

# **PSIG Future Strategy Consultation: Industry Response**

**20<sup>th</sup> December 2024**

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## 1. Executive Summary

This paper follows the publication of the Pension Scams Industry Group (PSIG) industry consultation which was issued in April and is shown in full in Appendix 1. Together with my colleagues on the PSIG Technical Group (listed in Appendix 2), we have now reviewed the feedback from the responses we received, and our conclusions and agreed approach are outlined in the paper.

We are grateful to those who responded to our consultation and welcome the warm words of appreciation for our work.

The key aspects of the feedback were as follows:

1. The entirely voluntary commitment provided by the PSIG Technical Group to produce and update the Code of Good Practice is recognised, applauded and appreciated.
2. The Code is used and valued across the industry and its detailed good practice has helped protect countless people from scams.
3. Most respondents considered that if PSIG's work should not continue (especially without replacement), there would be a risk that scam prevention processes would become fragmented over time, to the detriment of member safety.
4. In addition, the merits of our industry intelligence forum (PSIF) were stressed by virtually all respondents.
5. The ask from industry was for even more from PSIG with increased speed of updates to the Code, an improved, dynamic and more informative website as well as the lobbying of government and regulators and a focus on the wider fraud arena rather than a concentration on pension transfers being common themes.
6. There was limited and in some cases no support for an accreditation scheme provided by PSIG, mentioning that the Scams Pledge was sufficient.
7. Some felt that the guidance provided in the Code would be more appropriately provided by a regulator rather than by an industry group.
8. Although our extensive efforts to try to ensure a fairer tax treatment of pension liberation victims were appreciated, it was felt that victim support should not be an area of focus for the group going forward as there were many other organisations already operating in this space, albeit in a disjointed fashion.
9. A number of respondents indicated their preference that there should be no charge in respect of their attendance at the PSIF.
10. Many respondents called for a detailed menu of services from PSIG before they could consider a request for funding.

In summary, while the industry highly values our work and the huge contribution we have made to scam prevention, the time is right to consider our future strategy. It is clear that before any industry funding can be considered, the industry would want details on what areas we would focus on and what services we would provide. The industry generally would like us to keep a focus on scams and fraud prevention, but in a more dynamic way than we can do at present, especially while we wait for anticipated regulatory changes. This is understandable but, without income in the short to medium term, PSIG will not be able to expand the important work it already carries out nor fund its own governance and administration.

PSIG has already achieved our initial objectives many times over, and there are now a number of sources of guidance, including from DWP and both regulators. Our short to medium-term aim is to publish a further update to the Code of Good Practice. This update will be undertaken on a voluntary basis as usual and published once the anticipated amendments to the Occupational and Personal Pension Schemes (Conditions for Transfers) Regulations 2021 are laid by the Department for Work and Pensions (DWP).

Any update to the Code is however subject to early open engagement with DWP on the content of the regulations to ensure we can publish an aligned Code alongside the regulatory changes, the endorsement of the Code by the Pensions Regulator (TPR), the support of the Financial Conduct Authority (FCA) and Pensions Ombudsman (TPO). It is likely that the anticipated regulations may be delayed because of other government priorities, so PSIG may instead produce further guidance to help the industry in the short term, especially as

so many respondents stressed the need for updated material. This refresh would be subject to the same conditions as a further edition of the Code itself.

During the first half of 2025, PSIG will consider its objectives in the light of the various requests of the industry and will return to the industry with proposals for consideration. In the meantime, we will scale down our privately-borne governance costs, including our Companies House registration as a Community Interest Company, our data protection registration and our website development.

