourages provision of advice for long term products and the mass market consumer. Increases the risk of ongoing liability and thus pushes up the price of initial and ongoing advice. Deters new advisers entering the market and hinders their ability to leave the market, due to enduring liability. Inflates adviser overhead costs, such as more expensive professional indemnity insurance.Despite the FCAs insistence that there are relatively few awards by the Ombudsman made against financial advisers..relating to incidents longer than fifteen years ago, the above arguments seem valid, evertheless any resolution requires the fine balancing of client and adviser interests. Of the five options the review considered, maintaining the current regime, introducing a single longstop, introducing a varied limitation longstop (linked to terms of products), enhanced professional indemnity insurance and a compensation fund, I would opt for maintaining the current regime.Introducing a single longstop: Introducing a single longstop may not sufficiently protect the interests of the consumer, particularly where the outcome of the advice cannot be properly appraised until after the longstop period has elapsed. Introducing a varied limitation longstop: There is more credibility to this argument, however there still exists the risk that a less than informed client may be the victim a poor advice outcomes. What parameters are used to decide which products are given longer longstops than others Enhanced professional indemnity insurance: How likely are insure PI insurers to introduce professional indemnity products for advisers, given the enhanced insurance risks, at premium levels that the advisers consider fair and proportionate? Would this presumed additional PI cost be passed on to the consumer through increased advice fees, and further widen the advice gap due to costs? Compensation Fund: This is another credible proposition, however good practice should dictate that an adviser firm set aside sufficient funds to cover potential compensation as a matter of course. Furthermore, applying a compensation scheme levy on firms across the advisory market further raises overheads, considering these firms already contribute a FSCS levy. Additionally, why should firms that do not offer long term product advice, or are at less of a risk of ongoing liability, pay an equal levy to those firms that are more exposed to the risk of long term liability Maintaining the current regime: The argument remains that a financial adviser should be culpable and responsible for the quality of the advice given, and held to account should compensation be justified for poor outcomes. As there are few awards by the Ombudsman for long term poor advice, is a change from the status quo justified? Just how potent are the risks to advisers in respect of ongoing long term liability? There is no guarantee that reducing consumer protection, through implementing a longstop, would encourage profit making firms to provide advice to lower earning consumers, medium to higher income clients would still be more profitable and desirable. The outcome will be that consumers, irrespective of their income, will have less regulatory protection, therefore there would be a transfer of risk from the advisers to consumers. This could very well further undermine long term consumer confidence in financial advice. This said, the current regime must be supplemented by measures designed to mitigate and address the points raised by proponents of the longstop.Rules Focused Regulation: Financial advisers must retain responsibility for the enduring quality of their advice, however rules based regulation will help advisers provide advice with more confidence and nullifies the need for a longstop. If an adviser follows a clearly defined checklist of rules, provided by the FCA, provision should be made that no future liability should be borne by the adviser, in as much as they will have been deemed as doing everything that is reasonable, based on clear defining rules, to ensure a positive client outcome. Shared Liability: Where ongoing liability does exist it may be that advisers and product providers share, perhaps not in equal proportions, the ongoing liability. And what of the industry Regulator?The FCA appears to be a bureaucratic organisation, run by bureaucrats and for the real benefit of nobody in particular - except for the bureaucrats of course! The industry regulator, for the financial advisory sector ONLY, should be controlled by people from the "coal-face" of the industry and not the C.E.O. of this major conglomerate, or that multi-national organisation. Unless a financial services Company employs under 100 people in total, it is unlikely that the C.E.O./C.O.O./M.D./Chairperson/etc. has any idea whatsoever what the problems (and the resolutions) in the "real" (actual) financial services world are.
Berkeley Burke Group (Tony Durant)	The current regulatory framework seeks through the back door to be pursuing an objective of eliminating the bespoke, non-advisory, SIPP industry. Separate events lead to an understanding of the FCA's overall plan to curtail the use of a SIPP for non-standard asset investment, which is totally contrary to the "raison d'etre" for SIPPs, and this Government's expressed intention to encourage individuals to take responsibility for their own investment decisions. There is also the question that such curtailment is in breach of both the UK and European legislation.In January 2014, the FCA launched investigations of a number of SIPP Providers who were perceived to operate a relatively large number of SIPPs invested in ?non-standard investments. Some of these firms were banned from accepting any further non-standard investments, other than UK commercial property. A number of these firms no longer exist as they were forced to sell or close their businesses.In May 2014, a FOS Ombudsman, possibly influenced by the FCAs investigation of SIPP Providers, arrived at a "rogue" decision in respect of a complaint from an Investor, who had ignored four warnings that his proposed investment was high risk, speculative, difficult to value and, therefore, potentially unrealisable. The Investor further confirmed that the Provider was not involved in his investment decision, and acknowledged that the Provider was precluded from giving investment advice, and that he had chosen to ignore the Provider's recommendation that the Investor should seek professional investment advice before proceeding. He, therefore, gave the Provider "execution only" instructions to proceed with his chosen investment on a non-advised basis. The Provider had to carry out the Investor's instructions immediately without further delay in order to comply with the FCA's own rules under COBS 10 and 11.Despite being totally aware of all the facts of the case, the Ombudsman determined that the Provider should compensate the Complainant as he felt that the Investor should not suffer financially as, in his opinion, as complainant, he had limited understanding of what he had signed and agreed to, and that, in some way, the Provider should have persuaded the Investor not to proceed with the investment which would, of course, have constituted the giving of advice, which the Provider was not legally able to provide. This FOS decision was challenged by the Provider who sought a Judicial Review, which was stopped at the request of the FOS who recognised that it was a "weak" decision, and offered a solution by obtaining the agreement of the complainant to waive his right to the compensation awarded under the first final decision, and to rely on the determination of a Second Ombudsman who would review the complaint.The Second Ombudsman reversed the original decision, and found in favour of the Provider, and reached the second provisional decision at the end of June this year, allowing both sides an opportunity to address the Ombudsman's reasoning for the reversal of the original decision, before the deadline to post the second final decision, at the end of August 2015. Inexplicably, the FOS have delayed posting the final decision, and continue to make enquiries totally unrelated to the complaint and, therefore, beyond the FOS' remit in an effort to delay the posting of the final decision.

Respondent	Q24: Are there aspects of the current regulatory framework that could be simplified so that it is better understood and achieves its objectives in a more proportionate manner?
	It is worth noting at this point, that the same FOS Ombudsman has made a determination in favour of an Investor in connection with draw down advice from an IFA, which is now being referred by the IFA firm for a Judicial Review. If this Decision is upheld, it is yet another example of the significant effect of a FOS Ombudsman?s rogue decision affecting a whole sector of the IFA market. There are similar problems being experienced industry wide. FOS is now assuming responsibility for undertaking systematic reviews into the whole of a Firms operations, including individual Firms staff training programmes, and their processes of doing business, rather than confining themselves to assessing individual complaints. They are acting like a branch of the FCA, rather than ensuring that the complainant is being treated fairly. The FOS, despite having a Memorandum of Understanding with the Pensions Ombudsman Service (POS), is trying to investigate SIPP Providers in respect of non-advised, non-standard asset investments, effected on an execution only basis. This should be the responsibility of the POS and not the FOS. It appears that, on the ground, the FOS does not want to cede power to the POS and that this is causing problems, as the FOS are not equipped to deal with non-advised cases, as they assume that all firms should advise.The effect of the delay on the whole SIPP Provider Industry should not be under-estimated as, until the final determination, many of the Providers and the IFAs have, for the past 18 months, ceased handling non-standard investments, and will not re-enter the market until a favourable decision, reversing the original decision, is posted. This delay has been more than useful to the FCA in buying time before it is able to introduce its Capital Adequacy rules in September 2016, which will finally deter IFAs and Providers from using a SIPP for non-standard investments, the reasons for which are already set out in our riefing note sent to you previously. If you then bring into the equation the FCA's proposed Capital Adequacy rules for SIPP Providers to be introduced in September 2016, which will, effectively, destroy the non-standard investment market using a SIPP Wrapper, it could be concluded that the FCA, as part of a pre-determined plan, decided, initially, to target certain SIPP Providers as a warning to the remainder of the SIPP Provider Industry, and that it has been successful in its objective in curtailing the use of a SIPP to invest in a non-standard asset, which has bridged the period of time that it would take the FCA to effectively close this sector of the Industry in September 2016, when the new Capital Adequacy Rules will come into force.In our opinion, the FSA/FCA, in collusion with the FOS, have planned the closure of the SIPP market to non- standard investments which is the main purpose of a SIPP in the first place. It is estimated that the proportion of non- standard investments held in SIPPs is only 20% of the whole of the non-standard asset market, which is still very active, where of course, there is no regulation.The conclusion must be that, when the FSA/FCA were first made aware by the FOS, probably in 2011, of a growing level of complaints from Investors whose non-standard SIPP investments were in "distress", the FSA/FCA, realising that there was a "loophole" in their supervision as regards non-advised, non-standard assets held in SIPPs, decided to deflect direct responsibility being placed on themselves, and so determined that they should initiate a strategy to transfer the responsibility to the SIPP Providers by trying to suggest that the Providers had a responsibility to carry out "due diligence" on the proposed investments and, in some way, should have deterred the Investor from proceeding with the investment, if it was considered high risk or speculative, even though the SIPP Provider was precluded from giving investment advice. □
Blevins Franks Financial Management	The creation of evidential rules to clarify what does not break rules such as suitability and appropriateness, as this is an area of concern. Advisers concerned about FOS claims will want to be able to mitigate these risks without access to regulatory experts
Blue Scapes	No comment
BPH Wealth Management LLP	No comment
Brighton Financial Ltd	I'm not sure consumers are fully aware of the 'regulatory framework' even though we explain it to them. It may be useful to explain in clearer terms to consumers what the regulatory framework actually is, what it is designed to do and how it protects consumers.
Broad Wealth Management Ltd	No comment
Browning Financial Planning Ltd	No, just stop meddling. Stop making up silly review after review, cut red tape don't increase it. Pretend for a moment you were a business not a regulator and what you propose had to be sold to your clients (ie us) rather than enforced.
Caleb Roberts Financial Management Ltd	No
Caledonian Financial Management Ltd	If the FCA handbook was written in plain English this would make it much easier for advisers to understand what their responsibilities were under the rules.
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	Increase professionalism in the regulated advice market (to Level 6 minimum); help restore public trust in financial services and promote the benefit that sound advice can provide; regulate consumer complaints handling and more closely monitor the conduct of claims management firms; restrict the influence that PII insurers can have on determining the shape of the regulated advice market
Chattertons	Other than the possibility of a restricted financial adviser we are happy with the current regulatory structure. If the regulator wishes to define new categories of operative then that is fine.
Citygate Consulting Limited	If the government stopped moving the goal posts in relation to pensions then it would make life easier for the general public. While it continues, I simply have more advice to give largely at my expense.
Close Brothers Asset Management	na
Combined financial Strategies ltd	Yes. We need proper rules and guidance of what is expected in the advice process so that we can meet those needs in the most consumer friendly way possible. Reason Why/Suitability Letters are ridiculous these days with the majority written to protect us as advisers rather than for the benefit of clients. However, this will need to be done in a joined up way with the FCA and Ombudsman working with the profession. At the moment we have suck it and see regulation where the FCA says try it and then we will assess if it works. Not good enough.
Cranbourne Financial LLP	No comment
D Shearer	As said, over-regulation is now a danger.
Douglas Baillie Ltd	Yes, most defineitely: What advisers need is a clear and umbiguous set of regulations to follow, and the facility to openly discuss any problems of interpretation with the FCA, in the expectation of receiving a clear and concise answer. This is sadly lacking at present. One possible solution might be a clearly defined process leading to 'focussed or limited advice', with a suitable, but brief, relevant fact-find, on a restricted advice basis.

Respondent	Q24: Are there aspects of the current regulatory framework that could be simplified so that it is better understood and achieves its objectives in a more proportionate manner?
Entrust Financial Planners Ltd	The longstop - completely unfair and a huge barrier to advice FSCS levies funding - the polluter doesn't pay - the good guys do - again totally unfair and forcing firms out of business - Treasury give FCA fines back will help to some extent - Have a product levy as mentioned earlier Scrap the handbook and start again - it's not fit for purpose Scrap MAS and let the industry provide the info Make the FCA accountable, they just laugh at the TSC - they should adhere to the Regulators Code, having an unaccountable regulator is not good for the industry or consumers To reduce costs also reduce numbers at the FCA - move headquarters to somewhere cheaper - remove final salary scheme
Essential IFA	As previously stated I do think that the FCA needs to put a greater emphasis on consumer responsibility instead of putting all liability on adviser practices. I also believe that any unregulated product should never receive compensation from the FSCS even though a regulated adviser may have given advice on it.
Esteem Money Ltd	A better understanding of how businesses work with consumers in real life needs to be at the heart of the review, to make it easier for consumers to get good advice and firms be able to deliver it.
Financial Foresight (NI) Ltd	No
Forward Plan IFA Ltd	Yes. At the moment it is easier for someone to borrow ??15,000 than to invest into a stocks and shares ISA. This is the wrong way round. If a client has the funds to invest into an ISA an adviser needs to know the client, assess and recommend a suitable contract and funds and ensure this is compliant, and potentially recommend paying of debt first. However a person can go online and after a basic credit check can borrow that amount. the process for smaller investments, pensions needs to have a lower level of compliance commensurate with the level of investment and this for all advisers.
Halebarns Financial Planning Ltd	Advice charges could be brought down if advisers overcame their distrust of the regulator and FOS, particularly in relation to past advice. Advisers stuff their customer reports with caveats to protect themselves from retrospective regulatory action, to the detriment of consumers, as it is avery expenive process.
Hall Financial Planning LLP	reduce the regulatory burden. allow simpler levels of advice for those with small investible funds.
Highclere Financial Services	There seems to be rosy-spectacled view that all consumers want, can afford and would benefit from a full financial review. This extends to the expectation that a fact-find reflect every aspect of the clients affairs. Whilst idea in some fictitious nirvana the reality is that consumers generally approach their adviser for one thing - a mortgage, a pension, a savings plan, etc. The proliferation of information requested and subsequently provided - IDD, Client Agreement, Key Facts, explanatory brochure, and so on makes it overly complex, time consuming and ultimately too expensive for all but the HNW. If the regulator contained more ex-advisers and less committee-sitters and bureaucrats then maybe the situation would be different.
Intelligent Pensions	The rules for simplified and focused advice should be combined under the heading 'specific professional advice' and that to encourage the development of this lighter touch advice market there should be clear and unambiguous guidelines for advisers to work to, while accepting their responsibilities under TCF etc. and the risk of needing to compensate their customers where advice has been unsuitable or not delivered in cordance with the guidance. Consumers would be encouraged to use this advice option in the knowledge that it is regulated advice. Employers would also be encouraged to facilitate advice to members in the knowledge that it is regulated advice, and that their employees would therefore have recourse to compensation via FOS if necessary, rather than the employer fearing claims against itself.
Investec Wealth & Investment	na
Iwan Jones	Reduce the fear of being sued
James Hay Partnership (Janet Morville-Smith)	The current scheme for funding the FSCS is flawed: compliant firms cover the cost for non compliant firms. Currently the levies for bodies such as FCA/FOS/FSCS/MAS etc are ultimately borne by the clients through increases in adviser and product provider charges it would be better to delineate between advice and product sales so that theres more appropriate funding of the FSCS, in other words make the polluter pay so that the well run firms dont have to pass the cost onto their clients.Aligning the compensation limits for pensions, insurance based and trust based, would simplify customer understanding of how much cover they are provided and remove the disproportionate limits which current disadvantages customers in trust based schemes.
John Lord	No. If an adviser gives the same advice to buy a fund to an investor with !k to invest and another with 100K to invest the second person pays 100 times as much for the same advice - that is fraudulent.
Jonathan Davis Wealth Management LTD	less reporting by firms more focus on reckless lending
Joslin Rhodes Lifestyle Financial Planning	I think the fact that you've asked the question, answers it.
Katy Master	No comment
Lemonade LLP	Certainly - although we do not have sufficient knowledge to provide a solution
Lighthouse Financial Advice	yes
Morgan Financial Ltd	Yes the complaints process. The idea that trying to do the right thing could result in a massively costly upheld complaint puts me off encouraging bright people to come into our industry.
Morgans Ltd	Consumers find the different regulatory tiers and resulting types of adviser confusing. If we can make a financial health-check the norm it will act as a trigger to advice. If we can find a way of making a simplified advice tier work and it dovetailing with a generic service then it would help.
Openwork Limited	See previous commentary on introduction of safe harbouring.
Park View FP Ltd	No comment
PCM Asset Management Ltd	No comment
Penguin	Regulate the products better
Polygon Financial Ltd	How long have you got!
Profile Financial Solutions	No comment

Respondent	Q24: Are there aspects of the current regulatory framework that could be simplified so that it is better understood and achieves its objectives in a more proportionate manner?
Prosperity Wealth Management Limited	Capacity for loss: We feel that this remains far to open to individual interpretation leading to the potential for significant consumer detriment and the FCA should be far more prescriptive in the assessment of this. The use of risk profiles continues to be misunderstood and over relied upon by advice firms. Although this is in line with regulatory outcomes that are quantifiable behavioural economics would suggest that risk profilers are only ever useful as snapshot indicator and over relied upon.
Protection & Investment Ltd	No comment
Richmond House Group	See Q16. In particular: FCA to regulate more effectively to reduce FSCS costs a 6 year long stop (good enough for HMRC) Cease compensating for unregulated products Abolish Gabriel returns for smaller firms use fines to offset FSCS fees
Rob Coote	Don't know
Rowley Goodall Ltd	No comment
Royal Mail	The Keep Me Posted campaign is eager to ensure that all financial service customers benefit from a similar level of support and protection. At the same time, we believe that it is important that service providers are granted flexibility in the way in which they share information with their customers. Nevertheless, in order to ensure consistency in the way in which information is shared by the various service providers, we feel that there is a need for clear guidance on the way in which those providing financial advice communicate with consumers.
Simplified Money Ltd	Guidelines for simplified and focused advice and for the way those would be viewed by the FOS should a claim come up (see answer to Q2).
SK Financial	no immediate comments on this.
South West Financial Planning	Regulation as led to information overload of disclosure and recommendation to clients. Regulation is based on idealism and not reality. It is notable that this is not what the consumer wants, just a result to ensure compliance to the regulatory regime. There needs to be a simpler disclosure document and simpler and informative advice confirmation letter.
Strategic Investment Solutions Ltd (Chris Kilner)	FCA appears to be unnecessarily hesitant and should be challenged on how they deal with basic File Competence. The lack of a clear acceptable standard in the context of 20,000 firms using; Know your Customer Fact Finds and Focussed Fact Finds Attitude to Risk and Capacity for Loss profilers Suitability Letters for Regulated Products I would suggest this vital area is revisited and a change of approach considered. The FCA is creating unnecessary subjectivity and grey areas. There are Professional Organisations such as PFS and APFA, there are Compliance Service Groups and Networks who could help deliver a standardised approach. I expect the FCA will be worried about endorsing an approach that might subsequently be deficient and this I would respectively point out where a change in mindset is needed. If a limited number of authorised/approved base documents and processes are reviewed regularly with the Regulator and necessary amendments made the overall outcome would deliver greater certainty and less subjectivity. This would help codify standards for Monitoring of cases and help in case of Client complaint. The FCA own file monitoring would become more efficient because the base documents would be correct. I accept the application and input by an individual IFA in a small number of cases may be proven wrong but the vast majority of cases would be compliant. The outcome would less expensive subjectivity and Grey Areas for Clients, Regulators, FOS (think of the benefits of greater certainty) PI Insurers and the IFA MARKET. It has got to be worth a trail, and must be worth exploring to see if any improvements are made. S166 REPORTS When you consider the budget of the Regulator and the ever increasing cost, S166 Reports should not be used as a means of Monitoring for small firms. It is disproportionate to the outcome. There needs to be a compelling resource argument which in the context of the current position I do not think has been made. The Regulator should be required to monitor firms and the costs should be paid for out of the overall budget. I believe this is an example of poor oversight and control and abuse of power by FCA.
Strategic Solutions (Michael King)	No comment
Dean Robertson	A range of products and de-minimis limits that both the regulator and the Ombudsman agree FOREVER can have a simpler requirement. An (adviser driven) decision tree using a focused fact find for specific areas, not needing full expensive holistic planning and complicated (liable for the advisers lifetime) solutions. An educated consumer would also make the whole advice process simpler.
Sussex Independent Financial Advisers Ltd	NA
Swallow Financial Management LLP	No comment
Taurus Global Financial Advisers Ltd	Yes- ban immediately ALL NON regulated assets and UCITS funds from being placed in ANY pension plan ever. Allow only regulated OEICS, unit trusts and investment trusts, ETFs to be placed in a SIPP or pension plan.
The Minster Partnership llp	no

Respondent	Q24: Are there aspects of the current regulatory framework that could be simplified so that it is better understood and achieves its objectives in a more proportionate manner?
Tom Orchard (Annetts & Orchard)	A range of products and de-minimis limits that both the regulator and the Ombudsman agree FOREVER can have a simpler requirement. An (adviser driven) decision tree using a focused fact find for specific areas, not needing full expensive holistic planning and complicated (liable for the advisers lifetime) solutions. An educated consumer would also make the whole advice process simpler. The more advisers that become part of trusted regulated firms would mean less compromise with rules and regulations. Helping earmarked quality regional firms attract, authorise, regulate and develop quality new recruits would solve a lot of problems. One and two man bands cannot help, large national firms have a vested interest in their own manufactured products and even now, we still witness them being able to bend the rules and in some cases do what they want, so would return us to the bad old days. I do feel that is where we are heading right now though.
True Potential Wealth Management	Se previous streamlined advice process.
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	The entire regulatory framework should be refocused so that those that create the most problems are more closely regulated
Wishart Wealth Management Ltd	To take on new client and meet all regulatory and money laundering rules costs well over 1,000 for quality IFA/adviser firm - the levels of administration and paperwork are simply astonishing - this process needs streamlining. Example. Issuing a generic terms of business and fee agreement (IDD) then a client specific fee agreement is triple work - and for what purpose? Whose benefit? Add to this KFDs and KIIDs and the consumer is often left reeling under the barrage of paperwork.