## 2. Consultation Responses

24 responses to our consultation were received from firms, organisations and individuals across industry. We are grateful for the time taken to submit comprehensive responses. The respondents are listed in Appendix 3 and the key responses are detailed in the table below:

	<b>Question</b>	<b>Industry Response</b>
1	<b>Do you use the PSIG Code of Good Practice as part of your transfer due diligence processes?</b>	86% replied yes. The Code has improved industry standards. Many respondents use the Code as the basis of their own bespoke processes. In view of capacity constraints, some organisations do not telephone a member - a Code standard. Some organisations rely less on the Code following the 2021 regulations and have developed their own approach.
2	<b>Does the PSIG Code of Good Practice add value to your business proposition?</b>	It is an invaluable standard to enhance member protection. Value reduces where scam threats evolve but the Code hasn't. 2021 regulations introduced uncertainty, so more legal advice needed as the Code is not definitive.
3	<b>What improvements could be made to the PSIG Code of Good Practice?</b>	Suggestions included more frequent updates and case studies, endorsement by regulators and perhaps a kite mark. Some suggested a modular approach to suit different practitioners and explicit guidance on clean lists. A "Live" version of the Code online would be useful. The Code would be better if it was a "one stop shop" linking guidance and administration processes and clear examples setting out what e.g. "unclear or high" means in practice. Guidance on identifying and supporting vulnerable customers would be useful.
4	<b>Do you have any other comments on the PSIG Code of Good Practice, other than in relation to technical content?</b>	Explicit support from regulators and ombudsmen would give greater confidence to users. The Code is a bedrock which needs to be retained. It is essential for trustees of small schemes who have less exposure to scams.
5	<b>Do you participate in in the Pension Scams Industry Forum?</b>	75% responded yes, with some cascading learning to others.
6	<b>If you participate in the Pension Scams Industry Forum, does this add value to your business proposition?</b>	Majority of users find it incredibly useful as there is no other way to hear about activity that indicates a potential scam.
7	<b>What improvements could be made to the Pension Scams Industry Forum?</b>	Broader involvement of SIPP/SSAS, regulators and law enforcement. Disappointing to see lack of action by regulators and law enforcement against bodies of concern reported by PSIF leading to same bad actors coming up time after time. A centralised intelligence database or written notes would be welcomed by many as keeping own internal records time consuming and would avoid repetition. Periodic seminars would be beneficial. Format could be improved to accommodate the growing number of members. A deeper dive into some discussions would help, although risk of overstepping legal boundaries. PSIF should broaden to include other areas of fraud.
8	<b>Do you have any other comments on the Pension Scams Industry Forum?</b>	Majority prefer PSIF to continue as it benefits the whole industry. PSIF, PSIG and PSAG should be more joined up. Membership should be more tightly controlled as some members are seen in practice to act in ways inconsistent with PSIG principles. Because the discussions in the forum have no legal standing, it can be difficult for members to use the information without fear of repercussions. If HMRC and regulators had a more robust response to enquiries on scheme/adviser status, PSIF would not be so essential.

9	<b>Are you aware of PSIG's participation in the Pension Scams Action Group?</b>	90% of respondents aware.
10	<b>Do you have any comments on PSIG's participation in the Pension Scams Action Group?</b>	Welcome PSIG's respected voice in PSAG to ensure industry input to pragmatic regulation. One respondent thought that other organisations should take the lead on PSAG activities. Regular updates on activity would help, e.g. at PSIF meetings. Could better represent SIPP/SSAS market.
11	<b>Are you aware of the work undertaken by PSIG to increase awareness of pension scams?</b>	90% yes. Industry aware rather than general public. Could provide statistics and information on things like transfer times, referrals to MoneyHelper and what works well in practice. Need to better inform advisers and members on scam checks to avoid them pressing for fast transfers.
12	<b>Should PSIG increase, reduce or stop working to increase awareness of pension scams?</b>	Critical. Needs to increase. Should expand to raising awareness of AI and digital/social media fraud in pensions. Web pages should be a living document and dynamic. PSIG widely-respected so should focus on helping the industry and let others be the face of scam campaigns. PSIG should increase use of forums and webinars.
13	<b>What should any periodic PSIG report contain?</b>	Emerging issues, trends and developments in scams and legislative/regulatory changes however schemes and providers should not report to PSIG. Scale of problems and what happens to perpetrators. Quarterly reporting on trends and annual report on PSIG activities. Industry surveys. Naming and shaming of suspicious operators. Perhaps PSIF could do the reporting? Partner with other industry bodies to share research
14	<b>How can PSIG most effectively share legislative and regulatory expertise?</b>	Website or social media channels, email newsletters. PSIG has more experience and capability than others. Offshore capability as many members retire abroad. More influence in setting Policy and Regulations. Respond to industry questions on website. Keep Code up-to-date. All PSIG articles and blogs should be searchable on website. Thorough industry consultation on guidance. PSIG website as a hub for relevant information. Lobby government to prosecute scams, change legislation to allow data sharing on scams. Online training tools.
15	<b>Which methods of knowledge sharing would you use?</b>	Largely as per question 14
16	<b>Should PSIG be members of relevant industry bodies?</b>	Generally, yes with focus on the sharing of information and real issues with those who can facilitate changes. Already some overlap with members of PSIG also members of other bodies and vice versa, so that may be sufficient.
17	<b>What should PSIG be doing to support pension scam victims?</b>	Work being done by PSIG is laudable, but it should not be down to PSIG to do this. PSIG should keep involved in change at strategic level with government and regulators who should be held to account. PSIG's focus should be scam prevention and industry information. Too many organisations doing little bits - should be streamlined.
18	<b>Is there anything else which PSIG should be more involved with?</b>	Not really. Focus on scam prevention. Evolve with scams – wider pension fraud e.g. crime where drawdown funds being targeted by scammers.
19	<b>Should PSIG wind up?</b>	No, PSIG is the body most in touch and best placed to facilitate change and influence government and regulators. Evolution rather than extinction. If it winds up, the work should be passed to a regulator or other body. PSIG has been very good in shouting "fire" but despite its best efforts has failed to put out the fires – it should actively push for resolution of the issues.
20	<b>If PSIG wound up, what would be the impact (if any) on pension scheme members and pension practitioners?</b>	Loss of consistent multi-sector approach and intelligence sharing could mean consumer detriment and loss of expertise to the industry in the longer term and probably push up operational costs. Want PSIF to continue and Code maintenance could transfer to TPR. When PSIG started, there was no regulation in place. PSIG succeeded in creating a standard and getting regulations, but that only plugged the industry side of the gap, not the consumer one. Could be argued that existence of PSIG has sheltered regulatory bodies. Dashboard could increase scams, so some organisation needs to be responsible for combating scams involving pensions.

21	<b>PSIG Funding Options?</b>	Define role of PSIG and future plans first. Funding on top of existing levies is hard to accept. Membership model but restrict to organisations with no concerns over their practices. Operational costs covered by Fraud Compensation Fund (FCF) levy? Impartiality remains key. Important the outputs are free to use. Charitable status to secure donations from industry? Collaborative model? Be absorbed into another body?
22	<b>Other Comments?</b>	PSIG was a game changer for the industry in 2015. It has set up the industry to be able to address scams, has driven legislative change and TPR guidance. Need to keep ahead of evolving scams and perhaps PSIG could support regulators in this area? PSIG does a lot, so perhaps “less could be more”? Code was helpful in the early years, but needs to be regularly updated. PSIG should be more forward-looking and strategic. Given the evolving nature of financial fraud affecting not just pensions, perhaps PSIG could help bring together learning from digital/banking fraud to the pensions arena.

### 3. Conclusions

PSIG has to some extent been a victim of its own success as a voluntary body undertaking regulatory type functions. The number of responses we received is disappointing when contrasted with the 80-90 firms and organisations which attend the PSIF forums each month. However, those who responded gave very detailed and helpful feedback.

We also have some sympathy with the view that ownership of the Code and the guidance within it should rest with a regulator rather than with a voluntary industry group, although some respondents stressed the need for independence. Furthermore, the Pensions Regulator and DWP now provide their own guidance, and PSIG was originally established to provide help when nothing else was available.

We also recognise that our current website has limited functionality, but we are unwilling to increase our costs at this time.