Respondent	Q25: Are there aspects of EU legislation and its implementation in the UK that could potentially be revised to enable the UK advice market to work better?
2plan wealth management Ltd (Chris Smallwood)	MIFID II will potentially lead to us having to record all of our adviser telephone calls and electronic communications. Early IT estimates suggest a further ??0.3m initial investment with running costs of a similar quantum, which does not include the people costs of utilising this additional functionality. This is a very high cost for an additional safeguard that brings only marginal benefits in our view
Abi Stidworthy	No comment
Active Wealth Ltd	This would take too long to aanswer
Advantage IFA Ltd	MIFID II looks like it will add to the cost of advice as it will increase workloads, IT costs and staff training costs. I know new clients and existing clients who do not like the idea of calls or meetings being recorded. Any instruction to deal that I take must be written by a client so why require recordings?
Alison D M Segerman	no comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	No comment
Aspire Online	same answer
AXA Wealth	Yes. The financial services markets in the EU are quite broad and in some circumstances are fundamentally different to the UK. This can create unintended consequences for UK firms.
Barra Gorman	na
Berkeley Burke Group (Andrew Emery)	It is not possible to comment on this area until the introduction of MiFID II (or otherwise) has been agreed and published. It is generally believed that the original introduction timescale (from January 2017) is likely to extend to January 2018, possibly even longer. This legislation is only relevant should the UK decide to remain as part of the EU at the Referendum
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	The ability to split advice into personal recommendations and other advice under IDD
Blue Scapes	No comment
BPH Wealth Management LLP	No comment
Brighton Financial Ltd	Don't know.
Broad Wealth Management Ltd	No comment
Browning Financial Planning Ltd	no comment
Caleb Roberts Financial Management Ltd	Don't know
Caledonian Financial Management Ltd	no comment
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	Increased legislation can lead to increased litigation where errors are made, and this threat is contained as far as possible by ensuring that the processes, staff, systems and controls within a regulated business are able to meet the rules. This increased cost creates the advice gap. Keep the legislation (as this is the framework that keeps the advice market consistent) but focus regulation on the claims management threat that could widen this advice gap.
Chattertons	A lot of RDR was not covered in EU legislation, but it would appear that EU nations are bringing themselves up to our standards.
Citygate Consulting Limited	Not that I am aware of, unless the abolition of commission is an EU directive!
Close Brothers Asset Management	no comment
Combined financial Strategies ltd	The UK is one of the few nations which has independent financial advise as an industry. The FCA needs to treasure this valuable service and resource and make sure that European regulation does not destroy this industry. European advice is predominantly tied/restricted.
Cranbourne Financial LLP	No comment
D Shearer	I don't know but any EU issues need to be minimised.
Dean Robertson	no comment
Douglas Baillie Ltd	Yes: MiFFID is often contradictory to other reguatory rules, such as The FCA Handbook, The COBS Rules, and Perimiter Guidance.
Entrust Financial Planners Ltd	No comment
Essential IFA	No comment
Esteem Money Ltd	Don't know
Financial Foresight (NI) Ltd	Not aware of any.
Forward Plan IFA Ltd	no comment

Respondent	Q25: Are there aspects of EU legislation and its implementation in the UK that could potentially be revised to enable the UK advice market to work better?
Halebarns Financial Planning Ltd	Don't accept it all.
Hall Financial Planning LLP	No comment
Highclere Financial Services	N/A
Intelligent Pensions	Unable to comment.
Investec Wealth & Investment	no comment
Iwan Jones	Not sure
James Hay Partnership (Janet Morville-Smith)	na
John Lord	I know of nothing specific but would anticipate anything the EU brings to the party complicates it and adds to cost
Jonathan Davis Wealth Management LTD	No comment
Joslin Rhodes Lifestyle Financial Planning	no comment
Katy Master	No comment
Lemonade LLP	Certainly - although we do not have sufficient knowledge to provide a solution
Lighthouse Financial Advice	yes
Morgan Financial Ltd	EU legislation is not an issue at all.
Morgans Ltd	No comment
Openwork Limited	MIFID II will potentially lead to us having to record all of our adviser telephone calls and electronic communications. Early IT estimates suggest significant initial investment with running costs of a similar quantum added to the people costs of utilising this additional functionality. This indicates significant cost for an additional safeguard that brings only marginal benefits to the consumer in our view.
Park View FP Ltd	No comment
PCM Asset Management Ltd	No comment
Penguin	no comment to offer
Polygon Financial Ltd	Our advice should be focussed on what is appropriate to people in the UK. Our regulation shoud only be driven by the UK environment.
Profile Financial Solutions	No comment
Prosperity Wealth Management Limited	No. We believe the UK regulator sets higher standards than the proposed EU standards.
Protection & Investment Ltd	No comment
Richmond House Group	Exit the EU
Rob Coote	No idea
Rowley Goodall Ltd	No comment
Royal Mail	Research conducted by the Opinium polling firm, on behalf of the Keep Me Posted campaign, found that a majority of the population (84% of adults) are unhappy when companies take away their right to choose how they are communicated with, but there is currently little legislation or regulation to prevent this happening. Despite this, a number of European Union Member States have seen high profile campaigns to educate consumers about their rights. This has included the Austrian Post???s campaign to further educate consumers about their right to choose. Meanwhile, in France the French Consumers Organisation ???60 millions de consommateurs ??? Institut national de la consummation??? has led a similar consumer campaign and as a result a decree was adopted on 31 December 2013 which includes the obligation to provide a paper version of bills upon simple request by the customer. These initiatives within individual member states are welcome, however they fall short of providing specific EU legislation which the Keep Me Posted campaign would recommend is implemented in this area here in the UK.
Simplified Money Ltd	No comment
SK Financial	No immediate comments on this
South West Financial Planning	Don't know
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	No comment
Sussex Independent Financial Advisers Ltd	NA

Respondent	Q25: Are there aspects of EU legislation and its implementation in the UK that could potentially be revised to enable the UK advice market to work better?
Swallow Financial Management LLP	No comment
Taurus Global Financial Advisers Ltd	No comment
The Minster Partnership llp	More open arrangements between member countries to allow advice to be given across borders.
Tom Orchard (Annetts & Orchard)	A broad brush pan European approach is ridiculous.
True Potential Wealth Management	N/A
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	Don't know
Wishart Wealth Management Ltd	Not that I can think of or know of

Respondent	Q26: What can be learned from previous initiatives to improve consumer engagement with financial services?
2plan wealth management Ltd (Chris Smallwood)	There have been previous initiatives which attempted to introduce straightforward products at low prices, supported by simplified advice requirements. However these were not particularly successful. These initiatives were not adopted by firms due to the lack of clarity between the boundaries of different types of advice. Simplified models would clearly cater for a wider market, but the development of such services is inhibited by concerns of how FOS would treat them in case of consumer complaints.
Abi Stidworthy	No comment
Active Wealth Ltd	They have failed
Advantage IFA Ltd	Stop making regular changes. It is a turn off and actually creates less confidence in the industry and regulator as people think there must be something wrong for the changes to be happening again.Let the dust settle on RDR. Review it in 2022 before you make knee jerk reactions. It is here now, we have accepted it, let's give it time to see how people react.
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	That largely they have resulted in poor outcomes. The current advice landscape as already stated is expensive, it's complex to understand the nature of advice, and has resulted in the advice gap they you are now trying to address. Without being too negative look at what happened when stakeholder pensions were introduced: customers were expected to add to their pension at the supermarket checkout because it was marketed as a cheap, simple savings product. But hardly anybody did. What this tells you is that cost is not the only driver of consumer financial decisions - most importantly you have to create the desire to save and invest. You need people to understand that they need to save and not borrow, insure against death and illness, and take some risks in order to get rewarded. In conjunction with education you need advisers who are willing to deliver a mass market solution that they get adequately rewarded for, are not bogged down with compliance, and can respond to quickly.
Aspire Online	If advisers cannot earn a living from being involved in a certain sector of the market either because the fees are too low or the liability is too great the sector will not be profitable and will fail.
AXA Wealth	No response
Barra Gorman	No comment
Berkeley Burke Group (Andrew Emery)	The simple answer to the Regulators is "stop interfering" - PLEASE!! The UK financial services sector is now almost completely destroyed and what is left is fragmented beyond belief. I would strongly counsel all the decision makers in the financial services arena to utilise the wealth of experience that is available to them by creating practitioner committees that actually have some authority to act. There is experience in the authorised and regulated financial adviser community that extends to many thousands of years - use it; please!
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	The FCA may need to undertake consumer studies to understand how they think and not rely on a "mummy knows best" attitude.
Blue Scapes	No comment
BPH Wealth Management LLP	No comment
Brighton Financial Ltd	Engagement with financial services is intimidating for a lot of consumers. Pensionwise seems to have been a success but we are sure is expensive. Consumer focused movements such as those led by Martin Lewis really connect with consumers. Consumers need to see the value that can be gained from financial services and that is a tough message to communicate.
Broad Wealth Management Ltd	No comment
Browning Financial Planning Ltd	RDR did not work. FSCS in its current form is unworkable. i have never had one upheld complaint in 22 years but still pay a fortune in FSCS levies and PI insurance.
Caleb Roberts Financial Management Ltd	They haven't worked. Consumers need to know what's in it for them.
Caledonian Financial Management Ltd	No comment
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	The RDR was a positive step towards professionalism of the regulated advice market and banning of commissions. This probably exacerbated the advice gap problem, but from looking at the international comparisons in the FAMR CfI Oct 2015 document we would appear to be fairly aligned already. Increasing professionalism further (to minimum Level 6) in the regulated advice market could help build trust and confidence.

Respondent	Q26: What can be learned from previous initiatives to improve consumer engagement with financial services?
Chattertons	It needs to be simpler. An adviser should be independent of bias and an appropriately qualified individual. If people want a simple solution they should go to the bank to see their broker...
Citygate Consulting Limited	Clients are not overly pleased about paying for it. Clients didn't mind commission. Advisers should be trusted to give professional ADVICE rather than sell whatever they can. I know there will be exceptions, but I don't know many advisers that sold products clients didn't need.
Close Brothers Asset Management	No comment
Combined financial Strategies ltd	The FSA was meant to promote the financial industry as well as regulate it. Even though they seemed to. However, this seems to have been rubbed out entirely in the FCAs duties.
Cranbourne Financial LLP	No comment
D Shearer	No comment
Dean Robertson	no comment
Douglas Baillie Ltd	For the Regulators and the Treasury to engage a lot more directly with experienced financial advsers and to recognise that our front line exposure to consumers is invaluable. I have extensive previous experiences of trying to achieve this, but was frustrated because the Regulator clearly had no understanding of the deeply technical issues involved - particularly with a plethora of diffeing and cnflicting pension regimes. Regulators and the FOS need to employ pension specialists who have taken the same examinations and FCA permissions as the advisers they are regulating!
Entrust Financial Planners Ltd	No comment
Essential IFA	No comment
Esteem Money Ltd	The current Workplace pensions TV campaign is a great example of getting it wrong, whereas the previous adverts were very good. Pensions Freedom is another great example of politicians getting it wrong, and forcing changes without understanding the problems that everyone would have. The consumer was not at the heart of these changes, the Treasury was.
Financial Foresight (NI) Ltd	The clarity of the FIMBRA/LAUTRO regime (polarising tied and independent) may be an easier message to promote engagement.
Forward Plan IFA Ltd	It's not worked so a total rethink is requiredIt's not worked so a total rethink is required. Consumers in general have poor financial knowledge and can be scared of dealing with money. even the wealthy
Halebarns Financial Planning Ltd	It regulators work on a tick box approach to regulation, nothing will improve.
Hall Financial Planning LLP	the FCA / FSA have focused on charges and fees. although Commission may have in the past been abused, it did allow advisers to receive payments for advice while effectively spread the cost of advice to the consumer. Factoring in savings products for example regular contribution pensions should be reintroduced.
Highclere Financial Services	The RDR has proved a resounding flop. As many predicted, the dismal consequences far outweighed any advantages that greater transparency and higher qualifications provided. Thousands of good quality advisers were forced out of the industry, calls for flexibility by advisers and the TSC were ignored. The removal of commission created an additional barrier to sales/purchases. The financial world is not a better place for consumers as they are more confused than ever before. The lesson to be learned is that theorists should take heed of the wiser counsel of practitioners. The should listen more and pay less heed to the blind squawking of consumer bodies which like most cynics understand the price but not the value.
Intelligent Pensions	In our view where finalised guidance is published (as in FG15/1) it's essential that the key points be pro-actively publicised by the regulator to the relevant parties i.e. consumers and advisers, otherwise the guidance doesn't achieve its objective. I don't think consumers have any understanding of simplified or focused advice and many advisers are unaware or distrustful.

Respondent	Q26: What can be learned from previous initiatives to improve consumer engagement with financial services?
Investec Wealth & Investment	Despite significant marketing campaigns in relation to, e.g. CAT standard ISAs and stakeholder products the take-up on the whole was as identified disappointing. However straightforward and transparent the products were, people always found something better/more pressing to do with their money. This returns again to the adage that financial products are sold and not bought and many consumers are not sufficiently interested to engage even at a basic level. In addition there is still the issue of the lack of trust in the financial services industry and the frequent regulatory changes (aimed at consumer protection) which continue to leave people disengaged. Furthermore, as identified the margins for providers, especially for those with a traditional infrastructure with conventional distribution channels are so tight that the volumes required to make them profitable were unrealistically large.
Iwan Jones	They did not work so no point in using them again
James Hay Partnership (Janet Morville-Smith)	Previous initiatives, such as the now defunct Stakeholder pensions, have largely focussed on cost and with RDR the focus was on the way advisers are remunerated. Neither paid enough attention to the value of the advice being given. New initiatives are now dealing with the way that platforms are paid. In many respects, these have had the unintentional consequence of creating the advice gap we face today. As many advisers who no longer receive commission from low premium regular savings products have stopped offering advice to that customer segment. The requirement to pay a fee for services that may benefit the customer in the distant future is also challenging. Accountancy and legal services, where a fee is also paid, provide a more immediate benefit, which plays better to human nature for rewards now, rather than later. Because of the lack of financial literacy there is no appreciation of the value of good financial advice so advice is invariably going to seem like an expense rather than a necessity. Regrettably, a previous initiative to include financial services within the school curriculum was not followed through. Education needs to play a major role in bridging the advice gap and promoting greater engagement.
John Lord	No comment
Jonathan Davis Wealth Management LTD	No comment
Joslin Rhodes Lifestyle Financial Planning	Obsession with low cost does not work. Stakeholder. CAT Standard. Focus the message on the tangible benefits of advice (hint - its not about investment returns or tax, its about life and peace of mind)
Katy Master	No comment
Lemonade LLP	That interactive tool and information laden websites are not enough to increase consumers engagement with financial services.
Lighthouse Financial Advice	No comment
Morgan Financial Ltd	Stop telling consumers that they can get advice for free via the money advice service. Encourage consumers to seek advice. Become a regulator that yes consumers should be proud of (although most don't realise the importance of the FCA and the protection it affords them). Also become a regulator that financial service firm can also be proud to be regulated by.
Morgans Ltd	It is clear that we need a way of triggering consumers to take advice and then engage with product providers. Alternatively we need to take an auto-enrolment approach where consumers are automatically enrolled in to schemes that provide life assurance, income protection, saving.
Openwork Limited	There is a public policy responsibility to sponsor the benefits of financial advice, a further levy on the industry would not be welcomed given the greatest detachment is in those segments least likely to engage with the advice industry.
Park View FP Ltd	I feel that their is a lack of respect over many years between advisers and the various regulatory bodies. Moving forward we need to work as partners not as 'enemies' as surely this will lead to much better consumer outcomes which we all want. A start would be for the FCA to actually praise the good work the vast majority of firms deliver. It feels like the only time we hear from the FCA is when something ahs gone wrong. Surely a much more positive PR campaign on the value of seeking professional advice and the huge benefits it brings would be a good start. And also more proactive communication with advice firms could really help with regular forums and meetings etc.
PCM Asset Management Ltd	No comment
Penguin	no comment
Polygon Financial Ltd	Failed.

Respondent	Q26: What can be learned from previous initiatives to improve consumer engagement with financial services?
Profile Financial Solutions	No comment
Prosperity Wealth Management Limited	Too much change, too often leads to consumer disengagement and confusion.
Protection & Investment Ltd	Certain consumers, those you are focussing on in this review and those where the advice gap is most acute, dont necessarily seek advice perhaps as they have not realised they have a need or are not willing to pay for it. Some people need to be sold to. Basic economics means that it needs to be profitable for any business to survive. Unfortunately, previous initiatives, such as CAT or stakeholder, have not been profitable for providers, distributers or advisers (under a commission regime). Following RDR, it is not economic for advisers to service this segment of consumers on a fee basis as they are either not willing to pay for advice upfront or the scale of their assets makes it uneconomic. There needs to be a realisation that sometimes, something is better than nothing, for those who cant or wont pay for full advice. Regulation needs to provide the opportunity for firms to offer a simplified advice service which is simple, cost-effective for the client, profitable for the firm and has a reduced regulatory requirement/cost. Such advice/products would also need to allow consumers to spread the cost of advice via some form of limited customer agreed remuneration option and allow providers to offer factoring, so that it can be profitable for advisers/sellers/distributers.
Richmond House Group	Nothing. The private sector is perfectly capable of maximising consumer engagement and filling the advice gap if left alone to do so. The burden of regulation is the sole barrier to this.
Rob Coote	Don't know
Rowley Goodall Ltd	No comment
Royal Mail	As highlighted above, the initiatives undertaken by consumer groups in both France (French Consumers Organisations 60 millions de consommateurs Institut national de la consummation) and Austria (led by the Austrian Post) have had a positive impact in informing consumers and empowering them in their engagement with those providing financial advice and related services. With this in mind, the Keep Me Posted campaign would recommend that the FCA give thought to the outcomes of these campaigns and how they might be translated into the regulatory framework surrounding the provision of financial advice in the UK.
Simplified Money Ltd	The best initiative to engage people with Financial Services was Pensions Freedom because they have started to realise what they don???t know and the importance of getting decisions right. Before that, it was selling British Gas shares. I do not think MAS has been a huge success in this regard and, with my marketing head on, think there is a lot more that could be done to educate people on the subject in a far more entertaining way.
SK Financial	Better communication
South West Financial Planning	Remove some of the excessing regulatory barriers. Allow consumers to be partly responsible for their actions. They can and do make illogical choices, but it is their choice. Create safe harbours of advice.
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	Speak to th firms running their day to day businesses and understand how we add value to clients where the state offers no help or support
Sussex Independent Financial Advisers Ltd	No comment
Swallow Financial Management LLP	Start again, because what has gone before has badly failed its created confusion, confusion & more confusion with a lot of closures. Which in turn has caused " continued customer detriment" as opposed to the "anticipated good customer outcome" The public have to wait weeks/months for lenders appointments, institutions can not advise clients on their own policies/products (ludicrous) . They have to put their hand in their pockets for advice in every area having had if free/subsidised by trail commission.
Taurus Global Financial Advisers Ltd	MAS is an abject failure and another quango which should be shut down now.
The Minster Partnership llp	I do not know

Respondent	Q26: What can be learned from previous initiatives to improve consumer engagement with financial services?
Tom Orchard (Annetts & Orchard)	Very little, it makes no difference and just adds to the complication. CAT, Stakeholder were all massive flops as it was known by the quality advisers to be a compromise solution, usually only slightly cheaper but always giving up other benefits elsewhere. The RU64 rule is one of the most ridiculous rules and added burden that emphasise this point. Removing that today would save millions of lines of pointless typing in suitability reports across the country in one sweep of the FCAs pen. If anything, previous initiatives in the UK serve as a warning how a regulator should not conduct itself or interfere with the market. The regulator should simply be more helpful and less wishy-washy with process. They should also define simple products (by size of contributions or premiums and by caps on fee earnings). Then they should guarantee this will remain in place forever, with no retrospective action (with the suitable caveats and warnings so no client is ever in doubt what they have). I think a new fee agreement signed every two years is acceptable, we already do something similar (but more robust). But how would that help the advice gap, the argument seems to have moved into creating more paperwork very quickly! Annual fee disclosures would do the same and add another level of complexity and paperwork for the adviser firm, something else to trip up on. Also, once more the regulator shows its obsession with cost over value.
True Potential Wealth Management	Pensionwise does not seem to have been a success, it only offers guidance, not enough money set aside for seeing your local financial advisers FCA could use some of the fines that have been implemented recently to advertising campaign for potential clients to see there local financial advisers and tell them about the changes in advice and how advisers could be more trusted due to RDR. Instead we give the money to the treasury and increase costs to advisers/firms which only results in more charges and the advice gap growing bigger.
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	That they have failed to have the desired outcome to improve engagement
Wishart Wealth Management Ltd	Can't say I am aware of any previous FCA/FSA/PIA initiatives to improve consumer engagement with financial services. I have seen adverts from their FSCS encouraging consumers to actively sue their insurer/adviser - but that is hardly going to improve consumer engagement. Can't think of any other UK industry/sector that actively promotes 'pot shots' at itself. IFP have tried Financial Planning week each November with some success. Public still don't get the important differences between real planning, financial advice and financial products.

Respondent	Q27: Are there any approaches to the regulation of advice in other jurisdictions from which we could learn?
2plan wealth management Ltd (Chris Smallwood)	n/a
Abi Stidworthy	No comment
Active Wealth Ltd	Not considered
Advantage IFA Ltd	I don't think any of them have it right. It would have been useful to see a comparison of the average costs of advice in different areas for each of these countries before drawing any judgement as to their effectiveness.
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	No comment
Aspire Online	No comment
AXA Wealth	No response
Barra Gorman	No comment
Berkeley Burke Group (Andrew Emery)	I do not feel qualified to pass comment on this question.
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	No comment
Blue Scapes	No comment
BPH Wealth Management LLP	No comment
Brighton Financial Ltd	Don't know.
Broad Wealth Management Ltd	No comment
Browning Financial Planning Ltd	no comment
Caleb Roberts Financial Management Ltd	Don't know
Caledonian Financial Management Ltd	No comment
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	No comment.
Chattertons	I think, actually, the UK has one of the best regulatory regimes in the world. I like being heavily regulated and we take some pride in the same. We do not want our status cheapened by relaxed regulation.
Citygate Consulting Limited	Jurisdictions where commission is still used on ALL products.
Close Brothers Asset Management	No comment
Combined financial Strategies ltd	No opinion
Cranbourne Financial LLP	No comment
D Shearer	Check with Citizens Advice!
Dean Robertson	no comment
Douglas Baillie Ltd	Yes: a very good example, where i have personal experience, is the UK Civil Aviation Authority (CAA), where aircraft operators, their crews and engineers and Air Traffic Controllers (ATC) are all governed by The Air Navigation Order (ANO) and have to submit actual opertaions manuals for aproval before and during all air operatons. It is also customary for a pilot or other CAA licencesd person to be able to contact the CAA directly and discuss operational and other practical difficulties with an ex-pilot or ex-ATC officer who actually understand the issues, and can resolve them. this is domne on the basis of a 'no blame' culture,and is a massive contributor to flight safety. I take my advisor responsibilities no different to when I was the Captain and Commander of a public transport aircraft, and if the FCA would like to know more about this, then please ask me.
Entrust Financial Planners Ltd	No comment
Essential IFA	No comment
Esteem Money Ltd	Don't know
Financial Foresight (NI) Ltd	Not aware of any.
Forward Plan IFA Ltd	No comment
Halebarns Financial Planning Ltd	Don't know. Possible Australia from what I hear.

Respondent	Q27: Are there any approaches to the regulation of advice in other jurisdictions from which we could learn?
Hall Financial Planning LLP	No comment
Highclere Financial Services	Self-regulation works in most areas. Additionally, most areas not suffer the privations of an omnipotent ombudsman service.
Intelligent Pensions	Unable to comment
Investec Wealth & Investment	No comment
Iwan Jones	No comment
James Hay Partnership (Janet Morville-Smith)	The Australian market offers an insight into how to collate useful information in an easily accessible and digestible form, whereby an individuals various savings products are more easily collated thanks to the requirement for an industry-standard identifying code, such as the NI number. And the USs equal responsibility measures, where the person receiving the advice must also take responsibility for ensuring that they understand whats being proposed, would be a step in the right direction. In all the material covered to-date, weve seen little or no discussion about ways of verifying the individual consumers actual understanding of the information provided and that needs to be addressed.
John Lord	no comment
Jonathan Davis Wealth Management LTD	No comment
Joslin Rhodes Lifestyle Financial Planning	No comment
Katy Master	No comment
Lemonade LLP	Not known
Lighthouse Financial Advice	no experience
Morgan Financial Ltd	Don't know
Morgans Ltd	No comment
Openwork Limited	We have no particular comment to make on this point.
Park View FP Ltd	Unsure
PCM Asset Management Ltd	No comment
Penguin	no comment to offer
Polygon Financial Ltd	No. See answer 25.
Profile Financial Solutions	No comment
Prosperity Wealth Management Limited	No comment
Protection & Investment Ltd	The US market has a significantly more practical approach whereby consumers have multiple routes to product purchases, notably a significant direct to consumer offering and brokers who are able to provide a limited form of advice suitable, not necessarily whole of market, holistic. Our understanding of trends in the US market, is that many consumers are happy to do it themselves or get limited sales-based advice up to a certain level of assets (this used to be $50,000-$75,000) at which point many then want to take advice on a fuller, more holistic best advice basis.
Richmond House Group	No view.
Rob Coote	Unknown
Rowley Goodall Ltd	No comment
Royal Mail	This is not a topic on which the Keep Me Posted campaign is able to provide a response.
Simplified Money Ltd	No comment
SK Financial	Australia and New Zealand are two countries regularly mentioned as being more advanced than us in the advice market place. I have no researched this thoroughly to offer an analytical opinion.
South West Financial Planning	I do not know

Respondent	Q27: Are there any approaches to the regulation of advice in other jurisdictions from which we could learn?
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	no comment
Sussex Independent Financial Advisers Ltd	No comment
Swallow Financial Management LLP	No idea.
Taurus Global Financial Advisers Ltd	Unknown.
The Minster Partnership llp	no
Tom Orchard (Annetts & Orchard)	Their low, low compliance costs, direct and indirect.
True Potential Wealth Management	No comment
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	Don't know
Wishart Wealth Management Ltd	Possibly. There should be a choice of regulatory body that creates healthy competition and forces the current regulator to be answerable to those paying for its existence and to keep their annual costs down to inflationary (CPI) rises only.