There remains a real desire from the Group to fully update the Code from the current Interim Guide as soon as the anticipated amendments to the Statutory Transfer Regulations are published by the DWP. It is expected that this will give us the opportunity to provide clear best practice for industry rather than the compromise position outlined in the Interim Guide. The caveat to such commitment though is that a full Code update is a significant undertaking, and PSIG would want to ensure that the final deliverable will both be valued by industry and will have the meaningful support of the DWP, TPR, FCA and TPO. We are all very grateful for the support of DWP for our Interim Guidance and that TPO has helpfully referred to the Code several times in determinations).

### 4. Way Forward

In terms of the way forward, we have agreed the following:

1. PSIG will liaise with DWP on the content and timing of the anticipated revised transfer regulations.
2. PSIG will continue on a voluntary basis to produce a final version the Code of Good Practice once the amendments to the Statutory Transfer Regulations are published. Should the publication of the revised transfer regulations seem likely to be delayed beyond mid-2025, PSIG will take the opportunity to refresh our guidance reminding users of how to deal with transfers in the most efficient and risk-controlled way.
3. Publication of another version of the Code or guidance will be conditional on the explicit support of DWP, TPR, FCA and TPO, so PSIG will work to secure that support. This will be essential to give the industry confidence that operating to good practice standards set out by PSIG in the absence of updated regulations will protect them in the event of a spurious complaint by a member or their representative in future.
4. During the first half of 2025, PSIG will consider its objectives in the light of the various requests of the industry and will return to the industry with proposals for consideration. In the meantime, we will

scale down our privately-borne governance costs, including our Companies House registration as a Community Interest Company and our website development.

## **Appendix 1 – PSIG Industry Consultation**

# **Pension Scams Industry Group – Evolution or Extinction?**

### **Introduction**

The Pension Scams Industry Group (PSIG) is a voluntary body created by the pensions industry to combat pension scams. PSIG is primarily focused on sharing good practice on how to stop these scams.

PSIG set about defining how we could protect pension members from pension scams, resulting in the 2015 publication of our first Code of Good Practice. Throughout several updates, this Code has remained the industry standard on combating pension scams.

PSIG members bring a range of skills, expertise and capabilities from across the pension industry, united by a shared desire to protect pension members from pension scam harms. Although it currently works, this arrangement is reliant on the good will of members, and of their employers. Competing priorities mean it is not as effective as it could be and is ultimately unsustainable in its current form.

The Code of Good Practice is not secure. When an updated is required, it is possible that the Code could instead be withdrawn.

### **About this consultation**

This consultation is aimed at pension trustees, advisers and administrators as well anyone else with an interest in protecting pension scheme members from scams and their potentially devastating consequences.

This consultation aims to understand the views of relevant stakeholders as to the value provided by PSIG, possible future direction and how this could be achieved. It is comprised of two parts, the first covering the potential value offered by PSIG and the second covering potential funding options. PSIG aims is to deliver the maximum possible value for lowest cost, whether this results in the value provided being restricted by available funding, or lower funding requirements if not all potential services are valued.

This consultation will run for three months starting on 1<sup>st</sup> May 2024 and closing on 31<sup>st</sup> July 2024. Any responses received after 31<sup>st</sup> July 2024 may not be taken into account. When responding please confirm whether you are responding as an individual or on behalf of an organisation. If responding on behalf of an organisation, please include a brief introduction to your work.

Please send your consultation response to [info@pensionscamsindustrygroup.org.uk](mailto:info@pensionscamsindustrygroup.org.uk).

### **Data protection and confidentiality**

We use survey data to measure stakeholder experience and improve our work, code of practice and other PSIG documents. All information provided in our survey is treated in confidence and used only to understand how we can improve our service or determine whether it is still needed. We may



share anonymised results and analysis of the survey. We may also publish or use externally anonymised results and analysis of the survey.

## **Part one – Value**

Part one is divided into nine sections, with each section containing details of services which PSIG either does or could provide, followed by up to four questions. If you can provide specific examples then this would be particularly useful.