Respondent	Q28: What steps can be taken to address behavioural biases that limit consumer engagement without face-to-face advice?
2plan wealth management Ltd (Chris Smallwood)	Consumers will buy simple safe harbour style products if they are freely available and the processes are simple and the costs are fair, low cost and efficient
Abi Stidworthy	No comment
Active Wealth Ltd	Education!
Advantage IFA Ltd	I don't know.
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	No comment
Aspire Online	In my humble opinion unless the individual is already a client of the firm it is really hard to engage a client without some sort of face to face (live or maybe skype).
AXA Wealth	In our response to question 9 we listed some of the consumer biases that limit or stop consumer engagement. Additionally, the ongoing education of consumers is becoming increasingly important. Education through a number of avenues should be considered, for example. Schools & colleges currently provide assistance and guidance with regard to future careers and same could be done with basic financial information. Employers can often provide a trusted source of information for employees. Government backed service providers such as Citizens Advice Bureau and Pension Wise.
Barra Gorman	No comment
Berkeley Burke Group (Andrew Emery)	Undertake the programme of re-education of the general public so that they understand that UK financial services is a <very> complex area that usually requires many years of structured studying accompanied by a huge slice of common-sense. Educate the consumer to accept responsibility for their own decisions and instruct the FOS/FSCS etc. to accept that as a maxim too. This is likely to take quite some time to address and results may get worse initially before they get better.
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	No comment
Blue Scapes	Please, keep the face-to-face advice facility.
BPH Wealth Management LLP	No comment
Brighton Financial Ltd	I don't know.
Broad Wealth Management Ltd	No comment
Browning Financial Planning Ltd	No comment
Caleb Roberts Financial Management Ltd	Advertising via various mediums, eg. Facebook, Twitter
Caledonian Financial Management Ltd	there needs to be separate rules that cover advice if it does not involve the client speaking with the adviser. How can an adviser provide advice to a client they have never met?
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	Help to promote the benefits of regulated financial advice and build trust and confidence in the industry.
Chattertons	Human behaviour is something to be worked with, rather than against. Previous regimes have attempted to get people to challenge perceived societal norms, whereas the emphasis should be on identifying weaknesses in human behaviour and using psychological nudges to ensure that their behaviour is as logical as possible.
Citygate Consulting Limited	As the internet generation matures this problem will fade a little, but I still think you should see the person face to face if they manage large amounts of your money and ultimately provide someone with information to assist decision making on their entire wealth and aspirational goals.
Close Brothers Asset Management	na
Combined financial Strategies ltd	Nothing that is why they are "behavioural biases". Solve the exiting ones and new ones will emerge.
Cranbourne Financial LLP	No comment
D Shearer	Simple publicity materials and something that allows people to see that advice is important and (supported software) methods to make it possible for normal people.
Dean Robertson	no comment
Douglas Baillie Ltd	Information and Communication of the need and value of taking advice that can be delivered properly via the internet.
Entrust Financial Planners Ltd	No comment

Respondent	Q28: What steps can be taken to address behavioural biases that limit consumer engagement without face-to-face advice?
Essential IFA	I do believe that online providers should be forced to prominently display on the front page of their websites the way their remuneration is received e.g. sponsored links or articles so that the consumer can understand that this is not an independent point of view.
Esteem Money Ltd	Face-to-face is the only way as far as I am concerned so prefer not to answer
Financial Foresight (NI) Ltd	Face to face should be encouraged - create an environment to encourage new entrants.
Forward Plan IFA Ltd	none - if you are advising on money matters, then trust is important and the only way to get this is by meeting face to face.
Halebarns Financial Planning Ltd	Don't know.
Hall Financial Planning LLP	No comment
Highclere Financial Services	The undersell cry for consumer empowerment through greater education falls at the apathy hurdle. As a society we seek to encourage people to believe that somebody else will sort out their problems and it cannot continue. Many of the cost problems of the NHS and pension provision would be reduced or even wiped out of sufficient consumers took steps to protect themselves sufficiently and started saving for retirement at n early age. Financially there is no incentive for advisers to seek out pension clients. There was years ago when in-built commissions rewarded advisers for their prospecting efforts. Learn from the past.
Intelligent Pensions	I don't think education or other forms of generic support will achieve much on their own. Employee Benefit Consultants have been trying to improve member engagement in the DC client schemes for years and with very limited success. The key must be to get the light touch advice model to work, and indeed to encourage this as an online advisory service which can therefore be delivered with better efficiency and economies of scale and therefore at lower cost to consumers.
Investec Wealth & Investment	no comment
Iwan Jones	Lack of trust and the fear of scams
James Hay Partnership (Janet Morville-Smith)	no comment
John Lord	no comment
Jonathan Davis Wealth Management LTD	No comment
Joslin Rhodes Lifestyle Financial Planning	no comment
Katy Master	Face-to-face advice is what I want.
Lemonade LLP	Financial education in the workplace or 'gamification' of advice
Lighthouse Financial Advice	nothing without spending money that could be spent on advice!
Morgan Financial Ltd	For goodness sake stop letting these payday loans advertise on television acting like they are the consumer's best friend. This is something that the FCA must stop. People associate these rip off lenders with other aspects of financial advice. People are too easily swayed through behavioural bias.
Morgans Ltd	In recent years we have seen the growth of telephone and on-line services in the general insurance sector (and a variety of other industries). We need to understand the issues that these have presented to consumers and use this knowledge to help shape any propositions in the regulated advice sector.
Openwork Limited	Consumers will buy simple safe harbour style products if they are freely available, clearly explained, the processes are simple and the costs are fair, low cost and efficient. Clearly there is a co-dependency on successful marketing to ensure potential customers are engaged and encouraged to pursue this route.
Park View FP Ltd	As above just being more positive on the need and value of advice. We hear huge campaigns reassuring clients if their investment fails but never any campaigns on the need for advice !
PCM Asset Management Ltd	don't know
Penguin	help promote phone and internet based advice by providing a quality mark for businesses that is easier to access. The ISO/BS and various chartered and accredited firm offerings from the various bodies in the profession are very expensive and are not focused on providing advice to the mass market. We need to find a way to give people confident and trust in these business models
Polygon Financial Ltd	Limit it.
Profile Financial Solutions	Make greater use of the telephone - less intimidating and more cost effective
Prosperity Wealth Management Limited	Very little. Consumer engagement is vital at times when behavioural biases are at their extremes.
Protection & Investment Ltd	No comment

Respondent	Q28: What steps can be taken to address behavioural biases that limit consumer engagement without face-to-face advice?
Richmond House Group	Simplified advice is not viable when it is unclear as to whether the FOS will recognise this.
Rob Coote	Education for the need for advice. If it was introduced in schools then perhaps we can encourage the future generations to view advice differently and also join the industry
Rowley Goodall Ltd	No comment
Royal Mail	The Keep Me Posted campaign is strongly in favour of ensuring that all consumers are provided with all the information required in order to make informed decisions about their financial affairs. While it is true that for many consumers the most straightforward way to receive this information is through a firms website, by email, directly through a local branch office or over the telephone, for some this is not the case. Many of those in extreme financial straits, the elderly, those living in rural communities and those who lack ICT skills are simply not able to use digital platforms as the default medium to access vital financial or administrative information. Consequently we would recommend that the FCA provides financial service providers with guidance on how this information is communicated to consumers and that this includes guaranteeing that those without easy access to digital platforms are suitably catered for. Addressing barriers to engagement in this way has the potential to directly tackle some of the behavioural biases which can limit consumers engagement with those providing financial advice. Research conducted by London Economics on behalf of the Keep Me Posted campaign indicates that how information is received, by post or electronically, can have a big impact on peoples understanding and the choices they subsequently make. This research found that people are more likely to understand information and make better financial decisions when they receive information by post, rather than electronically. For example, people were more than twice as likely to correctly identify how much money was in their account if they received the statement by post (82% compared to 32% who receive statements online). With this in mind, we feel it is essential that steps be taken to ensure that consumers retain the option to receive financial advice and related information through traditional paper hard copy.
Simplified Money Ltd	No comment
SK Financial	More consequence evidence that will show a consumer the dangers of doing something without talking advice. I think the "pension predator" campaign is a really good deterrent as its making sure that consumers do take greater care when they consider encashing their pension benefits.
South West Financial Planning	Build trust in financial advice
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	no comment
Sussex Independent Financial Advisers Ltd	no comment
Swallow Financial Management LLP	No idea.
Taurus Global Financial Advisers Ltd	Unknown.
The Minster Partnership llp	More media coverage
Tom Orchard (Annetts & Orchard)	Introduce media and education campaigns to promote the values of regulated advice. More reporting on good practice and good outcomes, less focus on poor outcomes on billboards on every street corner. Having trusted regional firms who are allowed to do different and newer thing in confidence as the regulator understands they have high ethics, a TCF culture and qualifications and skills not to abuse them.
True Potential Wealth Management	No comment
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	Don't know
Wishart Wealth Management Ltd	This is a tall task. Need to make financial advice as easy as buying a song/tune from Apple iTunes . The weight of regulation coupled with consumer inertia/ignorance are real challenges.

Respondent	Q29: To what extent might the different types of safe harbour described above help address the advice gap through the increased incentive to supply advice
2plan wealth management Ltd (Chris Smallwood)	Firms are not adopting simplified advice models principally because of concerns of how FOS would treat them in case of consumer complaints. This problem would be addressed in part by the creation of a safe harbour, but firms would need to have the confidence that FOS would follow. An independent appeal from the FOS should help restore confidence in receiving a fair hearing.
Abi Stidworthy	No comment
Active Wealth Ltd	I appreciate the incentive to provide advice but there are not enough advisers!
Advantage IFA Ltd	It is a step in the right direction but not enough in isolation. If a firm or adviser can show that it has acted in the best interests of the client at the time and that fair care and due diligence has been taken in preparing recommendations then there should be protection for firms and the adviser. The adviser presents a recommendation which the client evaluates and decides whether to take up or not. The fact that there isn't at the moment is more of a travesty of justice rather than a mere disincentive to supply advice.
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	No comment
Aspire Online	If an adviser knew that if he followed a rules based regulation to the letter which meant they could never be liable for a complaint then this could work and advice could be given. If there were any doubts why would an adviser get involved?
AXA Wealth	A safe harbour may help address identified advice gaps as it is a provision against the application of a specific rule(s). Often the key factor when deciding to embark on a new proposition is whether it is likely to lead to regulatory censure and the impact of redress, fines etc. Safe harbours may mitigate these risks and have a positive impact upon regulated firms Boards risk appetite. However, it would be subject to adherence within set criteria and isn???t a get out of jail free card. If the set criteria is too onerous or creates uncertainty the safe harbour won???t be taken up. If safe harbours are adopted it would be beneficial for good and bad practice to be shared to encourage good behaviour. However, it should be recognised that many firms will have invested a great deal of Intellectual Property into their propositions and maybe reluctant to share with competitors.
Barra Gorman	I fear this idea could be exploited by some for gain with reduced risk of redress
Berkeley Burke Group (Andrew Emery)	The "safe harbour" concept should help to reduce the advice gap although to what extent is, as yet, unknown. However, on its own it is likely to do little more than store the problems/issues until a later date. It must be part of a much wider programme to move the UK financial services consumer away from the "I won't do it" concept and more towards the "I can't do it" scenario. Without the consumer buying into the concept of "needing" advice, any incentive is likely to struggle to succeed.
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	The safe harbour by way of evidential rules, will make clear the FCA's expectations. The safe harbours would need to be specific for firms to trust them and enter that sector of the market. Lowering the levels of consumer protection, may not comply with the ADR Directive, and would not close the trust gap, and would not solve the problem.
Blue Scapes	No comment
BPH Wealth Management LLP	If the only advice which could be provided was independent, across the whole market, then by default the adviser would be acting in the client's best interests.
Brighton Financial Ltd	I don't know.
Broad Wealth Management Ltd	No comment
Browning Financial Planning Ltd	no comment
Caleb Roberts Financial Management Ltd	Technology
Caledonian Financial Management Ltd	I would assume that advisers would be more likely to work in this space if the rules were amended for this type of "advice".
Carolyn Callanan	No comment

Respondent	Q29: To what extent might the different types of safe harbour described above help address the advice gap through the increased incentive to supply advice
Chartered Financial Management (UK) Ltd	The idea of a safe harbour can only be considered credible if it will be supported by the PII insurers and protected against litigation from claims management companies, as well as FOS. This could help reduce direct and indirect regulatory costs which would enable firms to deal with some lower wealth value clients if the demand was present. The use of safe harbours should also be aligned with increased ethical professionalism to help ensure these are not exploited as a loophole.
Chattertons	No comment
Citygate Consulting Limited	If we take the fact there was less of a problem prior to RDR and the main thing that changed was the removal of commission, then re-instating this would surely solve some of the problem? I 100% agree that an on-going service should be provided, but as stated above, if a hybrid of on/off on-going trail commission existed this surely would have solved the problem? If initial commissions were capped and harmonised across providers then again, surely we would have seen less of a need to do away with commission? Surely the rise in number of platform providers shows there is a greater potential margin to be made. While I still haven't seen the fund managers reduce their fees sufficiently, when it is the adviser that provides the consultative time and incurs a lot of the on-going cost. For the large fund houses, the majority of their assets are already bought and paid for. There are fund managers earning many ??millions each year with things such as Auto Enrolment earning them even more without them actually having to do anything to obtain the extra funds under management.
Close Brothers Asset Management	No comment
Combined financial Strategies ltd	Please see my concerns regarding robo-advice.
Cranbourne Financial LLP	No comment
D Shearer	No comment
Dean Robertson	no comment
Douglas Baillie Ltd	To ensure that the Treasury, The FCA, the FOS and the FSCS are all equally engaged and do not create distances from each other in pursuit of individual outcomes, rather than as collective responsibilities. A suggestion: Create one central 'new regulatory regime' that understands these problems would be most helpful, so that advisers deal with one source, and not too many.
Entrust Financial Planners Ltd	No comment
Essential IFA	I believe that so called safe lists of products are a good idea but it does open the question of what happens if a safe harbour product or service goes bust? Who pays for the compensation?
Esteem Money Ltd	People supply advice when they trust the process, if trust is not there then the information supplied will not be good enough
Financial Foresight (NI) Ltd	Any process being followed should have frequent "escape valves" to face to face.
Forward Plan IFA Ltd	safe harbours should not exist as this does not create a level playing field for consumers or advisers.
Halebarns Financial Planning Ltd	Don't know
Hall Financial Planning LLP	No comment
Highclere Financial Services	N/A
Intelligent Pensions	We believe that the FCA should precisely specify conduct which complies with a rules and conduct which does not by giving clear guidance with worked examples. We also believe that advisers should retain liability for unsuitable advice or failure to comply with the rules i.e. this should be 'specific professional advice' as a regulated activity. If it is not a regulated activity and therefore doesn't carry a potential liability then consumers are bound to be less confident about seeking and taking advice.

Respondent	Q29: To what extent might the different types of safe harbour described above help address the advice gap through the increased incentive to supply advice
Investec Wealth & Investment	The concept of a safe harbour may in principle provide an incentive to businesses to supply advice to fill the advice gap. However, as highlighted there is fear among the industry (whether well founded or not) that retrospective action may be taken if the standards change in the future or at least that there will be further changes that will negate the appeal of operating in this market making firms unwilling (and in their view unable) to plan for the long term. If a safe harbour approach could be agreed for a set period then that might help give business confidence to plan for the longer term. In particular the tail of liability is and always will be a concern to firms and if this excludes a particular area of advice this would be seen as progress. In the case of simple products where a specified set of actions determine suitability this would be more reasonable and it could be argued if this is restricted to straightforward areas of advice then it would be easier to demonstrate that the consumer is in an informed position and therefore can assume some responsibility (caveat emptor) for the transaction. Of course, one of the reasons that face to face advice is regarded as too costly for those who fall into the advice gap is that the firm providing advice has to charge a margin for the liability and the ever growing compliance structure that is required. If there was reduced liability and therefore a need for a reduced compliance infrastructure in these businesses that are providing simplified/basic advice then on the understanding that the consumer is adequately protected, overall costs to the consumer should and could be lower.
Iwan Jones	Not sure
James Hay Partnership (Janet Morville-Smith)	no comment
John Lord	no comment
Jonathan Davis Wealth Management LTD	No comment
Joslin Rhodes Lifestyle Financial Planning	Safe Harbour means 'not really doing it properly'.
Katy Master	No comment
Lemonade LLP	They could reduce complexity, uncertainty and cost which will help encourage supply.
Lighthouse Financial Advice	No comment
Morgan Financial Ltd	Don't know. I am not sure that you describe a safe harbour above.
Morgans Ltd	No comment
Openwork Limited	It definitely helps to ring fence some safe harbour style products and sponsor them publicly, but there is one additional point that requires attention. Clients need a better understanding that they will typically be exposed to some kind of investment risk. We see certain complaints arising from customers where they allege they didn???t get back what they expected. In some of these cases we accept that there is evidence that there was not good disclosure of the inherent risks, but in others we see a rise in speculative claims with no merit ??? usually sponsored by claims management companies, branching out from their PPI activities. This is not good for the industry. The claims management industry should make a contribution towards cases not upheld by the FOS. It is also not clear how safe-harbour outcomes can be mixed with more complex advice, for customers seeking a more holistic view of their financial arrangements.
Park View FP Ltd	I Think this is fraught with risk in that some providers could try and take advantage of a safe harbour and sell bucket loads of rubbish. However if delivered correctly potentially it could work.
PCM Asset Management Ltd	Not relevant- I don't beleive there is an advice gap
Penguin	You need to support good advice businesses who are worried about one day retiring, or selling, their business for fear of future regulatory reviews or blame cultures - so a long stop needs to be introduced. A massive thing to look at would be some kind of standard PI insurance - I still find it baffling that each year you can end up with a different provider based on cost and terms - we should have one central PI policy that everyone pays to and is covered on so that there is certainty in the profession. Has to be a way to provide security around insurance - especially when someone looks to retire from their business as run off cover is massively unpredictable
Polygon Financial Ltd	Not qualfied to answer this.

Respondent	Q29: To what extent might the different types of safe harbour described above help address the advice gap through the increased incentive to supply advice
Profile Financial Solutions	In our view the regulatory framework is relatively fit for purpose in the pre-retirement, accumulation phase. The problem is regulation at the retirement, de-cumulation phases. Many consumers want to take advantage of pension freedoms to access their savings at the earliest opportunity. Most advisers would recommend NOT taking early access to pension savings. This creates an immediate conflict of interest that advisers need to bridge. This could be via a compromise position being taken (access some, leave some). Without advice a consumer might access all their savings. However, this type of position creates potential future regulatory risk for advisers. Therefore safe havens or other regulatory safeguards such as a safe prescribed process for advisers to follow could benefit in the area of de-cumulation advice. Our business avoids taking on new clients who want to access their pension savings due to the regulatory risks of advising in this situation.
Prosperity Wealth Management Limited	Although these types of safe harbours may seem to provide an opportunity to address the advice gap the danger is that unscrupulous sales people will be able to take advantage of ill informed consumers. The regulator should take steps to ensure that this cannot happen.
Protection & Investment Ltd	It would be difficult to specify certain products for a safe harbour as any product/area of advice can be simple or more complicated depending on the clients situation and scale of requirements. For example, starting a pension may seem simple but could be complicated by the clients employment status (e.g. self-employed vs limited company), earnings, contribution levels, existing provision and lifetime allowance etc). We would like to see a safe harbour provided across products at specified levels of investment/contribution/cover. This would work in a similar way to the small pot/trivial commutation. For example, investments up to a certain limit (perhaps annual ISA contributions, either monthly or single), pension contributions up to annual allowance or 500 pm, life insurance up to 500,000, small pension transfers between similar schemes (assuming no guaranteed benefits e.g. GPP to GPP, PP to PP). This could include products which allow clients to spread the cost of advice and factoring to allow distributers to conduct such business economically. It should also be allowed to be conducted on a suitable basis i.e. product should meet basic needs but doesnt have to be whole of market or best of breed.
Richmond House Group	No view
Rob Coote	Help build trust with all parties
Rowley Goodall Ltd	No comment
Royal Mail	This is not a topic on which the Keep Me Posted campaign is able to provide a response.
Simplified Money Ltd	No comment
SK Financial	It will make people think twice about making these decisions
South West Financial Planning	Allow simplified advice through safe harbours thereby reducing regulatory and PI costs ultimately benefiting consumers
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	no comment
Sussex Independent Financial Advisers Ltd	Any action that can reduce uncertainty would be welcome. If the FCA were to detail precisely what conduct complies with a rule and conduct which does not than this would remove uncertainty and would remove the fear of retrospective action being taken if standards change.
Swallow Financial Management LLP	No comment
Taurus Global Financial Advisers Ltd	No comment
The Minster Partnership llp	I do not know
Tom Orchard (Annetts & Orchard)	I think safe harbour is a very good idea, not for all firms though, only those who qualify (as mentioned above). Work closely with those firms who are progressive and interested and who will help develop new ways of better serving the needs of the consumer. Introduce de-minimis rules now (with certain parameters), that will make smaller ticket advice more attractive; it will also encourage firms to recruit new advisers with confidence, to fill this gap. Only include firms where a better consumer outcome is more likely initially (for example independent firms, chartered firms, those who are of a lower regulatory risk.

Respondent	Q29: To what extent might the different types of safe harbour described above help address the advice gap through the increased incentive to supply advice
True Potential Wealth Management	Having read the FAMR document that relates to advice to clients and looking at different locations where advice might be available and how to pay for it, why is it that it has to come from a levy to advisers/firms, we have a levy for Auto enrolment, do not start increasing costs further you will only alienate more people from advice because they cant afford it due to rising costs. Old record but use the FINES to pay for advice centres in libraries or incentivise employers to offer advice centres within there workplace using the FINE money. We the advice community should not subsidise any FCA scheme be it auto enrolment or advice centres etc.
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	Don't know
Wishart Wealth Management Ltd	It could be the case that so-called 'safe harbours' are anything but. A consumer aged 60 may live another 35 years and if a safe harbour means being invested in cash/gilts/guaranteed products they will more than likely run out of cash in their lifetime. Today's 'safe harbour' could be tomorrow's mis-selling scandal e.g. with profits. Care is required in the design of any D2C offering. Just because you build it or make it easy/cheap/free does not mean the wider public will engage.

Respondent	Q30: Which areas of the regulatory regime would benefit most from a safe harbour, and what liabilities should a safe harbour address?
2plan wealth management Ltd (Chris Smallwood)	A simplified advice model with clear guidance on the key elements of suitability could provide a solution. Advice would be framed in relation to a specific point or purpose and there would be a degree of caveat emptor. There needs to be a balance between consumer responsibility and consumer protection. In order to ensure that simplified advice is offered more widely to mainstream consumers, it could only work with a limited range of designated safer products that were suitable for a wide range of consumers. If products are generally suitable, there would be less need for a detailed fact find about the consumers circumstances. It could focus on the characteristics that would make it unsuitable for an individual. FCA could set parameters for a simplified process. Advice could then be off the peg rather than made to measure at a significantly reduced price. The needs of the great majority of people could be met by such a simplified, streamlined advice process and could expect good outcomes.
Abi Stidworthy	No comment
Active Wealth Ltd	No comment
Advantage IFA Ltd	Safe harbour should cover all regulated investments and pensions. Also should cover all cases where original client has taken advice and subsequently died but beneficiaries of estate are not happy with the deceased client's wishes.
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	No comment
Aspire Online	I believe pension provision and pension advice in the “at retirement” market
AXA Wealth	Safe harbours should not protect firms from giving unsuitable personal recommendations. This would dilute the value of the recommendation. That said a safe harbour might be appropriate for innovative alternatives such as automated advice. The key risk with automated personal recommendations is that the underlying system has a systemic flaw leading to a systemic advice issue. A safe harbour might protect a firm against systemic flaws where the firm has demonstrated appropriate due diligence & testing prior to launch. The regulator could provide confidence by being part of the testing process and confirm that it was happy for launch.
Barra Gorman	Focus should also be on unsuitable products promoted to public by unregulated & unethical individuals
Berkeley Burke Group (Andrew Emery)	Each established area of financial advice should be allowed to be addressed independently of each other. There should not be any compulsion to complete all aspects of a clients "hopes, wants, needs and aspirations" together and there should not be any way that the consumer can revert to their now infamous comment of "I didn't understand what I was signing for - now pay me some compensation" rhetoric. Individual areas for "safe harbour" might be: * Pensions * Investments/Savings * Life Insurance/Health Insurance * Mortgages * Business Insurances
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	They would need to concentrate on quality of advice, and issues which generate FOS claims. The behaviour expected when doing a fact find and assessing a client's attitude to risk are examples of what firms will want to ensure that they do not risk FOS claims.
Blue Scapes	No comment
BPH Wealth Management LLP	No comment
Brighton Financial Ltd	I don't know.
Broad Wealth Management Ltd	No comment
Browning Financial Planning Ltd	no comment
Caleb Roberts Financial Management Ltd	Regular savings
Caledonian Financial Management Ltd	No comment
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	Guidance without a personal recommendation, with limited liability if client acts on the guidance.

Respondent	Q30: Which areas of the regulatory regime would benefit most from a safe harbour, and what liabilities should a safe harbour address?
Chattertons	No comment
Citygate Consulting Limited	Pension transfers shouldn't be as arduous or deemed as high risk where we are looking at PP to PP. If there are NO safeguarded benefits and it is a simple move to a platform to benefit from greater number of funds and greater ability to manage a portfolio using modern tech, then it shouldn't require a 10+ page suitability report and it should be easier for an adviser to gather clients.
Close Brothers Asset Management	No comment
Combined financial Strategies ltd	No comment
Cranbourne Financial LLP	No comment
D Shearer	No comment
Dean Robertson	no comment
Douglas Baillie Ltd	All that is needed her is a set of clear, unambiguous rules that advisers can understand and follow. Engaging with experienced and suitably qualified and FCA regulated advisers well in advance in a real attempt to better understand the issues would be an essential pre-requisite.
Entrust Financial Planners Ltd	No comment
Essential IFA	Savings and investments could benefit from a safe harbour approach for clients who are looking to save smaller amounts of money and want to have either guarantees or assurances of capital adequacy
Esteem Money Ltd	Why dumb down advice when we are now more qualified than ever. This does not make sense
Financial Foresight (NI) Ltd	Only simpler products such as mortgage and protection.
Forward Plan IFA Ltd	safe harbours should not exist as this does not create a level playing field for consumers or advisers.
Halebarns Financial Planning Ltd	Don't know
Hall Financial Planning LLP	No comment
Highclere Financial Services	N/A
Intelligent Pensions	Simplified and focused advice (although we feel these should both be described as 'specific professional advice in relation to ...).
Investec Wealth & Investment	The areas of activity that could be included within the safe harbour approach are basic pension contributions (up to a monetary limit) e.g. stakeholder ??3,600 per annum, ISA investments, cash savings and simple life assurance (again up to a certain amount of premium). One of the important facets of face to face advice is the provision of ongoing advice. This is to ensure that consumers are kept updated with the various and frequent changes in legislation, and how they may affect them and what subsequent changes they may need to make to their arrangements. This could in itself present a barrier to entry in the financial advice market because companies are unwilling or unable to commit to the long term ongoing advice required and by the same token if basic advice, under a safe harbour, were being considered then there would not be the opportunity for ongoing advice to update clients of the impact of any change in legislation. The fact that there isnt a longstop in place here would also deter companies in this regard.
Iwan Jones	Not sure
James Hay Partnership (Janet Morville-Smith)	No comment
John Lord	no comment
Jonathan Davis Wealth Management LTD	No comment
Joslin Rhodes Lifestyle Financial Planning	A safe harbour should only be used in relation to automated "advice". To protect the adviser who didn't actually provide advice as it was an automated process.
Katy Master	No comment
Lemonade LLP	Pension freedoms should be addressed as many advisors avoid involvement in this market. The liability of future compensation if certain measures are addressed
Lighthouse Financial Advice	No comment
Morgan Financial Ltd	Don't know.

Respondent	Q30: Which areas of the regulatory regime would benefit most from a safe harbour, and what liabilities should a safe harbour address?
Morgans Ltd	No comment
Openwork Limited	We have no particular comment to make on this point.
Park View FP Ltd	low cost end of the market as long as the professional firms who do not enter into this arrangement do not still become liable if all goes wrong. The other danger is we continue to dampen down the need for quality advice in most circumstances.
PCM Asset Management Ltd	FSCS
Penguin	as above - a universal PI insurance product
Polygon Financial Ltd	Default State sponsored solutions.
Profile Financial Solutions	See answer to Q29.
Prosperity Wealth Management Limited	See above comments.
Protection & Investment Ltd	In order for this to work, firms would need to be protected from certain liabilities: Liability only for advice given/product sold, not anything else relating to clients situation. Limited long-stop e.g. 5 years Protection from complaints relating to investment performance, assuming ATR has been defined and agreed, or corporate failure. Agreed and limited potential liability should complaint be upheld this can be pre-determined if safe harbour based on maximum contributions/investment/cover. Protection from changes to legislation, product developments (e.g. X could have been better than Y) and ongoing suitability, unless specifically agreed.
Richmond House Group	Long term savings for the young
Rob Coote	Don't know
Rowley Goodall Ltd	No comment
Royal Mail	This is not a topic on which the Keep Me Posted campaign is able to provide a response
Simplified Money Ltd	it could be reduced in the case of simple products where a specified set of actions to determine suitability have been taken pre-sale. I do not agree that any level of advice should be removed from liability completely but I do agree with the above and believe firms who can demonstrate a simplified and/or focused range of products should get recognition for the limited liability they are running assuming that pre-sales assessment has been done. For example, if you only offer, say, tracker funds, it is still possible to get a risk assessment wrong but the client is never going to lose more than the market. And they will not be over charged. Guaranteed bond losses and SIPP overcharging would never have been a problem for such a business and if the Regulator recognised that, their levies - and insurers premiums - could also reflect it.
SK Financial	Protecting the vulnerable
Sout West Financial Planning	Simple investment and pension products with investments suited to their risk profiles.
Strategic Investment Solutions Ltd (Chris Kilner)	There is a lot of concern in the Market about DB transfers and the impact of Insistent customers. If firms follow the FCA Guidance set out it seems to me to be sensible to include this type of business in the Safe Harbour. Consumers, Regulators (including FOS) and Professional Indemnity Insurance providers would benefit from an informed carefully set out safe harbour approach. Otherwise the industry is subject to Retrospective Regulatory decision making, Significant reputational damage of industry, client confidence/Trust Clients have got to be more responsible. What would happen if the Stock Market Crashed in 2016, would Insistent clients still be insistent? Without clear safeguards the Market is danger of falling victim to possible Amoral Client/Claim Management company behaviour. The easy option is to kick the can down the road, allow those in the market brave enough to transact the business to deal with the unintended consequences of a Government Instigated Pension Freedom right. This could all end badly without some sure footed confident action from a well-resourced competent regulator.
Strategic Solutions (Michael King)	no comment
Sussex Independent Financial Advisers Ltd	no comment
Swallow Financial Management LLP	No comment
Taurus Global Financial Advisers Ltd	No comment

Respondent	Q30: Which areas of the regulatory regime would benefit most from a safe harbour, and what liabilities should a safe harbour address?
The Minster Partnership llp	I do not know
Tom Orchard (Annetts & Orchard)	Low premium / contribution clients, start out consumers looking to build a relationship and begin to trust an adviser, at an affordable cost. Make sure no debt products are allowed in this category any more (stop the easy buyer beware debt companies crippling regular consumers with extortionate appalling products at the press of a button)
True Potential Wealth Management	No comment
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	Don't know
Wishart Wealth Management Ltd	The regulator could ease off regulation on relatively smaller sums - 10 hours of work to set up a ??50 per month investment ISA means we won't do that type of work. Hence the savings don't get made/started.

Respondent	Q31: What steps could be taken to ensure that a safe harbour includes an appropriate level of consumer protection?
2plan wealth management Ltd (Chris Smallwood)	A safe harbour would apply only to a simplified advice model and it could be limited to certain low-risk investment products or/and have maximum investment amounts. It would be beneficial for consumers who are currently unable to access advice because of the cost and who may be vulnerable to firms peddling scams or unregulated investments. It would foster consumer responsibility. The consumer would still have appropriate protection if the limits and scope of the advice were explained and made clear. This could be achieved by consumers signing a valid disclaimer or a set of terms and conditions making the limits of advice and redress crystal clear.
Abi Stidworthy	No comment
Active Wealth Ltd	Not
Advantage IFA Ltd	It should be worded that if the adviser or firm has not acted in the best interests of the client then the client benefits from safe harbour.
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	No comment
Aspire Online	Specific rules based regulation that gave the adviser confidence that regardless of who said what in so many years hence forth they could never be liable
AXA Wealth	Within its proposals for a Regulatory Sandbox (Nov 2015) the FCA proposes a number of options to safeguard consumers. The objectives of a regulatory safe harbour appear aligned with that of a regulatory sandbox. In practice, a sandbox is a form of safe harbour. The FCA favours approach 2 in that it agrees on a case by case basis the disclosure, protection and compensation appropriate to the proposed activity. AXA Wealth believes that the same approach could provide an appropriate level of protection to consumers and regulated firms alike.
Barra Gorman	Focus should also be on unsuitable products promoted to public by unregulated & unethical individuals
Berkeley Burke Group (Andrew Emery)	The "safe harbour" concept is surely designed for the protection of the advisory community and not the consumer??? If the "safe harbour" is extended to the consumer then the existing 'status-quo' will remain and no changes will be made. If the consumer is unwilling, or unable, to pay for the cost of financial advice then they should not be invited to receive "Professional" financial advice and should remain with "robo advice". Why should the consumer have any protection from a process that they do not see any value in having - or at least not enough value for them to actually pay for it!
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	The evidential rules could be used to help FOS assess whether there was a need to make an award against a firm.
Blue Scapes	No comment
BPH Wealth Management LLP	No comment
Brighton Financial Ltd	To make things much clearer for consumers. As we have mentioned, many consumers find financial services intimidating. Clearly outlining their protection would help to build reassurance.
Broad Wealth Management Ltd	No comment
Browning Financial Planning Ltd	no comment
Caleb Roberts Financial Management Ltd	Review after 1 year
Caledonian Financial Management Ltd	It is of the utmost importance that the rules ensure the highest levels of consumer protection that can be given based on the fact that the client is "doing it themselves".
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	Consumer protection should remain as it is, with the safe harbour terminology etc left as an internal regulatory tool (if applicable).
Chattertons	No comment
Citygate Consulting Limited	I am not entirely convinced that a "safe harbour" is the right thing to do. Everything should be advised on correctly and there shouldn't really be an area that falls into a blind spot from the regulator.
Close Brothers Asset Management	No comment
Combined financial Strategies ltd	No comment
Cranbourne Financial LLP	No comment
D Shearer	No comment
Dean Robertson	no comment

Respondent	Q31: What steps could be taken to ensure that a safe harbour includes an appropriate level of consumer protection?
Douglas Baillie Ltd	By having a standard, pre-approved set of statutory 'terms and conditions' that bind the adviser and the consumer. I believe that a similar set of such rules/documentation might exist within the debt counselling department within the MAS
Entrust Financial Planners Ltd	No comment
Essential IFA	NA
Esteem Money Ltd	I would not
Financial Foresight (NI) Ltd	No ideas.
Forward Plan IFA Ltd	safe harbours should not exist as this does not create a level playing field for consumers or advisers.
Halebarns Financial Planning Ltd	Don't know
Hall Financial Planning LLP	No comment
Highclere Financial Services	N/A
Intelligent Pensions	As indicated in Q29 the 'safe harbour' should be no more than clear and unambiguous guidance along with a clear statement from FOS about how it will interpret cases e.g. the example given in the guidance.
Investec Wealth & Investment	If the safe harbour is reached via decision trees/flow charts and jargon free transparent information then the consumer will be protected insofar as the decision they have made is a simple and obvious one and reassurance is provided that they will not be blown off course by further changes in legislation
Iwan Jones	Not sure
James Hay Partnership (Janet Morville-Smith)	No comment
John Lord	No comment
Jonathan Davis Wealth Management LTD	No comment
Joslin Rhodes Lifestyle Financial Planning	No comment
Katy Master	No comment
Lemonade LLP	Clear, concise and easy to apply minimum standards
Lighthouse Financial Advice	No comment
Morgan Financial Ltd	don't know
Morgans Ltd	No comment
Openwork Limited	We have no particular comment to make on this point.
Park View FP Ltd	This is the problem I don't have the answer....but surely this also applies to advice firms...what protection have they got if it goes wrong?
PCM Asset Management Ltd	Ban Regulated advisers from advising or arranging UCITS, and take them out of the FSCS regime. FCA should take some real action towards making it difficult for Directors / Advisers Phoenixing, firms, dumping liabilities on the FSCS, by bringing in a rule that when a firm defaults, the people performing controlled functions at the firm are not allowed to perform that function for a period of 6 months.
Penguin	no comment
Polygon Financial Ltd	Think NS&I.
Profile Financial Solutions	No comment
Prosperity Wealth Management Limited	We do not believe that advisers who have their clients best interests at the centre of their proposition feel the need to have safe harbours. it is only those companies, perhaps with a history of complaints that would seek such a safety net
Protection & Investment Ltd	No comment
Richmond House Group	If it is considered appropriate to have a safe harbour then the reduced regulatory burden must be accepted, with caveat emptor applying.
Rob Coote	Unknown
Rowley Goodall Ltd	No comment
Royal Mail	This is not a topic on which the Keep Me Posted campaign is able to provide a response.

Respondent	Q31: What steps could be taken to ensure that a safe harbour includes an appropriate level of consumer protection?
Simplified Money Ltd	Minimum PI cover requirement and still the ability to go to the FOS ??? but up front agreement on the guidelines both for firm and for consumer before they could deal, in a way that mutual understanding could be evidenced, giving the adviser confidence to deal and the insurers confidence to reduce costs. And maybe a retrospective refund of an advisers FOS fee when complaints were found in their favour
SK Financial	I think that the current consumer protection in place is working
South West Financial Planning	I do not know.
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	no comment
Sussex Independent Financial Advisers Ltd	No comment
Swallow Financial Management LLP	No comment
Taurus Global Financial Advisers Ltd	No comment
The Minster Partnership llp	I do not know
Tom Orchard (Annetts & Orchard)	Only award the rights to safe-harbour once a firm can demonstrate it will not abuse it. Have more events like the fantastic Positive Compliance events in place to educate advisers. Make sure the culture of the firms you allow to do this are not those who will abuse it. If it becomes a free for all and restricted by provider firms (including the banks re-entering) then this could set the marketplace back even further.
True Potential Wealth Management	No comment
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	Don't know
Wishart Wealth Management Ltd	I am not a regulator so don't know.

Respondent	Q32: Do you have evidence that absence of a longstop is leading to an advice gap?
2plan wealth management Ltd (Chris Smallwood)	n/a
Abi Stidworthy	No comment
Active Wealth Ltd	No, but having no long stop is madness!
Advantage IFA Ltd	Yes, there are certain areas of advice where I am not inclined to provide any advice.
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	We actively avoid taking on work that has the potential to create a long term liability, such as pension freedom work, even if their is a clear consumer benefit. Effectively it's not worth the liability for the level of fee that is justifiable.
Aspire Online	No I don't and I'm not sure there is
AXA Wealth	No. The absence of a longstop wasn???t a factor in AXA Wealth closing its financial advice sales force.
Barra Gorman	Less likely to take on new / unknown client due to risk they may later be encouraged to submit a complaint by CMC
Berkeley Burke Group (Andrew Emery)	The rules of the financial services sector have changed retrospectively so often that a longstop is a must. I am not aware of any other industry where you can be held liable (financially) apparently indefinitely, and where the rules are changed and compensation sought by the consumer for breaches of "guidelines" (not even rules!) that didn't apply at the time of the transaction(s) in question. This is a bizarre and ludicrous scenario and cannot possibly be allowed to continue unchecked. In summary; why would any financial adviser risk giving advice when they might be held financially liable some 20 years later, when the entire landscape has changed and we have 20 years more experience than we did at inception?
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	No comment
Blue Scapes	No comment
BPH Wealth Management LLP	Due to increased regulatory costs, firms are reluctant to invest in new technologies.
Brighton Financial Ltd	No.
Broad Wealth Management Ltd	No comment
Browning Financial Planning Ltd	No. However the perceived thought that "give any advice and you can be chased to the grave" doesn't encourage young people into the industry.
Caleb Roberts Financial Management Ltd	Yes. Because of long ago advice consumers still mistrust financial services.
Caledonian Financial Management Ltd	No
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	No.
Chattertons	No comment
Citygate Consulting Limited	This is slightly of concern to me. I am 35 and hence a long way from retirement, but I can think that many advisers have existed the industry sooner than they would do based on the complexity of new rules and fear of getting things wrong. That is probably a good thing in truth, but I think there is a concern that 20 + years on a client can claim whatever they like and disregard how they felt about life when they were younger and when the World looked different. I think it is fairly obvious when a consumer has been miss-treated, but should an adviser take that advice to the grave?
Close Brothers Asset Management	No comment
Combined financial Strategies ltd	I think along with FCA fees, FSCS Levies and Capital adequacy the unlimited risk of setting up a business will of course prohibit new start ups in the industry. As a financial adviser you would be much better off being employed and leaving all the risk with your employer.
Cranbourne Financial LLP	Which other advice profession, e.g. accountant, solicitor, carries a liability for the advice they gave to their grave? It is a big disincentive to new entrants to the industry and to investment by existing providers.
D Shearer	No comment

Respondent	Q32: Do you have evidence that absence of a longstop is leading to an advice gap?
Dean Robertson	100%. Even though much of the issue is one of perception apparently (from your own figures), it still is a hindrance to business expanding and developing and affects their decision making in engaging with new potential clients. Is it worth the lifetime risk and liability for such a small margin is often answered negatively. Your argument contradicts itself, I would say if there are so few, why wouldnt you remove it immediately not your positioning of there are so few why remove it Many of your remarks in this review have been about perception of the market, what sort of perception does being the only market in the country without a long stop give? You say longer term products, but lawyers sell longer term products and services too, poor tenancy advice on property purchase, disgraceful management of trust money, incorrect calculations of divorce settlements, all washed away after a few years not that it would matter with one of the most closed ranks of any profession anyway. Why would self-regulating lawyers get a better deal than heavily regulated financial advisers? Because they always have done and they control this country (and own the claims management firms and their cold callers). Not being treated as equally well as a lawyer or an accountant is giving ammunition to negative press and needs to be addressed. 15 years would be a start and is still a massive compromise. Unlike lawyers and accountants, good financial advisers regularly review their clients, giving far more opportunities to understand the products and services the consumer has paid for. Lawyers and accountants are transactional by nature, are unable to explain anything without the use of complicated jargon and do not give their clients regular reviews to test the competency of their recommendations.
Douglas Baillie Ltd	Yes: You only need look no further than the difficulties of adviser firms in getting Professional Indemnity insurance. I am seeing more and more exlusions and excesses in policy conditions that more or less exclude any long-stop liability on an increasing liability. The appetite of PI insurers is seriously dwindling, and if you need evidence, look no further than the number of PI insurers down from > 20 a few years ago to < 5! This in turn leads advisers to look elsewhere for revenues to pay for it, and to massively de-risk their advice and advise fewer customers. a knock on effect is that where PI is not valid or outwith the excess or exclusion, then more than likely the liability will fall on the FSCS, thereby increasing the cost of regulation and levies even more. This is a viscous circle.
Entrust Financial Planners Ltd	No comment
Essential IFA	It is clear that many advisers have either left the industry or are not expanding practices due to the lack of longstop. In no other industry do you have unlimited liability and an introduction of a 15 year longstop would give practices some certainty of controlled costs and the ability to expand. If I take on two advisers within my practice, I carry their liability for their advice for as long as my practice continues trading. This makes it both hard to sell a practice to keep continuity of service and difficult and expensive to obtain professional indemnity insurance.
Esteem Money Ltd	No
Financial Foresight (NI) Ltd	Yes in that it is the major factor putting off young people from opting for a career in advice
Forward Plan IFA Ltd	No
Halebarns Financial Planning Ltd	It will worry advisers who are trying to retire, knowing they can be pursued to their graves. So they will continue to stuff their reports with cavets o protect themselves fromretorspective action
Hall Financial Planning LLP	No comment
Highclere Financial Services	Yes, I personally know of many advisers who have left the industry due to the fear of latent complaints. Similarly I know of potential advisers who have chosen to look for employment elsewhere where the recurring fear of dubious or opportunistic complaints has deterred them. The current system ensures that the FOS is able to confront the widows of advisers purely because the widow had been introduced into the advisory business for tax purposes.
Intelligent Pensions	No.
Investec Wealth & Investment	No evidence as such but clearly the liability tail is a barrier to entry to the financial advice market particularly where margins are compressed
Iwan Jones	Not sure
James Hay Partnership (Janet Morville-Smith)	No comment

Respondent	Q32: Do you have evidence that absence of a longstop is leading to an advice gap?
John Lord	No comment
Jonathan Davis Wealth Management LTD	it's putting advisers out of business…
Joslin Rhodes Lifestyle Financial Planning	No - it is a non issue.
Katy Master	No comment
Lemonade LLP	No evidence, however logically PI insurance providers should increase and costs should decrease.
Lighthouse Financial Advice	No comment
Morgan Financial Ltd	Don't know what you mean. Remember we are not always aware of internal jargon.
Morgans Ltd	no
Openwork Limited	Networks such as ours carry responsibility for advice given within the confines of our contract with member firms and individuals; hence the longstop concept is not a contributory factor to any advice gap from our advisers perspective. We do consider that this is likely to be more of a problem for smaller, directly authorised firms who see the spectre of uncapped liability extending beyond their retirement from the industry.
Park View FP Ltd	This is a real worry to me and all firms I speak with. The claims culture we are in means that we can be hounded to our graves even if the advice we had always given was sound. To retire and then have to justiofy something we done 20 years previous is almost criminal. Criminals do serve a sentence and are then cleared to continue their lives. Advisers are treated as though they must be guilty of something and this remains forever. In law I would imagine this breaches our human rights!
PCM Asset Management Ltd	No. But is certainly leads to barriers to growth of existing firms, in terms of most firms know will not think long term, because of the uncapped liabilities
Penguin	yes - we are already, as a profession, fearful of offering advice to people accessing their pension funds for fear of the ambulance chasing companies starting to encourage complaints from those who feel they want pension funds now and then decide to blame someone else in a few years time when they are out of money!
Polygon Financial Ltd	Yes. Unfair, keeps me awake at night and inhibits what we offer.
Profile Financial Solutions	No comment
Prosperity Wealth Management Limited	No.
Protection & Investment Ltd	No comment
Richmond House Group	Successful adviser firms are targeting wealthier individuals as not only are they more profitable but they tend to be more sophisticated and therefore less likely to complain. The least wealthy know less about personal finance and therefore are more inclined to claim. A longstop would assist bridge this gap but not reduce the cost barrier.
Rob Coote	No
Rowley Goodall Ltd	No comment
Royal Mail	This is not a topic on which the Keep Me Posted campaign is able to provide a response.

Respondent	Q32: Do you have evidence that absence of a longstop is leading to an advice gap?
Simplified Money Ltd	No comment
SK Financial	No
South West Financial Planning	No - But professional indemnity insurance is increasing substantially as a result of lack of clarity of ongoing liability.
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	no comment
Sussex Independent Financial Advisers Ltd	No comment
Swallow Financial Management LLP	Look at the massive reduction in firms offering advice over the previous 10 years. Although there are other issues which have contributed to this vast reduction this issue is a key financial liability for any individual considering staying in the industry.
Taurus Global Financial Advisers Ltd	No comment
The Minster Partnership llp	no
Tom Orchard (Annetts & Orchard)	100%. Even though much of the issue is one of perception apparently (from your own figures), it still is a hindrance to business expanding and developing and affects their decision making in engaging with new potential clients. Is it worth the lifetime risk and liability for such a small margin is often answered negatively. Your argument contradicts itself, I would say if there are so few, why wouldnt you remove it immediately not your positioning of there are so few why remove it
True Potential Wealth Management	The endowment scandal puts people off seeing a financial adviser, and to some extent I can see why, prior to me being a financial adviser and aged 19 when I first saw someone in relation to a mortgage where the "Financial adviser" at the time basically said to me sign here its an endowment mortgage and will pay your mortgage off and you should receive a lump sum on top, paperwork was already filled in no fact finding etc, terrible. The good old days of advice.
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	Given the very small number of cases that would be disallowed if there was a longstop, I do not think that the lack of one does lead to an advice gap. It does however demonstrate a lack of fairness towards advisers compared with other professions & common law
Wishart Wealth Management Ltd	Lack of a longstop is the denial of a basic human right for financial advisers. Can't see how that would stop advice being given or increase the advice gap mind you.