### **Section one - Code of Good Practice**

Following industry demand, PSIG developed and launched the first Code of Good Practice in 2015. The Code is used extensively throughout the industry, undoubtedly mitigating the risk of transferring to pension schemes connected to pension scams and the consequential financial loss. The Code is also increasingly recognised as defining good practice, being quoted in Pension Ombudsman decisions and referred to in the new TPR General Code of Practice.

For pension practitioners, it can act as a starting point for policies and procedures in relation to potential pension scams. This not only facilitates better industry alignment but can also significantly reduce time and effort for those implementing due diligence procedures for the first time.

The Code is not, and cannot be, a static document. It is regularly reviewed and updated to reflect changing legislation and regulatory developments as well as emerging threats. There is also the potential for further development to improve access and navigation. A more modular approach may allow for more timely updates and help pension practitioners focus on areas most relevant to them.

*Question one – Do you use the PSIG Code of Good Practice as part of your transfer due diligence processes?*

*Question two - Does the PSIG Code of Good Practice add value to your business proposition?*

*Question three – What improvements could be made to the PSIG Code of Good Practice?*

*Question four – Do you have any other comments on the PSIG Code of Good Practice, other than in relation to technical content?*

### **Section two - Pension Scams Industry Forum**

Each month the Pension Scams Industry Forum (PSIF) meets to share knowledge of known and emerging potential scam risks. With around 85 companies participating in these calls, it's possible to identify key themes, evolving techniques and new approaches. PSIF also enables participating schemes and providers to more fully understand perfectly legitimate structures and investments which they may be encountering for the first time.

*Question five – Do you participate in in the Pension Scams Industry Forum?*

*Question six – If you participate in the Pension Scams Industry Forum, does this add value to your business proposition?*

*Question seven – What improvements could be made to the Pension Scams Industry Forum?*

*Question eight – Do you have any other comments on the Pension Scams Industry Forum?*

### **Section three - Pension Scams Action Group (PSAG)**

PSIG is a core member of the Pension Scams Action Group (PSAG), alongside the Department of Work and Pensions, Financial Conduct Authority, HM Treasury, Money and Pensions Service, National Economic Crime Centre and the Pensions Regulator. PSIG actively participates in the Strategy and Communication Groups, with a focus on improving public awareness and non-legislative interventions.

*Question nine – Are you aware of PSIG’s participation in the Pension Scams Action Group?*

*Question ten – Do you have any comments on PSIG’s participation in the Pension Scams Action Group?*

### **Section four - Raising scam awareness**

Increasing awareness of pension scams is an important element of PSIG’s work. This is achieved through social media, commentary and articles in trade and mainstream press and more recently through broadcast media.

Increased member awareness reduces susceptibility to scams and makes it easier to explain why appropriate due diligence might be necessary, even if it delays a requested transfer. Increased industry awareness is about a shared understanding of the reasons for transfer due diligence and increasing due diligence efficiency to minimise delays.

*Question eleven – Are you aware of the work undertaken by PSIG to increase awareness of pension scams?*

*Question twelve – Should PSIG increase, reduce or stop working to increase awareness of pension scams?*

### **Section five - Industry Surveys**

PSIG carried out a small survey in 2019, from which it extrapolated to estimate the huge impact of pension scams at that time, which ultimately led to the regulatory focus we called for. We also demonstrated the significant cost of industry due diligence. PSIG also provided significant input to a subsequent Police Foundation report on scams.

Due to the large PSIF membership, PSIG has the potential to undertake regular industry surveys, including in partnership with other organisations, to better understand industry experience and emerging trends.

A well-designed, consistent survey could be the foundation of a periodic report highlighting areas of concern and celebrating successes. Trends in scam guidance referrals, or due diligence timelines could provide more granular detail to support existing transfer times metrics. Effective due diligence practices could be identified, highlighted and shared. Emerging issues could be identified before they become widespread.