Respondent	Q33: Do you have evidence that the absence of a longstop has led to a competition problem in the advice market e.g. is this leading to barriers to entry and exit for advisory firms?
2plan wealth management Ltd (Chris Smallwood)	n/a
Abi Stidworthy	No comment
Active Wealth Ltd	Yes
Advantage IFA Ltd	I don't have a high enough level view to be able to comment.
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	Anecdotally, many advisers choose to wind up their firm on retirement rather than face a lifetime of litigation risk
Aspire Online	No I don't but no long stop is clearly unfair
AXA Wealth	No, AXA Wealth has no evidence that the absence of a long stop has caused barriers to firms entering the advice market.
Barra Gorman	na
Berkeley Burke Group (Andrew Emery)	Despite the FCAs insistence that there are relatively few awards by the Ombudsman made against financial advisers..relating to incidents longer than fifteen years ago, the industry arguments seem valid. Nevertheless, any resolution requires the fine balancing of client and adviser interests, which is at present, unfortunately, not in balance at all and strongly favours the consumer.
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	No comment
Blue Scapes	No comment
BPH Wealth Management LLP	The lack of a long stop is a big concern as well as restricting the ability for firms to merge and achieve benefits of scale, due to problems of open ended liability. It's against common law for the concept of a long stop not to exist, and even though financial services products can be long term, any issues with a mis-sold product would be apparent long before 15 years has passed. A big problem with not having a long stop is the fact that people's recollections of what had been stated originally are altered, due to the passage of time.
Brighton Financial Ltd	No.
Broad Wealth Management Ltd	would imagine that this could be an issue.
Browning Financial Planning Ltd	no comment
Caleb Roberts Financial Management Ltd	No comment
Caledonian Financial Management Ltd	I have no evidence, but I think the absence of a long stop is unfair.
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	No.
Chattertons	No comment
Citygate Consulting Limited	No
Close Brothers Asset Management	No comment
Combined financial Strategies ltd	Please see above. And surely it is obvious that unlimited risk will certainly cause difficulties for new firms and those looking to exit. If no one wants the risk the business can not be sold.
Cranbourne Financial LLP	No comment
D Shearer	No comment
Dean Robertson	Nothing specific. However it does seem grossly unfair. We are at the mercy of hindsight and shark firms (and clients) who think we are an easy way to make a quick buck.
Douglas Baillie Ltd	It makes PI insurance much harder to get at a much higher cost. Some well run firms are already on the brink of extinction due to regulatory and PI costs and levies.
Entrust Financial Planners Ltd	No comment

Respondent	Q33: Do you have evidence that the absence of a longstop has led to a competition problem in the advice market e.g. is this leading to barriers to entry and exit for advisory firms?
Essential IFA	I presently work through a network so that I can obtain professional indemnity insurance as the cost as a directly authorised firm would be prohibitive. This therefore restricts the number of advisers entering into the industry and also can and does restrict the saleability of practices when older advisers wish to retire. I do believe that an introduction of longstop would increase the number of advisers and also increase the saleability of adviser practices to give continuity of service to consumers. I finally believe that this will also reduce the cost of PI and ultimately to cost of advice to consumers.
Esteem Money Ltd	No
Financial Foresight (NI) Ltd	As above.
Forward Plan IFA Ltd	the long stop is inherently unfair as consumers perceptions of their circumstances of over 15 years ago will have changed. they should be aware of any issue before 15 years as they receive regular statements etc
Halebarns Financial Planning Ltd	I believe it could, though I have no specific evidence.
Hall Financial Planning LLP	No comment
Highclere Financial Services	As explained above.
Intelligent Pensions	Unable to comment.
Investec Wealth & Investment	No evidence as such but clearly the liability tail is a barrier to entry to the financial advice market particularly where margins are compressed (See above (answer to Q32)
Iwan Jones	Not sure
James Hay Partnership (Janet Morville-Smith)	No comment
John Lord	No comment
Jonathan Davis Wealth Management LTD	No comment
Joslin Rhodes Lifestyle Financial Planning	
Katy Master	No comment
Lemonade LLP	As Q32 lower PI insurance costs should make market entry easier for potential suppliers
Lighthouse Financial Advice	No comment
Morgan Financial Ltd	Don't know
Morgans Ltd	No
Openwork Limited	Similar to the point made in Q32, its likely that the absence of a longstop has driven some advisers to seek shelter under the umbrella of provider firms, nationals or networks. For sole traders or SME businesses we believe this is a potential barrier as evidenced by the increasing difficulty in securing PI cover sufficient to allow for compliant trading. The contraction in this market is also affecting larger firms, including ours, who are seeing a clear pattern of insurers withdrawing (e.g. QBE), exponentially rising premiums and higher excess exclusions. More generally, as opposed to just the absence of a longstop, we consider that advice liability in overall terms does contribute to the advice gap. Advisers (including potential new entrants) are likely to be dissuaded by new interpretations being applied retrospectively and an increasingly litigious environment that many feel is weighted unfairly in favour of the consumer lobby based on recent rulings.
Park View FP Ltd	This does stop firms entering the market place and it also stops firms MA activity due to the fear of an open ended liability.
PCM Asset Management Ltd	see 32
Penguin	no evidence but it is common sense - why would you buy a business and its liabilities given the way we have judged advice with hindsight
Polygon Financial Ltd	Yes. We would avoid certian products driving clients to risk taking alternatives. I.e Perhaps an overly cautious bias.
Profile Financial Solutions	No comment
Prosperity Wealth Management Limited	No.

Respondent	Q33: Do you have evidence that the absence of a longstop has led to a competition problem in the advice market e.g. is this leading to barriers to entry and exit for advisory firms?
Protection & Investment Ltd	No, but we would make the following points to questions 32 and 33: Lifetime, unlimited liability is clearly a barrier to entry for anyone thinking of providing advice, whether that is a large firm or a single practitioner. Along with other aspects, the lack of a long-stop has, and will continue, to affect PI premiums and reduce the competiveness of that market. The combination of RDR, lack of long-stop and regulatory pressures/costs has clearly led to a reduction in the number of advisers in the market over the last 10 years. This includes the provision of advice by banks who have completely withdrawn from advice and who used to service those consumers who are now most affected by the advice gap. Potentially unlimited costs clearly pushes firms to compete in a more profitable space e.g. higher net worth individuals exacerbating the advice gap for certain consumers. Rising and unpredictable regulatory fees combined with the lack of a long-stop has and will reduce development, as firms have less profits and less predictability of earnings. Lack of a long-stop is also clearly a detriment to advisers winding up their business/retiring in manner which doesnt impact the FSCS.
Richmond House Group	Yes, see Q16
Rob Coote	No
Rowley Goodall Ltd	No comment
Royal Mail	This is not a topic on which the Keep Me Posted campaign is able to provide a response
Simplified Money Ltd	No comment
SK Financial	no
South West Financial Planning	I would not consider entering into financial services if I were new to the industry. Liability for life, increasing regulatory and PI costs, increasing compliance costs and administration. Our firm has ceased to maintain direct status with the FCA, and now part of a national IFA group.
Strategic Investment Solutions Ltd (Chris Kilner)	no comment
Strategic Solutions (Michael King)	no comment
Sussex Independent Financial Advisers Ltd	No comment
Swallow Financial Management LLP	Obviously, what individual would want to enter an industry and be exposed to an open ended unlimited financial liability. Running contrary to common law.
Taurus Global Financial Advisers Ltd	Of course the lack of a long stop prevents firms from starting up . It is a huge barrier to entry and is egregious
The Minster Partnership llp	no
Tom Orchard (Annetts & Orchard)	No comment
True Potential Wealth Management	think advisers/firms are very scared at the moment with the pension freedoms and what we can and cant do for clients, it seems we still advise based on the previous notion that an annuity or defined benefits scheme is the best thing for clients when common sense and ongoing support from the adviser would mean that this is not the case and drawdown would be better however then compliance depts. seem to want war and peace on figures and calculations that are barely understandable to the adviser never mind the client.
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	No
Wishart Wealth Management Ltd	No

Respondent	Q34: Do you have any comments about the benefits to consumers of the availability of redress for long-term advice?
2plan wealth management Ltd (Chris Smallwood)	It is of course reasonable that there should be a strong regime for redress surrounding long-term advice using the FOS regime. However the lack of any longstop is commercially irreconcilable, it inhibits change in the industry and acts as a handbrake on trade sales, mergers & acquisitions in that it adds risk to any potential purchase of a legacy client base Also we have seen an inconsistent approach from government in the way that the FOS is implementing guidance and how funds are raised each year for the FSCS, it is unreasonable that firms that are adequately controlling their risks and limiting their proposition away from high risk products should contribute equally in relation to the FSCS levy as those firms who do not operate similar safeguards, with calculations based solely on revenue
Abi Stidworthy	No comment
Active Wealth Ltd	Let the buyer beware. Simplify the advice. Made products that are "vanilla" and easy to understand.
Advantage IFA Ltd	Obviously it is a benefit to the consumer if they have an open window within which to complain but lets face it, if someone can't work out that an investment or pension is not right within 10 years of having taken it out then it is difficult to see how it could be that wrong. I think it is unfair that consumers have this long term redress availability.
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	This availability of redress makes people less careful about their decisions because they feel protected. There should be more onus on personal responsibility in consumers seeking advice
Aspire Online	No long stop clearly suits consumers but not advisers and if the lack of a long stop ultimately reduces the access to advice it may starts to affect consumers access to advice
AXA Wealth	No.
Barra Gorman	No comment
Berkeley Burke Group (Andrew Emery)	There are no immediately apparent benefits for the consumer if a longstop is applied. Indeed, one has to ask why we are even considering the protection level for the consumer in this review as that is exactly what is at the core of the present problems in the industry - the consumer does not take responsibility for their own decisions! We must not consider anything but what it will take for qualified, regulated and professional advisers to deliver their skills to the wider market. If we fail to follow this simple precept then the Financial Advise Market Review will be in serious danger of becoming an irrelevance and just repeating what had gone many times before (please see everything associated with RDR starting with CP121 from January 2002)
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	Due to the nature of financial services, it often difficult to assess whether a product was appropriately sold until some years later, especially in the case of new products. Without a reasonable time to make complaints, there is a concern whether the product should be sold.
Blue Scapes	No comment
BPH Wealth Management LLP	No comment
Brighton Financial Ltd	It helps to build reassurance for consumers that advice given is robust and for the long term.
Broad Wealth Management Ltd	There should be a time limit on how long consumers could get redress.
Browning Financial Planning Ltd	Yes. The recent story of a mortgage broker losing his business to an accountant who invested in Bulgaria is a disgrace. If he was guilty of inflating her income, she would have known about it too so is equally guilty of mortgage fraud. She made a bad property investment decision, not only does the FOS order the broker to repay her, 8% interest as well. Just why is a penalty interest 8%? It encourages people to complain when their portfolio might have only returned 3%.
Caleb Roberts Financial Management Ltd	No. It's a claim culture.
Caledonian Financial Management Ltd	No comment
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	The availability of redress for long-term advice should help build trust and confidence in the system, but there should also be protection measures in place for advisers from claims management firms looking to mass produce complaints.
Chattertons	We have many clients who were inappropriately advised for the time, many years ago. It is important that any decisions made by the ombudsman take into consideration what was normal for the time and penalise the appropriate individual, firm or regulatory regime for the advice given.

Respondent	Q34: Do you have any comments about the benefits to consumers of the availability of redress for long-term advice?
Citygate Consulting Limited	I don't think many clients think they will take advice because they can sue if it all goes wrong. I think they take advice because they don't have a clue themselves. I don't think it should be encouraged for clients to make complaints, as if there is no cost to them to "try their luck" then it is obvious that clients will make a complaint, if an investment were to fall in value. How many clients would make a complaint if the investment actually made a good return, even if it were the wrong thing for them?
Close Brothers Asset Management	No comment
Combined financial Strategies ltd	More companies means more choice, greater competition on fees and service propositions.
Cranbourne Financial LLP	There does need to be redress for consumers ref. long term advice, and there does need to be agreement on a sensible maximum period for that redress. This needs to take account of the high level of regulation of the market now that did not happen 20-30 years ago.
D Shearer	Important to ensure that a viable long term backstop for any consumer problems exist in the insurance market (it must NOT disappear)
Dean Robertson	no comment
Douglas Baillie Ltd	Consumers are certainly entiled to protection from bad advice. However I think that the recent emergence of so called Claims Management Companies (CMCs) and certain specialist Regulatory Legal (RL) firms are massively increasing the load on advisers and the FOS with many vexatious and disingenuous complaints that are very expensive to defend properly. The CMCs and the RLs have no interest whatsoever in resolving genuine complaints and only on securing massive % fees for the 'no win, no cost' nature of their commercial offering. their submissions to the advisers firm and the FOS are highly biased and I have fears that the FOS adjudicators are inedequately equipped, and without relevant exams and industry experiebce, to fend off such onslaughts and are more inclined to take the position that favours the complainant, and not to secure alternative, bus essential evidence that would support the advisers. This is rapidly becoming a major worry as the CMCs move on from PPI mis selling to encouraging consumers to complain about all investment advice. A further challenge is the failure of any regulation that can stop unauthorised firms from selling unreguated products to unsuspecting consumers who do not know the difference between regulated and unregulated advviser firms. such activities are frequently run from call centres where the 'adviser/salesmen' hold them selves out to be reulated, when they are not. Consumer losses are then directed at the Authorised Adviser community and a resultant increase in the consumer's distrust of all advisers! Any newv regulation MUST STOP these illegal activities.
Entrust Financial Planners Ltd	How can a sensible judgement be made on a complaint regarding a product sold 25 years ago, who would remember the prevailing regulation from that time and what was deemed appropriate or not. This is why the industry accuses the regulator and Ombudsman of 'hindsight advice'. Reduce the 8% interest rule. Given recent and current interest rates this figure should be revised downward.
Essential IFA	No comment
Esteem Money Ltd	No

Respondent	Q34: Do you have any comments about the benefits to consumers of the availability of redress for long-term advice?
Financial Foresight (NI) Ltd	No
Forward Plan IFA Ltd	There should be redress, but if the consumer has failed to engage between the original advice and say maturity then this has to be taken into consideration
Halebarns Financial Planning Ltd	I think consumers should take more responsibility for their decisions, but advisers have to make sure their advice is crystal clear and in layman's term. Advisers don't do this in my opinion for reasons stated previously
Hall Financial Planning LLP	No comment
Highclere Financial Services	It must be evident that the greater the number of advisers then the greater choice and the law of supply and demand would then force down the cost of advice. Advisers are now on higher plateau of knowledge than at any previous time and rather than being treated like naughty children they need to be considered as a respectable profession and dealt with accordingly. Consumers within financial services have greater protection than in any other business sphere. Every industry enjoys the protection of a 15 year longstop except this one. For years advisers have heard various regulators talking at us about working together yet the actions have betrayed the words. Treat advisers responsibly and you will reap greater rewards than by "shooting first' or making advisers "very, very afraid".
Intelligent Pensions	No.
Investec Wealth & Investment	Because of the lack of trust in the financial services industry as a whole and previous ???scandals??? consumers will feel they must have some redress for long term advice that turns out to be wrong. There must, however, be an element of caveat emptor and personal responsibility if somebody took out advice many years previously and has not sought to update that advice or check its validity.
Iwan Jones	It is leading to advisers leaving the industry
James Hay Partnership (Janet Morville-Smith)	No comment
John Lord	The process is difficult to identify and to get through and requires lots of evidence and preparation. Most people would give up so bad advice is rarely penalized. I reiterate my idea of linking fees to performance and penalties for under-performance
Jonathan Davis Wealth Management LTD	caveat emptor if the advice was given reasonably and timely and appropriate at the time
Joslin Rhodes Lifestyle Financial Planning	No comment
Katy Master	No comment
Lemonade LLP	We think equivalent or better consumer protection can be achieved in other ways.
Lighthouse Financial Advice	many things have a long stop how can someone be expected to be able to claim for "life" its ridiculous and has a great barrier to individuals joining the profession
Morgan Financial Ltd	Don't know
Morgans Ltd	I asked my interviewees how important they though it was that advice should be overseen by some form of independent regulator. The consensus was that this was important. It seemed to compensate for the lack of trust in the industry as a whole. This is illustrated by the table in the attached document

Respondent	Q34: Do you have any comments about the benefits to consumers of the availability of redress for long-term advice?
Openwork Limited	It is of course reasonable that there should be a strong regime for redress surrounding long-term advice using the FOS regime. However the lack of any longstop is commercially irreconcilable, it inhibits change in the industry and acts as a handbrake on trade sales, mergers and acquisitions in that it adds risk to any potential purchase of a legacy client base. Also, we have seen an inconsistent approach from government in the way that the FOS is implementing guidance and how funds are raised each year for the FSCS. It is unreasonable that firms that are adequately controlling their risks and limiting their proposition away from high risk products should
Park View FP Ltd	I agree consumers must have redress however surely if this is not identified within say 7 to 10 years was the advice actually wrong? At the moment due to increased professionalism and most forms offering on-going advice consumers are reviewing their plans annually where in the past they may have bought a product and not seen an adviser again for a very long time. Therefore the justification for a long stop is much stronger now.
PCM Asset Management Ltd	It is very useful and essential, but a 15 year long stop is completely sufficient.
Penguin	Stop ambulance chasing/PPI companies stirring up things that are not there and costing us all time and money
Polygon Financial Ltd	No incentive for clients to take responsablity for understanding the advice given. Also encourages ambulance chasers.
Profile Financial Solutions	No comment
Prosperity Wealth Management Limited	In an ideal world provided that a long term relationship has been established and the client is receiving regular face to face meetings, the adviser should be able to adapt a client strategy in order to ensure that the need for redress is not required. In reality the desire for profit drives the propensity for advice that leads to poor consumer outcomes and as a result consumers should always have access to redress for long term advice. The regulator could consider a one off insurance based solution to the long stop proposition.
Protection & Investment Ltd	No comment
Richmond House Group	Post RDR, clients receive annual reviews from their adviser in addition to annual statements from product providers. 6 years should be ample time for them to decide if they have been advised wrongly. The lack of a long stop means clients can await the outcome of their investment before making a claim. It is not surprising that unfulfilled outcomes tend to lead to increased claims of poor advice, when all that has happened is that markets have failed to perform.
Rob Coote	I feel that to judge a case retrospectively is harsh. We should be looking at what the situation was at the time
Rowley Goodall Ltd	No comment
Royal Mail	This is not a topic on which the Keep Me Posted campaign is able to provide a response.
Simplified Money Ltd	No comment
SK Financial	no
South West Financial Planning	Perhaps a compensation fund is appropriate, but surely some responsibility must be given back to the consumer. There are plenty of opportunities to review their affairs during the contract terms. The consumer has all the benefits but with no responsibility for their decisions, this cannot be right.
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	Regulation is an essential and accepted part of our industry, claim management companies should be regulated in terms of their activities and not allowed to exploit the perceived mantra that all advice firms are automatically in the wrong, the cost of their activities is funded by a levy on our industry and they are able to trade without the same restrictions creating a self perpetuating and funded conveyor belt of perceived wrong found with no accountability
Sussex Independent Financial Advisers Ltd	We do not believe consumers consider the availability of redress a factor when considering advice. It is only if things actually do go wrong that redress is considered
Swallow Financial Management LLP	No
Taurus Global Financial Advisers Ltd	The principle of Caveat Emptor is vital and has been lost in the idea that the consumer is always blameless and gullible.
The Minster Partnership llp	no
Tom Orchard (Annetts & Orchard)	No comment
True Potential Wealth Management	I think advisers need to cover themselves, however clients do sometimes have a short memory and are lead by third parties to say he/she never said that even though the client has signed to say they agree/understand
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	Most consumers bring about their claims for redress within a few years of the advice being given so I fail to see what benefits them by having a longstop in place

Respondent	Q34: Do you have any comments about the benefits to consumers of the availability of redress for long-term advice?
Wishart Wealth Management Ltd	I think the FSCS is a great source of comfort for consumers. The way it is funded is a great source of expense and stress for IFAs/intermediaries as it isn't sustainable. Ultimately this will mean more advisers leave industry - and the advice gap widens - hardly a consumer benefit. My own firm have not sold all the duff (allegedly regulated) products like Arch Cru and Key Data yet we are royally published in the pocket for it. Overall, if the insurer / product provider messes up and the FCA missed this (as product was regulated by them) then the consumer can go against the intermediary and their PI - whom failing they go to the FSCS. Ideal for consumers - but not for the advice community.

Respondent	Q35: Do you have any comments or suggestions for an alternative approach in order to achieve an appropriate level of protection for consumers?
2plan wealth management Ltd (Chris Smallwood)	See q34
Abi Stidworthy	No comment
Active Wealth Ltd	Not at present
Advantage IFA Ltd	Advertise at the outset when they take out the product how long they have within which to make any claim. Get them to sign to this effect.
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	The FSCS should provide the long stop protection
Aspire Online	Why can't different products have different long stop end dates
AXA Wealth	No.
Barra Gorman	No comment
Berkeley Burke Group (Andrew Emery)	As previously suggested, the consumer is well protected by the existing arrangements - some would say too well protected! This review should concentrate its efforts on redressing the imbalance that successive regulators and/or governments have created between the financial advisory community and the consumer.
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	No comment
Blue Scapes	No comment
BPH Wealth Management LLP	The current compensation system clearly isn't working with some firms experiencing over 100% increase in costs when they haven't had any claims. The bizarre situation of the public being able to invest in high risk, unregulated products and then claim compensation on the grounds of bad advice which then falls onto firms which had no involvement should not be allowed to continue. There should be an approved list of products and funds run by the FCA so everything acceptable is kite marked and covered by the compensation schemes, so that if a consumer buys something different, it has to state it's not covered, then they know it's not protected at all. In addition, there should be a product levy on the approved products. In addition, more action must be taken by the FCA to prevent "phoenixing" whereby individuals walk away from a firm which is deemed in default of the FSCS and then start a new firm. Such a situation should not be permitted at all, unless the individuals themselves have provided restitution to anyone who's lost money through bad advice.
Brighton Financial Ltd	No.
Broad Wealth Management Ltd	No comment
Browning Financial Planning Ltd	Cutting red- tape, installing a 15 year long stop, refusing redress on unregulated investments (whether regulated advice provided or not) and funding the FSCS levy from a product levy (so everyone pays a little rather than a few paying thousands of pounds annually). This would also reduce PI premiums. overall this would substantially reduce the cost of running an advice firm and the cost of advice would reduce. Whilst there always were IFAs who deal with the high end, recent changes have forced middle market advisers to charge more and these people (me included) would welcome the opportunity to lower my fees to allow me to deal with "normal" people rather than just the wealthy. This solution is so obvious but as a small, local, limited company, I doubt anyone will listen to my views. its like the Emperor with no clothes, everyone can see the problem but it takes the ordinary folk at the bottom of the advice chain to point out the obvious.
Caleb Roberts Financial Management Ltd	Yes, make sure it is the outcome of a complaint is based on standards, market conditions and practice at that tiome which the FCA was happy with.
Caledonian Financial Management Ltd	No comment
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	Varied limitation periods linked to products would be ideal, and possibly decreasing/tiered liability with time? If it was practical to implement, then could also introduce a way of limiting the liability on a firm if there is doubt with whether a case is upheld or if a case is unclear vs an out-right miss-selling of a product
Chattertons	No comment

Respondent	Q35: Do you have any comments or suggestions for an alternative approach in order to achieve an appropriate level of protection for consumers?
Citygate Consulting Limited	I see nothing wrong with there being consumer protection, I think the breakdown of a client fee for advice should clearly distinguish how much of their fee is actually going into an FSCS pot. For example, if the figure is risk based rather than based on the fee the client is charged, clients that drive a hard bargain will see that the "poor adviser" is getting completely shafted, if for example for each ??100k invested there should be an annual contribution to the FSCS of ??100 AND a minimum amount per client. It does highlight the fact that for a transactional client that is not going to pay an on-going fee, you would need to cover this risk for potentially 30+ years depending on how long you live! It would help wake a lot of advisers up and consumers to the problems and enable the correct fee to be charged.
Close Brothers Asset Management	No comment
Combined financial Strategies ltd	We have capital adequacy, professional indemnity cover, the FSCS, the Ombudsman and the FCA regulating te industry. It seems that by not setting up the longstop the FCA is admitting it is incapable of effectively regulating the industry in a manner that protects the consumer. That should not be the overriding reason for not allowing us a fair long stop. They should go away and determine to resolve their own shortcomings.
Cranbourne Financial LLP	No comment
D Shearer	No comment
Dean Robertson	Borrowed from another advisor but an excellent idea. "Yes. Once clients have had 10 annual reviews and had the plan / services explained every year for ten years and are happy with the ongoing situation and understand it and sign every time to say they understand it, no more liability. 10 opportunities, 10 years to wash out markets moves and watch ups and down (if investments). 10 annual opportunities as opposed to none in most other professions. "
Douglas Baillie Ltd	Consumers need to be equally bound to a universal and equally binding 'code of conduct'. It is not just the adviser that needs to be open and honest. This should apply to consumers as well. You only need to look at some complaints to FOS to see that consumers will say and do anything, including telling lies and providing misinformation to support their complaint, with no penalty or cost to them or their CMC or RL firm whatsoever if that advice was found to be sound and suitable. And without the right of appeal for advisers outwith the FOS, but with the complainant having that right, it is manifestly unfair and very skewed in favour of the consumer, to the detriment of the advisers and the adviser firm. With 'freedom' comes 'resposnsibility' and consumers need to be aware of this and not feel that they can 'do as they please' and when it all goes wrong turn to some kind of compensation scheme.
Entrust Financial Planners Ltd	No comment
Essential IFA	I do believe that the FSCS needs to be funded via a product levy rather than an advice firm levy as I do believe that this would represent a fairer way of funding the FSCS. I also believe that the FCA needs to fully support the authorisation and regulatory advice structure and to take away the journalistic exemption from the FSMA 2000
Esteem Money Ltd	No
Financial Foresight (NI) Ltd	For FSAVC Levy product providers who get margin from products as opposed to charging firms who are still trading for the sins of departed firms.
Forward Plan IFA Ltd	There should be redress, but if the consumer has failed to engage between the original advice and say maturity then this has to be taken into consideration
Halebarns Financial Planning Ltd	Consumers are over protected.
Hall Financial Planning LLP	No comment
Highclere Financial Services	The FOS rules should mirror those of the court system. Consumers have been encouraged to complain in the knowledge that they just might win compensation. I personally know of many consumers who have received compensation for PPI or endowment mis-selling when they have admitted to me that they knew exactly what they were doing and were now queuing up for free money courtesy of the regulator. The ombudsman service needs to be reconfigured to make it fit for purpose. All adjudicators should be qualified to QCF4 and paid accordingly. If the jurisdiction issue was dealt with in a proper investigative manner then complaints would be reduced with a consequent lower requirement for adjudicators and ombudsmen.

Respondent	Q35: Do you have any comments or suggestions for an alternative approach in order to achieve an appropriate level of protection for consumers?
Intelligent Pensions	No.
Investec Wealth & Investment	No comment
Iwan Jones	Be more open in approaching consumers
James Hay Partnership (Janet Morville-Smith)	na
John Lord	No comment
Jonathan Davis Wealth Management LTD	No comment
Joslin Rhodes Lifestyle Financial Planning	No comment
Katy Master	No comment
Lemonade LLP	No comments
Lighthouse Financial Advice	Post RDR the need and evidence of Annual reviews provided by a financial adviser could lead to the application of a time bar, if these are evidenced as being given to the client, the client is reviewing what they purchased annually and then a 5 or 10 year time bar is more than sufficient. If however a product is provided and then consultant/firm walks away then greater protection could be provided of 25 years. it would lead to greater quality after care service.
Morgan Financial Ltd	Holistic advice is so complex advisers now have to think about protecting themselves as much as the client.
Morgans Ltd	A system of auto-enrolment for protection and savings.
Openwork Limited	We would like to see the primacy of the FCA reasserted, with FOS brought more clearly into line with regulatory objectives. Similarly, if consumers choose to invest in clearly unregulated vehicles, there should be absolute clarity that they do not have recourse to the same levels of protection that would otherwise apply for regulated transactions.
Park View FP Ltd	I believe a product levy should be considered as opposed to an advice levy if a contract fails. The same with unregulated investments, regulated advisers should not be held responsible if an unregulated contract or advice fails. It is not fair and is not sustainable.
PCM Asset Management Ltd	see Q34
Penguin	regulate the products that come to market
Polygon Financial Ltd	PI Insurance should be enough for to underwrite redress for legitimate complaints, using rule based regulation.
Profile Financial Solutions	No comment
Prosperity Wealth Management Limited	The application of a long stop will not serve to protect consumers and the regulator could consider a one off insurance based solution to the long stop proposition. The introduction of a product levy administered by providers and paid for by consumers should be a better way of funding any requirements for consumer protection. The levy could be structured so that higher risk products carried higher levies to enable consumers to make an informed decision.
Protection & Investment Ltd	No comment
Richmond House Group	The consumer is over protected. Introduce a long stop, reduce the regulatory burden, stop compensation for unregulated products, bring back caveat emptor. The balance has been shifted too far towards 100% client security at the expense of the market.
Rob Coote	No
Rowley Goodall Ltd	No comment
Royal Mail	This is not a topic on which the Keep Me Posted campaign is able to provide a response
Simplified Money Ltd	No comment
SK Financial	no
South West Financial Planning	No

Respondent	Q35: Do you have any comments or suggestions for an alternative approach in order to achieve an appropriate level of protection for consumers?
Strategic Investment Solutions Ltd (Chris Kilner)	It seems clear to me that the current FSCS structure, in terms of sustainability and longevity of funding, cannot continue as it is in order to ensure the long-term protection of consumers. The FSCS categorisation and grouping of activities and product advice is deficient resulting in negative cross-subsidy – this being where completely un-linked products and/or activity are grouped together as if equal resulting in lower risk advisory firms funding higher risk areas of activity. For example, long term insurance contracts (life insurance) are grouped with Pension Advice and SIPP Management within the FSCS's 'Life & Pensions' categorisation. This has already resulted in insurance advisory firms having to contribute toward a funding category where most compensation costs have arisen from pension firms. Another example is whereby unregulated collective investment schemes and other non-mainstream investments are grouped together with mainstream investments when it comes to compensation funding. The above scenarios are simply outrageous and this directly effects the protection offered to consumers as good advisers become dis-enfranchised and simply leave the industry therefore lowering the funding pool. This cross-funding also encourages and makes it too easy for firms to advise in the higher risk product areas as it easy to exit the market and pass liabilities onto the remaining pool of advisory firms. If that pool was a much smaller one with liabilities allocated to those responsible for their activity this would act to protect customers by making the intermediary firms accountable for their activities. The nature of these high risk activities deserves policing properly. Not only would this approach support the continued funding of the FSCS long into the future it would also act to minimise the number of firms proposing to carry out activity in the area of unregulated 'non-mainstream investments' and therefore the potential distribution of such products to the public is reduced.
Strategic Solutions (Michael King)	No comment
Sussex Independent Financial Advisers Ltd	No comment
Swallow Financial Management LLP	If a firm folds it falls on the FSCS so if the adviser has left and does not return to the industry then the liability could transfer there. As each individual has there own FCA number should they with to come back into the industry then any advice/longstop liability would have to be addressed and repaid to the FSCS. The FSCS should also be funded by the fines issued by the FCA or by a policy/plan levy Surely that would focus minds and rid the industry of a great injustice being imposed on them!
Taurus Global Financial Advisers Ltd	Product levy at the manufacturing stage for all products.
The Minster Partnership llp	no
Tom Orchard (Annetts & Orchard)	No comment
True Potential Wealth Management	Client and adviser should sign a contract to say this advice has been accepted and explained by both the client and adviser respectively separate to any application forms. Some firms get the client to sign the suitability report. Although some SR are very long they need to be short and concise and to the point.
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	No
Wishart Wealth Management Ltd	There is too high a level of consumer protection in financial services, so my suggestion would be to reduce the level of consumer protection to an appropriate level. As the government has been responsible for the increase in complexity in financial services, central government should shoulder most of the cost of consumer protection.

Respondent	Q36: Do you have any comments on the extent to which firms are able to provide consistent automated advice at low cost? Are you aware of any examples of this, either in the UK or other jurisdictions?
2plan wealth management Ltd (Chris Smallwood)	n/a
Abi Stidworthy	No comment
Active Wealth Ltd	I am aware of some however, none that have worked well. Clienst need face to face or simplified phone advice
Advantage IFA Ltd	No
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	No comment
Aspire Online	I don't feel as if I know enough about auto advice, we don't offer this advice
AXA Wealth	Following the FCA finalised guidance the regulatory environment isnt quite the barrier it was previously with a few new firms entering or considering entering the automated advice market. We believe that automated advice will become an increasingly important channel for consumers who require and are willing to pay for advice through a personal recommendation. Automated solutions wont be suitable for all consumers and consumers may well seek advice through a number of channels e.g. automated advice for more straight forward investments like ISAs and face to face advice for more complex needs.
Barra Gorman	No comment
Berkeley Burke Group (Andrew Emery)	The area of development of "robo advice" in our industry is still very young and it is almost certainly too early to make any meaningful assessment. Additionally, I do not fully understand what work has been completed (or even undertaken) within the "robo advice" arena in other jurisdictions. From what I have read in the popular financial press in recent months, it is anticipated that something like $3trillion will be transacted in the USA by this method by 2020
Berkeley Burke Group (Tony Durant)	
Blevins Franks Financial Management	No comment
Blue Scapes	No comment
BPH Wealth Management LLP	No comment
Brighton Financial Ltd	No
Broad Wealth Management Ltd	No comment
Browning Financial Planning Ltd	No. My clients want to deal with a "trusted adviser", a real person who is there to help them when they need it.
Caleb Roberts Financial Management Ltd	No comment
Caledonian Financial Management Ltd	As mentioned earlier. The very fact this the advice is automated flies in the face of "advice". Getting advice in my opinion means speaking to an expect who is trained to draw out all of the relevant information from a client and then advice them based on this information. If the conversation never takes place how can it be called advice? I think this can work but it's not advice as such and the rules relating to it should be changed to reflect this fact.
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	No.
Chattertons	Nutmeg, Fidelity and HL already provide what I would describe ??a low cost brokerage model.
Citygate Consulting Limited	If EVERY client is different then how is this possible. Clients want to be made to feel like they are individual and that their circumstances are unique. I fully agree that cash flow planning should form the basis of all advice, but the issue is clients will largely need an adviser to do the cash flow planning with them.
Close Brothers Asset Management	No comment
Combined financial Strategies ltd	Again please refer to my fears on Robo-advice. Unfortunately, anything that is "regulated advice" can not be low cost with all the risk and burdens placed on us as firms.
Cranbourne Financial LLP	No comment
D Shearer	I don't know of any "robo-advice" systems yet so it's either full advice or DIY?
Dean Robertson	None, I do not believe a scientific program can ever replace the experience and skills of a quality regulated adviser.
Douglas Baillie Ltd	Yes, we are already dong this for pension advice, and I have offered to demonstrate how that works to the FCA via 'project innovate'. I personally tried to engage with the project innovate team at the FCA a while ago, but was very disappointed when the sole team member turned up and clearly did not know anything whatsoever about the advice subjects let alone the value of the automated outcomes.
Entrust Financial Planners Ltd	No and It won't be taken up by firms due to the current regulatory environment. Look at how unsuccessful project innovate has been.

Respondent	Q36: Do you have any comments on the extent to which firms are able to provide consistent automated advice at low cost? Are you aware of any examples of this, either in the UK or other jurisdictions?
Essential IFA	No comment
Esteem Money Ltd	No
Financial Foresight (NI) Ltd	Automated advice only suitable for simple products.
Forward Plan IFA Ltd	automated provision of contracts is not advice. Advice is knowing a consumer and recommending a suitable way forward to meet their needs etc
Halebarns Financial Planning Ltd	No comments, but I am not a fan of robotic advice.
Hall Financial Planning LLP	No comment
Highclere Financial Services	N/A
Intelligent Pensions	As indicated previously we believe automated advice would work well as a precursor to professional advice, rather than an end in itself. We currently operate such a service which has worked very well. As this was a bespoke tool which we designed and built between ourselves and a web consultancy there was a cost of several thousand pounds but
Investec Wealth & Investment	No comment
Iwan Jones	No
James Hay Partnership (Janet Morville-Smith)	No comment
John Lord	No comment
Jonathan Davis Wealth Management LTD	No comment
Joslin Rhodes Lifestyle Financial Planning	It doesn't work in enough of a format to make it commercially viable. Move on.
Katy Master	No comment
Lemonade LLP	In our opinion this is the solution to low cost financial advice. We are currently using and developing examples.
Lighthouse Financial Advice	my only experience is that the advice provided by the automated service is very poor and is not defined to the individual. The systems I have used are very bland and not bespoke. They need to be a lot better to offer the quality required or we will have a lot of problems in the future, again.
Morgan Financial Ltd	We are advised by compliance services that automated advice is not viable. The risk is too great. Isn't that what the money advice service is for?
Morgans Ltd	No
Openwork Limited	Blackrock are providing investment based Roboadvice in the US and have indicated they intend to launch a similar proposition to the UK market in 2016 as have Intelliflo. LV have secured regulatory approval to offer fully regulated retirement advice to consumers looking to access their pension funds. Their CORA Roboadvice proposition includes risk profiling, suitability check and personalised recommendation for a fee of 199.
Park View FP Ltd	No sorry
PCM Asset Management Ltd	No
Penguin	i dont think robo advice is the solution to the advice gap
Polygon Financial Ltd	Consistent automated advice at low cost is not compatable with individual financial planning.
Profile Financial Solutions	Please see answers to Q10 and Q12. In summary our business has used a combination of technology and telephone based advice to enable our 10 regulated advisers to provide an advice service to 5000+ mass market consumers so far in 2015. We believe our business alone is scalable to deliver advice to 100,000+ consumers pa. The delivery element of a solution to the Advice Gap exists, the biggest problem is encouraging those in the Advice Gap to use services such as ours to improve their financial outcomes.
Prosperity Wealth Management Limited	No comment
Protection & Investment Ltd	No comment
Richmond House Group	No comment
Rob Coote	No
Rowley Goodall Ltd	No comment
Royal Mail	The Keep Me Posted campaign welcomes any measures intended to ensure that consumers have easy access to important financial or administrative information. Consequently, we support the use of automated advice through a range of platforms. We would also stress the importance of ensuring that these systems are complemented with additional systems which those without immediate access to online or other digital communications platforms can easily engage with.
Simplified Money Ltd	No comment
SK Financial	no

Respondent	Q36: Do you have any comments on the extent to which firms are able to provide consistent automated advice at low cost? Are you aware of any examples of this, either in the UK or other jurisdictions?
South West Financial Planning	No
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	There is no substitute for professional face to face regulated advice
Sussex Independent Financial Advisers Ltd	No comment
Swallow Financial Management LLP	No
Taurus Global Financial Advisers Ltd	No comment
The Minster Partnership llp	choice of competitive ongoing fees or offer the option of ad hoc fees as and when needed.
Tom Orchard (Annetts & Orchard)	None, I do not believe a scientific program can ever replace the experience and skills of a quality regulated adviser. It will be without doubt a massive nightmare in the making and who will then pay the redress? That is not to say that some online tools cannot take the strain out of parts of the process, but to leave an uneducated consumer to do themselves Is madness. For example, just regarding ATR online forms, we all know that when the markets are at the tops, clients are far more likely to want to take risks (even though more likely a correction will follow) and when markets are low, clients become far more risk averse (even though more likely some buying opportunities). If you can find a cure to behavioural fianc issues first, automation has half a chance. If not, its the next big miss-selling scandal.
True Potential Wealth Management	No
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	No
Wishart Wealth Management Ltd	In the USA websites Betterment and WealthFront seem to do a very good job of making investing easier for consumer who does not want/need face to face advice.Advice though needs to be paid for. As soon as consumer goes 'direct' in the UK, often they lose many of their consumer rights as they are deemed to be self-advising (without advice).

Respondent	Q37: What steps could we take to address any barriers to digital innovation and aid the development of automated advice models?
2plan wealth management Ltd (Chris Smallwood)	Give the industry confidence to invest in the provision of digital technologies by approving a range of advice-lite products which are simple to process and administer and therefore require less regulatory oversight. Key to this is for such products to be kite marked or similar to clearly flag to consumers they are exempt from full redress particularly the FOS.
Abi Stidworthy	No comment
Active Wealth Ltd	No comment
Advantage IFA Ltd	You could allow commission as long as it is disclosed prominently to the client.
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	No comment
Aspire Online	I don’t feel as if I know enough about auto advice, we don’t offer this advice
AXA Wealth	We do not believe that any specific regulatory change is required for specifically for auto-advice. However, a further simplified approach across regulation generally is desirable in order to improve access to advice and to encourage further innovation. These points are covered previously in this document.
Barra Gorman	No comment
Berkeley Burke Group (Andrew Emery)	Digital, or "robo advice" should be simple to access for the consumer - but at a price. There must be an acceptance by the consumer that there will be no abdication of their responsibility and thereby no recourse via the financial services industry. The FOS/FSCS/POS should be instructed to follow the same ethos too.
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	The different types of advice having different conduct rules.
Blue Scapes	No comment
BPH Wealth Management LLP	No comment
Brighton Financial Ltd	Don't know. This is a really tricky one for the regulator to deliver
Broad Wealth Management Ltd	No comment
Browning Financial Planning Ltd	no comment
Caleb Roberts Financial Management Ltd	No Comment
Caledonian Financial Management Ltd	In particular, the area of liability for advice needs to be addressed. How can an adviser be held accountable for someone investing via and automated process? There needs to be separate rules which apply to automated "advice".
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	This is probably an area being explored by larger financial firms, as small advice firms would not have the capital to invest in developing this technology.
Chattertons	No comment
Citygate Consulting Limited	Will you ever accept "impersonal" suitability reports.
Close Brothers Asset Management	No comment
Combined financial Strategies ltd	No comment
Cranbourne Financial LLP	No comment
D Shearer	Get real people to battle test the software and ensure that programmers talk to potential end users at all stages.
Dean Robertson	no comment
Douglas Baillie Ltd	Try to better understand the barriers that exist between delivering compliant advice and the expectations of the consumer who demand simplicity, (tell me what to do), that cannot be successfully delivered in such a complex and very expensive regulatory and constraining envisonment. The digital innovation that i have designed and tested in real time, and at 'the coal face' actually works, and consumers like it a lot.A further barrier is the lack of understanding of the 'advice process' by the major pension providers whose knowledge and expertise seems to be confined to product design, and not to consumer needs at the point of advice. I have developed an 'end-to-end' (discovery to end of advice and implimentation) automated pension advice process that is fully engaged with one major UK pension provider already, with three more providers now testing or reviewing the functionality and integration with their own in-house systems.
Entrust Financial Planners Ltd	No comment

Respondent	Q37: What steps could we take to address any barriers to digital innovation and aid the development of automated advice models?
Essential IFA	I think automatic advice as previously stated can be a dangerous tool and if introduced should be in a class of its own when it comes to funding the FSCS. I also believe that there should be clear warnings that any robotic advice is not personalised even if it is based on a decision tree principle. We should stop using the word advice when referring to robotic advice and use clearer language like decision tree process. The problem here is the use of language and the muddling of terms which many in the IFA industry find frustrating. Financial advice should only refer to advice given by advice given by a qualified practitioner and not an unauthorised decision tree which hold no liability.
Esteem Money Ltd	Don't dumb down advice. Consumers should value it, not go for the cheapest option.
Financial Foresight (NI) Ltd	Automated advice only appropriate for simple products.
Forward Plan IFA Ltd	No comment
Halebarns Financial Planning Ltd	How would consumers be protected against fraud? In the main they are too tusting unfortunately
Hall Financial Planning LLP	No comment
Highclere Financial Services	N/A
Intelligent Pensions	As with supporting the provision of lower cost simplified or focused advice the primary objective should be clear and unambiguous guidance.
Investec Wealth & Investment	We have already seen some of the barriers put in place by traditional insurance companies to protect market share and this is currently being challenged by the pensions freedom legislation. The ability of digital innovation to undercut the traditional suppliers will further shape the market. In particular the ability of the digital providers to quickly gain large scale will be seen as a threat compared to the more traditional distribution models
Iwan Jones	Not sure
James Hay Partnership (Janet Morville-Smith)	No comment
John Lord	No comment
Jonathan Davis Wealth Management LTD	No comment
Joslin Rhodes Lifestyle Financial Planning	Whether you like it or not , people buy people.
Katy Master	I don't think you should be
Lemonade LLP	Current barriers are an adviser is required if a customer answers questions inconsistently. If minimum standards can be agreed (for example gateways and warnings) so that a customer can do more without adviser involvement then the scope of these services can be extended. Warnings and definitions must be plain English, clear & concise to avoid a screen being full of 'Important Information'. Otherwise the message will be lost.
Lighthouse Financial Advice	the auditing steps involved should be FCA sign off showing the system has satisfied the regulators concerns at providing advice.
Morgan Financial Ltd	let me ask a question how can a consumer decide if they need complex advice face to face or automated advice at a lower cost? They are by their nature dealing with an unknown.
Morgans Ltd	No comment
Openwork Limited	Give the industry confidence to invest in the provision of digital technologies by approving a range of ???advice-lite??? products which are simple to process and administer and therefore require less regulatory oversight. Key to this is for such products to be kite marked or similar to clearly flag to consumers they are exempt from full redress particularly the FOS.
Park View FP Ltd	We are not in this market at present however financial crime over the web is growing so this type of development whilst needed must be safe
PCM Asset Management Ltd	Not interested in automated advice models.
Penguin	provide more certainty around rules rather than continually issuing guidance that leaves businesses scratching their heads
Polygon Financial Ltd	Whole concept is flawed and counterproductive to good personal advice.
Profile Financial Solutions	The major barriers to providing digital and technology enabled advice are two fold: 1. Consumers lack of confidence, willingness and knowledge to engage with purely digital advice and advice in general; 2. The custodians of existing pension savings inefficiency and poor service in enabling consumers and their advisers to access the information required to provide advice on these savings. The biggest single step the Government could take to facilitate efficient advice models is to ensure the information required to deliver advice is made readily available by existing pension custodians - ideally both for marketing and processing purposes. An on-line portal containing details of all existing pension arrangements would enable consumers to easily establish their existing position and receive advice quickly and efficiently.

Respondent	Q37: What steps could we take to address any barriers to digital innovation and aid the development of automated advice models?
Prosperity Wealth Management Limited	No comment
Protection & Investment Ltd	No comment
Richmond House Group	No comment
Rob Coote	Don't know
Rowley Goodall Ltd	No comment
Royal Mail	The Keep Me Posted campaign is not an anti-digital campaign but a pro-consumer choice campaign promoting the inclusion of vulnerable groups. With this in mind, we welcome steps to address the barriers which exist for some of those who wish to access digital platforms and which may support new automated advice models. However, we would recommend that these steps also take into account that a significant number of vulnerable consumers are unlikely to be easily able to access financial advice through digital platforms. Consequently, attention should be given to ensuring that they remain able to access advice through traditional mediums.
Simplified Money Ltd	Reassurance about treatment of certain types of advice so large investments in automation can be made with confidence. And fair distribution of levies so that businesses can invest to keep costs down and make sure different customers get what they need at a price that is fair to them
SK Financial	Education education, education
South West Financial Planning	Unknown
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	Refer to Q36
Sussex Independent Financial Advisers Ltd	No comment
Swallow Financial Management LLP	As an example of the digital revolution, in 2007 we could obtain a mortgage offer from submission to issue by the lender in 3 days, now because of regulatory requirements its 30 - 60 days to obtain. Multiply this across the whole financial services industry and I think the answers in there somewhere!
Taurus Global Financial Advisers Ltd	As above - stop levying rising fees and FSCS levies etc.??
The Minster Partnership llp	More media exposure to explain the benefits of face to face personalised ongoing advice
Tom Orchard (Annetts & Orchard)	The restricted by provider firms will invest heavily into this and barriers will not be an issue, as the only barrier ultimately is cost. They will manufacture a product that recoups that cost at the expense of the consumer. An extremely false economy. Only allow elements of automation, under the guidance of a highly trained and regulated adviser. Its why none of us will fly in unmanned planes, even though the technology has been around for ages. The pilot hardly ever touches the controls, but he always knows what???s going on and can step in. You need to add the barrier of not allowing manufacturers to be distributors. No matter how deep their pockets.
True Potential Wealth Management	Put a levy on the advisers to pay for a system (Joke)
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	Don't know
Wishart Wealth Management Ltd	It is a challenge. The greatest barrier to digital innovation and automated advice models is consumer apathy. Many consumers lack a proper financial education hence lack knowledge and have a very short attention span and outlook on their life.

Respondent	Q38: What do you consider to be the main consumer considerations relating to automated advice?
2plan wealth management Ltd (Chris Smallwood)	The main issue to resolve is to provide consumers with greater access to advice and choice. Many clients are currently excluded from the advice process because they are either unable or unwilling to pay the fees advisers require in order to profitably service their needs. However there are many relatively simple products e.g. ISA, Term Assurance where full advice is not required and it is feasible to provide low cost automated advice.
Abi Stidworthy	No comment
Active Wealth Ltd	No soft facts are taken into account
Advantage IFA Ltd	It has limitations, people need to be made aware of these.
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	No comment
Aspire Online	Low cost advice
AXA Wealth	Consumers should receive the same level of protection irrespective of the medium of the advice. For example, for a personal recommendation the suitability rules should be consistent for both face to face and automated advice. Two of the perceived advantages of automated advice are improved access to advice but at a lower cost. Crucially, should a firm consider offering automated personal recommendations, the model has to be commercially sustainable and therefore the regulatory framework must allow for and encourage such innovation.
Barra Gorman	No comment
Berkeley Burke Group (Andrew Emery)	Cost effectiveness, especially for those consumers who see little value in what an adviser, or an advisory firm can offer to them. b) Ease of access (for most) if the technology is created to be simple c) Convenience and time saving - it can be done as-and-when best suits the consumer
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	Whether the advice to the client is correct and appropriate
Blue Scapes	Ease of use allowing for / enabling subsequent focused, individual, face-to- face referral of client and advisor. Please, no more impersonal, questionnaire based' "remote", anodyne forms (despite the ubiquity of the computer). My late wife and I, and my child, have received great benefit from our associations with both of our IFA's over a period of many years. Without their respective assistance, their preparedness to treat us as individuals, their thoroughness and professionalism, advice, and expertise, and their availability at the end of a telephone 24/7, has enabled us to survive and build with greater confidence than would have been possible without their help and services. I find myself, now in later years and without my life partner (the brains) relying more and more on my IFA for advice in what seems to be an increasingly complicated and dysfunctional world, a real asset!
BPH Wealth Management LLP	That it's clear to the consumer that they're only getting targeted advice.
Brighton Financial Ltd	That the outcomes are of high quality and do not result in negative outcomes for consumers. Ideally, the outcomes should be the same as if face-to-face advice was sought.
Broad Wealth Management Ltd	No comment
Browning Financial Planning Ltd	no comment
Caleb Roberts Financial Management Ltd	Will it be correct.
Caledonian Financial Management Ltd	The main consideration is to point out that this is not "advice". You are doing it yourself. Without speaking to an adviser you have no way of knowing if this is the best course of action for your circumstances. I don't think it should be called advice.
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	Will the technology be able to adequately gather Know Your Client information and ask the appropriate open questions that is necessary to obtain relevant information? If regulated ???automated??? advice can be given based on a simpler data set than from a human adviser, is this fair and would the same consumer protection be given?
Chattertons	No comment
Citygate Consulting Limited	There should be warnings as to what cannot be included by virtue of automation. For example, crap in = crap out. If you don't have a person challenging the input then the output won't be correct.
Close Brothers Asset Management	No comment
Combined financial Strategies ltd	For a start anything automated should not be called"Advice". it is a form of guidance.
Cranbourne Financial LLP	No comment

Respondent	Q38: What do you consider to be the main consumer considerations relating to automated advice?
D Shearer	Need for support with a real person (accredited but not necessarily an IFA) OR self guided use. Some hybrid system where automated advice could be given at a much cheaper cost with the ability to have some IFA advice if found necessary.
Dean Robertson	no comment
Douglas Baillie Ltd	Consumers need to be confident that they are dealing with an FCA regulated firm, that have the appropriate permissions, and that they can also talk to a real person, usually a qualified adviser, if and when necessary. I tested this technology and hybrid solution extensively via my on-line website called www.comparemypension.com over several years, and i now have the results of that available.
Entrust Financial Planners Ltd	No comment
Essential IFA	Consumers will be attracted by automated advice as they perceive the service to be free or low cost. The fact is many of the online providers or information givers hide their true costs either via not fully disclosing that an article has a biased opinion pointing a consumer toward a product or hiding the true cost of a product in technical jargon. Robotic advice would have to be as clear on charges as an IFA fee agreement otherwise consumers are likely to be fleeced.
Esteem Money Ltd	Confusion on consumers part
Financial Foresight (NI) Ltd	Automated advice only appropriate for simple products.
Forward Plan IFA Ltd	no comment
Halebarns Financial Planning Ltd	Not sure. Consumers prefer to see people face to face. When "the man from the Pru" walked the streets, the population was very well served an protected.
Hall Financial Planning LLP	No comment
Highclere Financial Services	N/A
Intelligent Pensions	Ideally, automated advice models should be limited to generic advice for everything but the simplest products, but could become a very useful stepping stone to low cost real advice ('specific professional advice'). The danger is that over reliance on automated advice could lead to poor consumer outcomes in more complex scenarios, especially given the opportunity for the user to manipulate input data to achieve their desired outcome.
Investec Wealth & Investment	There are many consumers, including many of those who are sitting in the advice gap, who will not consider banking online because of security risks and a mistrust of technology and the associated perception of an increased risk of fraud. It would be extremely difficult to persuade these people to commit funds whether via regular contribution or lump sum on an online platform using an automated advice programme. Recent data loss scandals and the well-publicised growth in online fraud will not have helped this.
Iwan Jones	Scams
James Hay Partnership (Janet Morville-Smith)	No comment
John Lord	No comment
Jonathan Davis Wealth Management LTD	No comment
Joslin Rhodes Lifestyle Financial Planning	No comment
Katy Master	As a consumer I have no desire whatsoever to take financial advice from any automated service. The whole point of seeking financial advice is that I do so from a person: someone who knows me and how I tick. I want the advice to be personal to me in a meaningful way, not the result of an algorithm.

Respondent	Q38: What do you consider to be the main consumer considerations relating to automated advice?
Lemonade LLP	That the individual knows what he is buying including the benefits and drawbacks.
Lighthouse Financial Advice	Price as they will not know what good looks like
Morgan Financial Ltd	Consumers have too much paperwork to read. I have a friend who volunteered for Citizens Advice. He realised how some people at the lower end of the spectrum could not be given information to go and act on. They needed someone to hold their hand. An automated process cannot serve the most needy. Only a charity like St Lukes Advice service can fill gap.
Morgans Ltd	No comment
Openwork Limited	The main issue to resolve is to provide consumers with greater access to advice and choice. Many clients are currently excluded from the advice process because they are either unable or unwilling to pay the fees advisers require in order to profitably service their needs. However there are many relatively simple products e.g. ISA, Term Assurance where full advice is not required and it is feasible to provide low cost automated advice.
Park View FP Ltd	Not sure as I believe most people still value face to face advice and interaction. If a client has very basic need then maybe a faceless online app works but for any thing else I believe face to face advice is vital to really understand a clients needs and come up with a proper solution.
PCM Asset Management Ltd	The system should be clear enough and easy enough for people to use, but essential that DIY 'advice' going wrong should not be propped up by the advice community, if / when it goes wrong. Those providing the products, should be insuring a central 'fund' from their own resources.
Penguin	only serves those with money - what about those who dont have assets or wealth, who need to start a savings plan or review an existing small plan or need to be "sold" some life insurance
Polygon Financial Ltd	Low cost, plain vanilla. Cannot take account of their own needs.
Profile Financial Solutions	No comment
Prosperity Wealth Management Limited	Cost

Respondent	Q38: What do you consider to be the main consumer considerations relating to automated advice?
Protection & Investment Ltd	No comment
Richmond House Group	No comment
Rob Coote	Simplicity, protection from scams and right of recourse for the consumer
Rowley Goodall Ltd	No comment
Royal Mail	Given the Keep Me Posted campaign???s particular focus on those without easy access to digital platforms, we would recommend that the FCA gives particular consideration to how those from disadvantaged backgrounds are able to access automated advice. At the same time, we would suggest that the FCA works to ensure that it supports the provision of financial advice through non-digital platforms, including hard copy mail.
Simplified Money Ltd	Lack of human involvement. Could be a positive for some, eg: those who are getting used to the internet and have lower levels of worry about issues such as security and/or just want an investment plan. It could, however, be a negative for others who are perhaps more worried about security, are less internet savvy and just want to chat things through - so human back up, albeit by phone and skype is likely to be a feature of some advice models (???cyborg???), particularly for the at retirement segment.
SK Financial	Low cost and convenience
South West Financial Planning	Trust
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	Refer to Q36
Sussex Independent Financial Advisers Ltd	That automated guidance should not be confused with advice. There is no or limited human interaction, and therefore detection of perhaps unarticulated concerns not possible
Swallow Financial Management LLP	No comment
Taurus Global Financial Advisers Ltd	Does it work and is it fast and simple.
The Minster Partnership llp	time and cost saving
Tom Orchard (Annetts & Orchard)	We previously were at this point with all the decision trees that were introduced by previous regulators, with CAT standards / stakeholder products popping out the end of a simple process. Simply automating that online will have the same, if not worse effect.
True Potential Wealth Management	Lack of understanding of the client when receiving automated advice would be my main concern.
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	Cost of provision Ease of delivery

Respondent	Q39: What do you consider to be the main consumer considerations relating to automated advice?
2plan wealth management Ltd (Chris Smallwood)	With regard to the affordable advice gap, the primary option would be to reduce the cost of providing advice. In order to do so, the problem of liabilities faced by financial advice firms and the associated costs has to be addressed together with a reduction in the cost of regulation. This involves the introduction of a longstop, reform of FOS and reform of the FSCS levies.
Abi Stidworthy	No comment
Active Wealth Ltd	Education and allowing firms to recruit easily. Provide training for new entrants. Some fines could be used to set up a college / school of excellence for financial advisers.
Advantage IFA Ltd	The biggest impact and quickest win would be as follows: Forget pensionwise and introduce a voucher system for a set value for a meeting with an IFA. IFAs agree to subscribe to scheme for which they do a first meeting and initial discussion with client for set value of voucher. Huge benefits are: 1> Consumer sees a qualified regulated adviser. 2> Easier for consumer to progress to full advice, less duplication of time and effort. 3> Advising firms have demand and less cost, more likely to increase numbers and increase supply of advice. 4> More consumers become exposed to advice, see the value and spread the word. 5> Quality of advice is monitored, consumer best outcomes arrived at and advice is provided not just guidance. 6> Biggest benefit is adviser will look at all areas, spot any overlap of objectives and be able advise accordingly, not just an isolated view on pensions.
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	Consumer education is a major factor - people feel that financial matters are complicated when many are just common sense. Financial education needs to start in school - teach budgeting and planning, help people to understand the cost of interest on borrowing, and how big a commitment saving for retirement is.
Aspire Online	I don’t really see what other types of advice can be given other than face to face, skype or tele advice and finally auto or robo advice.
AXA Wealth	Simplified regulation in order to encourage new advice providers to the market. Tiered regulatory requirements related to risk & complexity of products recommended. Review RDR adviser charging rules in relation to Vertically Integrated Firms.
Barra Gorman	No comment

Respondent	Q39: What do you consider to be the main consumer considerations relating to automated advice?
Berkeley Burke Group (Andrew Emery)	As I have already indicated above, particularly in light of auto-enrolment and pension flexibilities, there is a growing segment of people who need advice, which they are unable to access for various reasons, be them economic, due to trust or simply because they do not see the need for advice. This segment can be served by taking measures that increase the efficiency of advisory services, and help advisers reduce the financial and time cost borne by them.The following measures go some way to achieving this objective: A rules based regulator, be that the FCA or an alternative regulator.A regulatory sandbox which allow advisers to incorporate automated advice services, such as in providing simplified advice, and innovation without liability.Clarity as to how advisers deal with such clients, as insistent clients. Restructuring of the FSCS levy. A significant expense borne by advisers is that of prospecting for clients, such as purchasing leads. The suggestions set out above, and elaborated upon previously, could increase advisory industry efficiency and therefore, one hopes, help those who have no access to financial services, but have a need for advice. This increased demand should help increase efficiency of supply to those who can afford advice, and thus reduce the costs borne by the adviser of prospecting for customers. Safe Harbour In a nut shell, a regulatory Safe Harbour is where an adviser would be afforded limited or no liability if recommending approved products, such as simple products, or providing advice in accordance to certain pre-determined (check-list) guidelines. Proponents argue that Safe Harbour would encourage advisers to re-engage in advising on certain products and services currently deemed too high risk to advice on, and to clients who are equally deemed high risk. To date the FCA have argued that advice, in whatever form it???s provided, should always comply with the regulatory framework concerning any personal recommendation. Ergo, implementing a set of guidelines that, if followed, absolve the adviser of ongoing liability under Safe Harbour, constitutes a set of principles of good practice that should be adhered to irrespective. However, the FCA have made it far more difficult for advisers to interpret what these principles of good practice are, with the onset of outcomes based regulation, rather than rules based regulation. Nevertheless, there is room for introduction of Safe Harbour for specific scenarios, such as in respect of dealing with Insistent Clients or in respect of clients seeking to draw pensions flexibly, but have small pots. A black and white rules based regulator would provide a clear regulatory framework that is more transparent and more easily interpret-able by the adviser, rules which, if followed, should produce better client outcomes and mitigating the advisers exposure to redress, thus negating the very need for a Safe Harbour. The Permanently Excluded how to bridge an impossible gap Many consumers, since the commencement of Pension Wise, have been bounced between the guidance service and the regulated financial advisers to which the consumers have been sign posted to. Many of these people would evidently benefit from access to good financial advice AND guidance but are PERMANENTLY excluded from receiving private financial advice provision as they are deemed as not being profitable enough. It is this group of people who, irrespective of initiatives that increase adviser industry efficiency and lower an advisers enduring costs and liabilities, will be permanently excluded from receiving the advice they may need. A review is therefore needed to consider whether this permanently excluded segment can be served by non-profit organisations or via a State sponsored solution, perhaps a regulated advice arm of Pension Wise or the Money Advice Service. Measures designed to encourage State provision for those not served by private provision will allow private providers to concentrate all their efforts on those consumers that can afford or have access to the avenues of advice currently available. Objective: The objective is to develop a free Means Tested/Targeted State funded advice centres that provide a viable high quality output driven alternative to private provision. Prospective consumers are those that still occupy the advice gap, for instance the economically poor, once measures are implemented to help private advice providers serve those who have surplus income and a need for advice, but are currently not receiving advice. Although nationalised provision may be an additional State expense, it is importantly to weigh this against the perceived social cost of their being a large segment of people unserved but in need of some form of financial advice. This provision must be covered by the State, there should not be a case for private firms funding public advice initiatives. Here are some thoughts Scope of advice: Advice scope could be restricted simplified advice/automated advice. Or to certain areas of perceived high demand/need, such as pension planning.Alternatively delivery could be made via implementation of decision trees designed to simplify and streamline the advice process. Eligibility: This can be based upon household income (means tested) OR linked to having made sufficient National Insurance
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	No comment
Blue Scapes	No comment
BPH Wealth Management LLP	No comment
Brighton Financial Ltd	To pay for professional advice and, if that is not an option, to seek professional 'guidance' where possible.
Broad Wealth Management Ltd	No comment
Browning Financial Planning Ltd	no comment
Caleb Roberts Financial Management Ltd	Charities and jobcentres. Reintroduction of commission option for regular savers.
Caledonian Financial Management Ltd	No comment
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	Increase confidence and trust in the regulated advice market by increasing professional minimum standards; Increase availability of generic financial guidance (no personal recommendations) with limited liability on advisers; Focus on regulatory conduct of claims management firms to help reduce operational costs of advice firms; Review the PII market to assess the impact of decisions made by a relatively small number of underwriters are having on the regulated financial advice market.
Chattertons	No comment
Citygate Consulting Limited	The loss of commission and hence the loss of remuneration from those seeking to save, without existing wealth.
Close Brothers Asset Management	No comment
Combined financial Strategies ltd	

Respondent	Q39: What do you consider to be the main consumer considerations relating to automated advice?
Cranbourne Financial LLP	There probably is a need to provide automated advice for the part of the market that cannot access face-to-face advice economically. If the right level of regulation is applied then I expect investment will be made by providers in this space. The difficulty for the FCA will be pitching that regulation at a level that does not jeapordise existing vital face-to-face advice provision, while providing sufficient protection to consumers using the automated model.
D Shearer	No comment
Dean Robertson	no comment
Douglas Baillie Ltd	A new set of binding regulations and rules for advisers and consumers alike, that are fit for purpose, that are clear and unambiguous, with a right to seek clarification and a definitive answer from the regulator within a reasonable period of time. Please do ask the adviser community directly, including me, if you want any inputs or positive suggestions.
Entrust Financial Planners Ltd	No comment
Essential IFA	I firmly believe that the FCA needs to spend more resources on attracting advisers into the industry and for existing practices to expand by creating the environment.
Esteem Money Ltd	Encourage consumers to have an adviser that has come personally recommended by a friend.
Financial Foresight (NI) Ltd	New advisers and focused propositions.
Forward Plan IFA Ltd	Allow the facilitation of loans through contracts to pay for advice on regular contributions for investments and pensions. this to be a loan agreement between the consumer and provider. Better education in financial matters so that people understand that there is value in seeking advice and that in the long term costs are not prohibitive
Halebarns Financial Planning Ltd	providers and advisers reduce cots.
Hall Financial Planning LLP	No comment
Highclere Financial Services	1 More advisers. 2 Greater education of consumers 3 Acknowledgement from the Government that the current social security system is not feasible in the future and that the industry is willing and able to take up the baton and provide protection and retirement benefits. 4 Increase tax breaks, particularly for income protection which is the most needed but least purchased protection. Currently it receives no tax relief on premiums but the benefits are payable free of tax - the exact opposite of the pension system If income protection received a similar filip whereby tax relief at source is given on premiums then the take up would substantially increase to the benefit of society.
Intelligent Pensions	Incentivising advisers to incentivise consumers to save more.

Respondent	Q39: What do you consider to be the main consumer considerations relating to automated advice?
Investec Wealth & Investment	There are a number of elements to demonstrate the importance of financial advice: Demonstrating the value of professional financial advice.Using emotional arguments.Highlighting the complexity of what might seem straightforward. Highlighting the parallel pace and scale of industry and legislative change For those sitting in the advice gap to become engaged with the advice process there has to be a reduction in unit cost to make the value added by the advice process seem proportionate. For many suppliers in the financial advice market the cost of running a client is simply too high and therefore a barrier to advice for large segments of the population is automatically put in place. There will increasingly be providers who can reduce unit cost by the use of technology but without a significant change in the infrastructure that businesses have to place around the client advice process, it will not be possible to make significant reductions in unit cost. A further point to note is that much of the FAMR document talks about product. This demonstrates how polarised the managed advice market has become, as the face to face wealth advisory market has moved inexorably towards provision of advice and service, with a fee being charged for that, primarily on an initial and ongoing basis. While it is even less likely that the less wealthy segments of the market will be prepared to/could afford to pay a fee for advice, the idea of a product being involved in this process as a given is rather a throwback. Finally, the buying public, rather like the financial markets, like certainty and mistrust uncertainty. The regular changes and unnecessary complexity give consumers a further excuse to disengage and discourage advice firms for planning for the long term in terms of systems, personnel and market specialisation.
Iwan Jones	N/a
James Hay Partnership (Janet Morville-Smith)	To bring about true engagement, financial education is key and it needs to go hand in hand with standardised, simplified descriptors for what financial products do. People need to be empowered to make decisions based on guidance or advice but they need to understand the basics of financial products first, from compound interest to tax relief on pension contributions so that they understand the issues they face. In understanding those issues, they will value advice more and be prepared to pay a fee to ensure the best outcome for their long-term financial goals. The industry needs to make a concerted effort to use the language our customers use, not the jargon we always resort to. The suggestions presented in the Smarter Consumer Communications paper provide valuable food for thought for finding effective ways of counteracting some of the more damaging behavioural biases which also affect take up of advice. There is particularly a place for visual and audio representations of complex ideas through data visualisation, video or infographics. This could be especially helpful when starting from retirement goals and working back to solutions/products. The current default text-heavy approach clearly turns people off.
John Lord	No comment
Jonathan Davis Wealth Management LTD	No comment
Joslin Rhodes Lifestyle Financial Planning	No comment
Katy Master	No comment
Lemonade LLP	Reducing the cost of advice using technology and the other initiatives that you have identified.
Lighthouse Financial Advice	Cost of advice to the professionals and simplified legislative processes
Morgan Financial Ltd	Fund more charities to give free advice and support.
Morgans Ltd	Better consumer knowledge Better understanding of what advisers do and how they can help. If we can change the perception that advice is a product channel then this will go a long way to encouraging consumers to take advice. Of course the problem with this is whether consumers would pay for this service so either a voucher system or MAS will need to be an integral part of this. Triggers that prompt consumers to take a health-check and take action are needed.
Openwork Limited	Without greater certainty within the regulatory framework we are unwilling to deviate significantly from existing approaches due primarily to the advice risks we believe this would create. We welcome initiatives such as the regulatory sandbox and will continue to remain open minded and receptive to any opportunities that these create.
Park View FP Ltd	As above probably some type of simplified service but ultimately some Know Your Customer must be known before advice can be given in my opinion
PCM Asset Management Ltd	No advice Gap
Penguin	support innovation and help small firms with better guidance

Respondent	Q39: What do you consider to be the main consumer considerations relating to automated advice?
Polygon Financial Ltd	Affordablity and availablity.
Profile Financial Solutions	1. Increase consumer education so they are more likely to engage with advice 2. Focus on making telephone based advice acceptable and recognised as an alternative to traditional face to face models 3. Force historic providers to give access to existing pension information quickly and easily 4. Ideally make such existing pension information available on-line via a portal 5. Create a safe haven or safe prescribed process for at retirement de-cumulation advice
Prosperity Wealth Management Limited	We believe that compulsory financial education as part of the national curriculum for 16-18 year olds would radically transform consumer knowledge within a generation. The FCA should make this a core objective to close the advice gap and protect consumers. We view this as a proactive and long term approach to financial planning rather than acting retrospectively.
Protection & Investment Ltd	No comment
Richmond House Group	See previous answers Q16, Q22
Rob Coote	Reintroduction of commission for regular premium contracts such as Pensions and ISAs
Rowley Goodall Ltd	Via employers, see above
Royal Mail	The Keep Me Posted campaign would recommend that the FCA provides financial service providers with guidance on how their advice is communicated to consumers and that this includes guaranteeing that those without easy access to digital platforms are suitably catered for. Research conducted by London Economics on behalf of the Keep Me Posted campaign indicated that how information is received, by post or electronically, can have a big impact on people???s understanding and the choices they subsequently make. This research found that people are more likely to understand information and make better financial decisions when they receive information by post, rather than electronically. For example, people were more than twice as likely to correctly identify how much money was in their account if they received the statement by post (82% compared to 32% who receive statements online). With this in mind, we feel it is essential that information relating to rates is also made available through hard paper copy.
Simplified Money Ltd	No comment
SK Financial	Promote financial education is educational centres. Promote a "tips" clinic for those that want to have face to face contact.
South West Financial Planning	Allow direct sales forces to flourish again. Allow commissions with full disclosure to create savings habits with those with little resources. RDR ban on commissions destroyed what little of the savings culture this country had. Sales forces got young people to protect and save and build for the future.Only those with financial means can access advice appropriately at the younger age. Commission bad, fee good has failed to ensure consumers provide protection and savings for their future. These at the mature stage of life did fund commission based products and are financially better off now and afford the advisory fees.
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	No comment
Sussex Independent Financial Advisers Ltd	No comment
Swallow Financial Management LLP	REDUCE THE REGULATORY BURDEN!
Taurus Global Financial Advisers Ltd	Allow IFAs to adopt new technology to help those of small means to get a better start
The Minster Partnership llp	Good referral system to publicise the benefits of personal advice
Tom Orchard (Annetts & Orchard)	The only satisfactory outcome for consumers is more quality, regulated financial advisers combined with ability to transact lower value business with confidence that reduced compliance requirements will not be retrospectively judged.
True Potential Wealth Management	No comment

Respondent	Q39: What do you consider to be the main consumer considerations relating to automated advice?
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	Reduce the cost of delivering advice by implementing root & branch reform of regulation so that appropriate resources are brought to bear on those that most require it Products for the retail investment market should be licenced by the regulator & pay a product levy to fund the FSCS Consumers should understand that advice comes at a price but that price and the method of how it is actually paid should be determined by the client and adviser firm together and not a regulator
Wishart Wealth Management Ltd	Top quality financial advisers/planners can simply ignore the advice gap. Our role is not to help everyone who walks through our doors or can breathe on the glass. RDR introduced higher qualification requirements and a ban on advisers being paid commission on the financial products they sold. This has led to higher costs and pushed quality financial advice out of reach of the mass market. The role of the financial advice profession is to educate consumers about the benefits of proper financial planning and financial advice - but only to those whom can afford to pay for that advice. RDR has created an advice gap but that is for the policymakers and government to worry about not financial advisers/planners whom need to operate their business at a profit.

Respondent	Q40: What steps should we take to ensure that competition in the advice markets and related financial services markets is not distorted and works to deliver good consumer outcomes as a result of any proposed changes?
2plan wealth management Ltd (Chris Smallwood)	Previously covered
Abi Stidworthy	No comment
Active Wealth Ltd	No comment
Advantage IFA Ltd	Don't allow banks to authorise and regulate their own advisers. It will be a monumental mistake.
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	Competition is a natural process that is seen in all aspects of life and should not be suppressed in the way it has for financial services. For example if you buy a new car and 5 years later it breaks down you can't complain to the manufacturer or retailer. There are no grounds for redress if you bought a thirsty sports car because the dealer sold you a dream you can't afford. The current regulatory system has concentrated on "dumbing down" financial services rather than educating consumers, hence we have payday lenders who can get away with charging 1250% APR because they satisfy the requirement of the compliance declarations.
Aspire Online	Make sure that whoever gives advice, IFA's, banks, SJP, etc. all have to offer advise within the same parameters
AXA Wealth	The Vertically Integrated Firm model suffered as a result of the RDR adviser charging rules. As a result a number of the large Bancassurance firms left the market.As the review proposes to focus initially on those consumers that have some wealth and investable income but who arent receiving advice, then it should also reconsider how it will encourage mass market advisory firms back into the market.
Barra Gorman	Create a level playing field for all. Some large companies e.g. SJP charge commission disguised as fee within investment bond via a discontinuance charge - no explicit cost of advice. This is not in spirit of RDR aims.
Berkeley Burke Group (Andrew Emery)	For once, please do not use the "Good Consumer Outcomes" as an excuse to introduce unfair and discriminating legislation. The FCA "Good Consumer Outcome" method of regulation is a flawed concept that can ultimately only achieve one thing; the systematic destruction of the retail financial services industry as it currently stands.Almost all of the problems that our industry now faces are as a result of over-reaction by successive regulators who look like they have been more interested in preserving their own long-term prospects than ensuring that the industry remains "clean" and workable. As an industry we should be trying to re-educate the consumer to understand and accept, the act of responsibility for their own decisions and/or actions. The lead for this should come from the bodies who created this monster - the regulators and the government. The only body that appears to truly benefit from the last fifteen years of statutory regulation is the ambulance chasing and/or legal community. They have almost bled the financial services industry dry.
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	No comment
Blue Scapes	No comment
BPH Wealth Management LLP	No comment
Brighton Financial Ltd	Don't know.
Broad Wealth Management Ltd	No comment
Browning Financial Planning Ltd	no comment
Caleb Roberts Financial Management Ltd	Monitor it as see by how much regular savings increases due to this.
Caledonian Financial Management Ltd	No comment
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	Ensure that the KYC requirements for full regulated financial advice mirrors both human and automated advice models.
Chattertons	No comment
Citygate Consulting Limited	There is a big argument to say that you shouldn't intervene to distort the completion, that should be left to market forces. I think the rise in professional standards is great and I personally look forward to the day that advisers are seen as the same standing as an accountant or solicitor. I think there needs to be more done to drive clients to advice, more good news stories of good advice and payment made to advisers to promote financial education when setting up pension schemes for Auto Enrolment. I think if we can educate the general public a little more, this may not lead to more DIY financial advice, but a greater appreciation of professional advisers. I would love nothing more than to set up in a manner similar to a GP for perhaps 1 day per week, with a flow of financially "unwell" people visiting me. I would however want to be paid a salary that relates to the value given akin to the financial model GPs have.
Close Brothers Asset Management	No comment
Combined financial Strategies ltd	Define exactly what regulation wants from the advice process. Cut levies on regulated advisory firms. FSCS Levy to be product based. Reduce capital adequacy requirements. Regulated the "Advice" industry separate from financial products.

Respondent	Q40: What steps should we take to ensure that competition in the advice markets and related financial services markets is not distorted and works to deliver good consumer outcomes as a result of any proposed changes?
Cranbourne Financial LLP	FCA needs to ensure it does not regulate the automated advice market so lightly that most advice migrates to that model (because it can be provided much more cheaply), which is unlikely to be able to address ??complex advice needs, thus damaging the market for face-to-face advice. This would be detrimental to those consumers who need advice appropriate for their complex requirements.
D Shearer	Everyone uses the same software which is regularly updated and supported
Dean Robertson	no comment
Douglas Baillie Ltd	1. As above: a clear and unambiguous set of rules, that apply equally to everyone. 2. Take punitive action and make it a criminal offence, fully and rigourously enforced, for any person to give investment advice unless authorised to do so by the Regulator. This action would massively stamp ot miss-selling and other scams.
Entrust Financial Planners Ltd	No comment
Essential IFA	The FCA needs to concentrate on providing an environment that is economically sound for advice givers to operate as often the regulator concentrates on consumer issues forgetting that the industry does have to make a profit
Esteem Money Ltd	Don't know
Financial Foresight (NI) Ltd	Long stop and FSCS levied wholly to providers.
Forward Plan IFA Ltd	Firms to give a clear definition of their status, which needs to be amended, and that all firms have to have the same options for how they charge. it is wrong for one type of firm to be allowed to receive a commission, or loan based fee (as described above), and yet others are not permitted to use this. Also if simplified advice and minimally qualified advisers are allowed, then all firms providing this advice can offer this type of service.
Halebarns Financial Planning Ltd	Cap charges and only alow them to be increased by CPI
Hall Financial Planning LLP	No comment
Highclere Financial Services	Regulation is the main distorter, as seen by depolarisation, RDR and other antics. Markets are best left to themselves
Intelligent Pensions	Clear and unambiguous guidance, the promotion and encouragement of 'specific professional advice' as a lower cost regulated advice model, while retaining regulatory protection for consumers.
Investec Wealth & Investment	No comment
Iwan Jones	Don't know
James Hay Partnership (Janet Morville-Smith)	Separating advice from product, whether wrapper or investment solution, will be key. However the move from a percentage of assets to be transacted to a monetary fee for the advice will probably increase the problem, not solve it. Separating adviser fees for advice, implementation and ongoing services would help
John Lord	No comment
Jonathan Davis Wealth Management LTD	more focus on big banks - 80/20 principle
Joslin Rhodes Lifestyle Financial Planning	Not allow companies who manufacture products to factor defacto sales commission into their ongoing management costs and perpetuate the myth to clients that advice is 'free'.
Katy Master	No comment
Lemonade LLP	No comments
Lighthouse Financial Advice	review and deal with each avenue of advice equally
Morgan Financial Ltd	Don't know. The truth is there are not enough advisers at any level including charities to service those in need.
Morgans Ltd	No comment
Openwork Limited	Covered in previous responses.

Respondent	Q40: What steps should we take to ensure that competition in the advice markets and related financial services markets is not distorted and works to deliver good consumer outcomes as a result of any proposed changes?
Park View FP Ltd	Surely the bosses of larger organisations and smaller organisations should be accountable for the behaviour and culture of the firm they lead. So if from the top you have the correct culture this will lead to better outcomes for consumers. In the past some terrible behaviours have taken place and consumers have been dealt with in a criminal manner and the bosses just walk away and start again. If they are held responsible then this would create better cultures in firms and better outcomes for clients.
PCM Asset Management Ltd	Accept and implement a 15 year Long Stop. Restructure the funding of the FSCS (Product Levy, would be my recommendation) Ban UCITS altogether, from being included in advice. If firms arrange it, and it goes wrong. suspend the individuals concerned
Penguin	look at the consolidators - which you have recently announced - and their business models - which is ultimately churning Stop St James Place, and other similar firms, from flouting the RDR rules around fees and commissions introduce a long stop to help advisers feel that they can retire without fear of ambulance chasers or future reviews being announced
Polygon Financial Ltd	Feel the large firm proffering restricted advice represent unfair competion to small independent firms giving intergrated financial advice. Indeed not comfortable with restricted advisors per se including mortgage brokers.
Profile Financial Solutions	No comment
Prosperity Wealth Management Limited	The FCA should ensure that regulatory costs do not further reduce the number of advisory firms or act as a disincentive for new companies to enter the market. In addition the FCA must be acutely aware of the rationalisation currently taking place within the large insurance company sector which could further act as a distortion to the market generally. Similarly there is a need to be aware of mergers within the fund management sector.
Protection & Investment Ltd	No comment
Richmond House Group	The existing regulatory regime has already distorted the market and created the advice gap. Less is more, back off and let the market provide what the consumers want rather than both advisers and consumers being told what is best for them by FCA.
Rob Coote	By doing surveys like this and continue to the trade bodies who get feedback from their members who are in contact with the consumers
Rowley Goodall Ltd	No comment
Royal Mail	Focusing on the Keep Me Posted campaigns specific area of concern, we would recommend that in order to ensure consistency in the way in which information is shared by those providing financial advice, which the FCA provides guidance around the mediums through which this advice is provided to consumers. In the event that this is an area in which the FCA deems it unnecessary to implement immediate regulation, we would urge that this be revisited after a period of time, so that the impact of any new settlement can be properly assessed.
Simplified Money Ltd	No comment
SK Financial	Promote financial education is educational centres. Promote a "tips" clinic for those that want to have face to face contact.
South West Financial Planning	Control the increasing regulation. Ensure it Is proportionate and relevant.
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	No comment
Sussex Independent Financial Advisers Ltd	No comment
Swallow Financial Management LLP	Since RDR competition has shrunk, firms have merged products across providers have become standardised, product innovation has evaporated, so in answer!
Taurus Global Financial Advisers Ltd	Reduce fees and interim levies, which hurts all IFAs in the market
The Minster Partnership llp	Strong compliance systems in place and openness in our business offer.
Tom Orchard (Annetts & Orchard)	The regulator needs to control the situation, not let large providers run amok across consumers as we witnessed with the poor advice from the bank and some of the larger tied (now called restricted by provider) companies. These large firms with vertically integrated models have deeper pockets and accept regulatory fines as part of the business. These never go far enough to rectify the damage they do to individual consumers or larger society as a whole. A selection of trusted firms, well versed in the requirements with an independent culture should be encouraged and rewarded to pioneer programs to encourage those less inclined or able to enter the regulated financial advice arena, both as a consumer and also hopefully some as a career. This will be the closest to perfection we can get to deliver the best consumer outcomes, on individual and on societal levels. Hopefully these new entrants to the market will be younger, higher percentages of females (to address current imbalance) and also from some minority groups, as the public generally is more comfortable, accepting and trusting of people they feel are most like themselves.
True Potential Wealth Management	I feel that clients deserve good quality advice, I prefer the face to face approach, if we go down the automated option clients could only get advice in certain areas and not holistic advice that they deserve, yes this may cost them ultimately more money but over the longer term they would receive better advice feel more protected and also have someone to hand to review/answer questions. I feel that the FCA needs to have a common sense approach which generally is the case however this needs to be enforced within compliance departments which is and will be much harder, I am not sure how you can change this.
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	If regulation is efficient & not burdensome, the good firms will prosper to the benefit of all consumers

Respondent	Q40: What steps should we take to ensure that competition in the advice markets and related financial services markets is not distorted and works to deliver good consumer outcomes as a result of any proposed changes?
Wishart Wealth Management Ltd	Post RDR advice firms (IFAs) have become more business like and most now know what they do, for whom as well as what to charge to make a profit. This is the free market in operation. Minimum investment amounts and fees have come in. Thousands of consumers have been removed from client banks as they are no longer profitable to serve.Using legal services as an analogy, if I was to go to Court on an important matter, I have choices (a) represent myself (free), (b) hire a relatively cheap newly qualified lawyer or sole trader, (c) hire a more expensive Advocate or (d) spend tens of thousands of ??s on Queen's Council (QC). If I can't afford (b),(c) or (d) that is my own problem. Life is not perfect./ Not everyone can have (or afford) the best advice.

Respondent	Q41: What steps should we take to ensure that the quality and standard of advice is appropriate as a result of any proposed changes?
2plan wealth management Ltd (Chris Smallwood)	Previously covered
Abi Stidworthy	No comment
Active Wealth Ltd	Create a rule book!
Advantage IFA Ltd	Keep SPS requirements. With voucher system you could have mystery shoppers.
Alison D M Segerman	No comment
Amar Financial Services	No comment
Anne Rodger	No comment
Apex CB Financial Planning Ltd	No comment
Aspire Online	When considering making changes or when you see an area is not working for e.g. stakeholder pensions and JISA's talk to advisers, providers and the public in the big enough numbers to find out why an area is failing
AXA Wealth	Where a personal recommendation takes place, suitability requirement should remain in place but should be tiered according to the risk & complexity. The FCA has previously confirmed in its recent guidance that the current rules already allow for this and as a result a number of firms have or are considering re-entering the personal recommendation market. However, to provide absolute clarity and confidence the rules should be amended to reflect the difference in product complexity and risk.
Barra Gorman	Proactive action against scammers and promotion of high risk schemes to public as this causes lack of trust. Public mostly do not see difference in these schemes and standard unit trust or the unregulated adviser and regulated adviser.
Berkeley Burke Group (Andrew Emery)	See questions 1 to 40 inclusive and use the 1,000's of years worth of experience that is at your fingertips instead of trying to suppress it. Although not perfect, the UK had the best financial services sector for many years. Unfortunately, to much regulatory emphasis on pleasing the consumer at all costs has almost made the industry unworkable. The FCA needs to act very quickly to save the UK financial services industry from dying from wounds that have been inflicted by those in place to look after us - the FCA!
Berkeley Burke Group (Tony Durant)	No comment
Blevins Franks Financial Management	Monitor the complaints received by firms and FOS for the first three years, and whether liability on the FSCS has also changed.
Blue Scapes	No comment
BPH Wealth Management LLP	No comment
Brighton Financial Ltd	Monitoring outcomes. Continued consumer feedback / surveys.
Broad Wealth Management Ltd	No comment
Browning Financial Planning Ltd	no comment
Caleb Roberts Financial Management Ltd	As now.
Caledonian Financial Management Ltd	No comment
Carolyn Callanan	No comment
Chartered Financial Management (UK) Ltd	Increase regulated financial advice minimum professional standards to level 6.
Chattertons	As previously mentioned a two tier system should be installed. Advisers are independent and work in the best interest of the client, full client care provision should be adhered to and I would encourage the FCA to regard the client care provisions in the SRA handbook as a model for this behaviour. As regards the low-cost model a brokerage service should be enabled where firms operate with very little training - perhaps a QCF2 specific unit; specific to the area being brokered. This would require that the individual service provided merely ensure that the investment or contract brokered is appropriate for the client. If it isn't then the client should be referred to an adviser.
Citygate Consulting Limited	I envisage the qualifications rising every few years and I think there is nothing wrong with advisers having to be current chartered level just to stay in the industry. I think it is dangerous to let an adviser "specialise" in one area, as financial advise should be holistic. This may develop into a system similar to the NHS, whereby people see a general practitioner who refers to other areas of specialism, but fundamentally, the GP should drive the entire system. There shouldn't ever be an equivalent A&E, although perhaps the FSCS and FOS is just that, the place those in trauma go to!
Close Brothers Asset Management	No comment
Combined financial Strategies ltd	Look at the complaints register and all the other data we are required to provide you with. If that it sufficient then you have no hope in ever regulating the industry effectively.

Respondent	Q41: What steps should we take to ensure that the quality and standard of advice is appropriate as a result of any proposed changes?
Cranbourne Financial LLP	FCA will have to ensure you check the advice given under automated model in the same rigorous way and to the same standard as F to F advice. Presumably you will need to automate this checking so it can be done cost effectively
D Shearer	Training of para-planners that would provide the advice.
Dean Robertson	no comment
Douglas Baillie Ltd	As above: Create an entirely new set of rules in conjunction with the regulator with strong and relevant input from a wide spectrum of the regulated adviser comminity. I would behappy to become a member of, or chair any such project team that you may want to form in early course.
Entrust Financial Planners Ltd	No comment
Essential IFA	I would like to see more examples of best practice and clearer guidance of best practice that actually makes operational sense rather than a long meaningless directives that seem to be produced by bureaucrats that have little or no knowledge of giving day to day financial advice.
Esteem Money Ltd	More thematic reviews?
Financial Foresight (NI) Ltd	Transparency.
Forward Plan IFA Ltd	Not to allow simplified advice or automated advice
Halebarns Financial Planning Ltd	Continuous advertising to keep advice in he forefront of consumers minds
Hall Financial Planning LLP	No comment
Highclere Financial Services	Less is more. It applies in all fields and regulation is not exempt. It takes a brave captain to stand down half his army but that is exactly what should be done at Canary Wharf. Professional bodies such as the PFS are perfectly positioned to self-regulate members with a consequent lower need for the focused and thematic regulation that the industry has endured, and paid handsomely for, over the past 15 years
Intelligent Pensions	1. Compulsory written advice (including by e-mail) as a follow on to a simplified or focused advice session('specific professional advice'). 2. A requirement that firms using simplified/focused advice models record this using their online returns, confirming the number of simplified/focused advice sessions undertaken. 3. Spot checks carried out by requesting a copy of the report and detailing the purpose and result of the client consultation to check that guidance has been followed.
Investec Wealth & Investment	Providing access to financial education and advice for the disenfranchised is paramount. This should not be at the expense of a dilution of consumer protection, standards or trust in the industry. That would affect the integrity of the industry and the markets as a whole and be seen as a retrograde step denigrating the whole industry where so much progress has been in terms of professionalism and qualification (admittedly at the higher end). While consumers want simplicity, access, transparency and low cost, they also want integrity, successful outcome and in todays world, someone to blame if things go wrong.
Iwan Jones	It is accessible to everyone
James Hay Partnership (Janet Morville-Smith)	The qualification requirements have led to a significant upskilling of the industry. However in doing so, it has polarised the market with high net worth individuals benefiting from accessing upskilled financial advisers while the rest are priced out of advice. A further clarification could be beneficial, for example would someone know that seeking retirement planning advice should come from a pension specialist, a chartered planner or an investment adviser? Providing categories that reflect the client objectives (retirement, buying a home etc) rather than an adviser???s level of qualification could help make at least one aspect of the advice market clearer.
John Lord	No comment
Jonathan Davis Wealth Management LTD	No comment
Joslin Rhodes Lifestyle Financial Planning	Insist on Independent Financial Adviser. Preferably Chartered.
Katy Master	No comment
Lemonade LLP	No comments
Lighthouse Financial Advice	nothing more than you do at present
Morgan Financial Ltd	You cannot make sure advice is of sufficient quality. With so many people involved in the advice process from the consumer, regulator, advisor to those that handle complaints it is clear appropriate advice is subjective. I get the feeling that the FCA will never by happy with the fact that financial advice is as commercial an enterprise as accountancy or the legal profession.

Respondent	Q41: What steps should we take to ensure that the quality and standard of advice is appropriate as a result of any proposed changes?
Morgans Ltd	This is paramount. We need to ensure that any changes are watertight so they are not exploited and we again see trust in financial services destroyed.
Openwork Limited	Covered in previous responses.
Park View FP Ltd	1. The FCA should be more proactive and listen to advisers more especially around scams and poor practice. If the FCA threw real resource at a proactive department to stop scams and criminal behaviour in its tracks before problems arose this would stop so much harm to consumers, bad press for both regulators and advisers and far less money from advice firms to pay towards levys. It is so simple and would be so effective that the FCA must set this up properly. I WOULD LOVE THE OPPORTUNITY TO COME AND TALK DIERCT TO THE FCA ABOUT WHAT I HAVE BRIEFLY DESCRIBED ABOVE AND EXPLAIN HOW IT COULD WORK AND BE SO EFFECTIVE. PLEASE GIVE ME THAT OPPORTUNITY!!
PCM Asset Management Ltd	Segment the firms who wish to operate in a particular 'Advice Route' such as automated advice, and treat them /charge them accordingly for the cost of whatever the process is, in FCA delivering it. Don't charge the traditional firms, who just want to get on and provide traditional advice face to face.
Penguin	Level 6 qualifications More access to benchmark accreditations
Polygon Financial Ltd	Look athe individual client files.
Profile Financial Solutions	No comment
Prosperity Wealth Management Limited	The regulator has always endeavoured to ensure that quality and standards are improved and maintained and on the whole the advice industry has responded positively to these changes. We see no reason why this should not continue.
Protection & Investment Ltd	No comment
Richmond House Group	The quality of advice is far better than you think it is. The size of the FSCS is due to a lack of effectiveness of the FCA in policing, not due to hoards of advisers ripping people off. There will always be rogues in every walk of life but the overwhelming majority of advisers provide excellent and conscientious advice to clients and deserve to be treated as professionals by the regulatory regime.
Rob Coote	Consumer feedback
Rowley Goodall Ltd	No comment
Royal Mail	In the event that the FCA introduces regulatory changes relating to the way in which financial advice is provided, the Keep Me Posted would recommend that it seeks to directly consult with those consumers who have limited access to digital platforms. As highlighted above, these consumers include pensioners, those with limited financial resources and the disabled. Consequently these consumers are frequently those most in need of effective advice on how to organise their financial affairs and yet can often be constrained by a lack of access to digital platforms which have proliferated in recent years. For this reason, the campaign would recommend ongoing engagement with these groups, tracking the effectiveness of any new regulations, to ensure that these groups are not marginalised and can benefit from easy access to essential advice and guidance.
Simplified Money Ltd	Allowing a new level of simplified advice with some safe harbour and recognition of the lower risks does not mean the advice is lower quality. It just means recognition that different people have different needs and, for straightforward needs, quicker and more formulated analysis can result in good advice. Qualifications, training and ongoing oversight are still required.
SK Financial	Qualifications is a good measure. So too is experience. I also think that the way that people are remunerated for their work is also a
South West Financial Planning	Ensure good standard of qualifications of the advisory community.
Strategic Investment Solutions Ltd (Chris Kilner)	No comment
Strategic Solutions (Michael King)	No comment
Sussex Independent Financial Advisers Ltd	no comment
Swallow Financial Management LLP	No comment
Taurus Global Financial Advisers Ltd	No comment
The Minster Partnership llp	Continued strong compliance

Respondent	Q41: What steps should we take to ensure that the quality and standard of advice is appropriate as a result of any proposed changes?
Tom Orchard (Annetts & Orchard)	If we will only accept utopian perfection in a model in an attempt to solve the solution, we must accept that we will fail. If it were that simple, we would already be doing it. It is no use to anyone if consumer groups (often with vested interest) and none of whom are personally affected by these issues, demand we find nirvana with an infallible outcome. What we must do is take steps that move us forward and give those we challenge to do that some comfort and confidence they wont be hung out to dry. We have to understand that, like everything else in the world, it wont be 100%. But the alternative is the downward spiral we are currently on, fewer advisers servicing fewer consumers, who end up getting no advice, because they are not profitable, who then make poorer and poorer decisions and become less and less likely to be advised. Whilst fewer and fewer members of the public understand the role of a qualified, regulated financial adviser as they arent taught in schools and they dont see one in their homes, so adviser numbers decline further as they dont consider it as a viable career, as they dont even know it exists.
True Potential Wealth Management	Don't let banks sign off advisers for advice within there own regime, ensure suitable qualifications obtained, ensure that the general public understand that advisers are there to assist them. ensure firms keep a track on advice through spread of business. tighter regulation on firms that only offer protection only advice through the phone for example and have 19 year old call centre people selling them a policy that they may not require.
Waghorn	No comment
Whiting & Partners Wealth Management Ltd	see above
Wishart Wealth Management Ltd	If there are to be new entrants in the D2C market then the FCA should set out clear guidelines as to what is an acceptable method of operating - some minimum standards. The fact D2C (direct to consumer) services can operate on the 'let buyer beware' principle (as no advice being offered - just a Best Buy 150 funds list) does mean that a consumer can destroy their wealth online at the flick of a switch - as is their choice.