*Question thirteen – What should any periodic PSIG report contain?*

### **Section six - Sharing Legislative & Regulatory Expertise**

PSIG use their extensive legislative, regulatory and practical expertise to inform decisions taken by legislators and policy makers. This not only includes responses to relevant public consultations, but also discussion forums and various policy development initiatives.

The PSIG website has the potential to become a genuine information hub, able to answer queries and provide regular updates of frequently asked questions. It could be used to effectively host webinars and training sessions, as well as providing online training materials.

Subject to individual commitments, PSIG members are available to present at industry seminars and conferences, participate in roundtables and discussion panels and could potentially host dedicated events.

PSIG is represented on several industry bodies already including PSAG, the All-Party Parliamentary Group (APPG) on Investment Fraud, the STAR Steering Group and the Home Office/Serious Fraud Office Victim Support Group but our reach could be so much greater with formal representation on various industry bodies. Such representation would give PSIG the ability to better influence the change and legislative agenda ensuring that scam prevention considerations were always considered.

Updates and briefings could be provided for Trustee Boards, giving the opportunity to ask questions and raise any concerns.

An offshore capability could also be developed, working in partnership with regulators of jurisdictions where UK members could join non-UK pension schemes. PSIG has already input to Bloomberg Australia for a publication on overseas pension and investment scams.

*Question fourteen – How can PSIG most effectively share legislative and regulatory expertise?*

*Question fifteen – Which methods of knowledge sharing would you use?*

*Question sixteen – Should PSIG be members of relevant industry bodies?*

### **Section seven - Victim Support**

PSIG currently concentrates on prevention, rather than remediation. As mentioned above, PSIG is part of the multi-agency PSAG, the Home Office/Serious Fraud Office Victim Support Group, the APPG on Investment Fraud, each with an interest in victim support. PSIG has provided evidence to Work and Pensions Inquiries into fraud matters and has published a joint paper on pensions and investment fraud impact and has proposed significant recommendations for government. We are also actively working with the opposition on ideas for future action against scams and fraud. We work directly with victims of pension scams and provide support in their fight against inappropriate treatment by authorities, including HMRC. Unless prevention is total, there will always be pension scam victims requiring support. We are currently preparing case studies as evidence to HMRC of the need to update their fraud policy. The support we provide could continue and could also include actual signposting to other organisations with specific skills, highlighting existing due diligence requirements and their limitations, or simply making it clear that they are not alone and that anyone can be targeted.

For those who are prepared to share their experiences, these personal stories can themselves be a powerful way of raising awareness and reducing future scams.

*Question seventeen - What should PSIG be doing to support pension scam victims?*

### **Section eight – Anything else**

PSIG has considered sponsoring an accreditation scheme where providers and schemes could demonstrate good practice on scams protection of customers and members with the award of a kite mark to those who complete an independent audit process. We have not progressed this because of lack of funds, but would the industry support such an initiative?

PSIG in general, and the Code of Good Practice in particular, has concentrated on using pension transfer due diligence to help protect pension members, however the threat of pension related scams is far wider. Many potential scams target monies legitimately withdrawn from pensions, so arguably should not be considered pension related scams. Future developments, such as Pensions Dashboards could give rise to new opportunities for scammers.

*Question eighteen – Is there anything else which PSIG should be more involved with?*

### **Section nine - Winding up**

It might be that there is nothing of further value for PSIG to add which isn't already being covered by someone else. It could also be that although PSIG could add further value there won't be sufficient resources to continue. Although this would be hugely disappointing, it is a potential outcome which must be considered.

*Question nineteen – Should PSIG wind up?*

*Question twenty – If PSIG wound up, what would be the impact (if any) on pension scheme members and pension practitioners?*

## **Part Two - Funding**

PSIG is a voluntary body with no source of funding. All PSIG work relies on the goodwill of those donating time or resources. To give two examples, the registration, maintenance and development of the PSIG website is personally funded by the PSIG Chair and our PR Agency (KBPR) generously provide their services free of charge. These and other key dependencies, not only threaten PSIG viability, but also restrict any future development.

In this part you are being asked to review potential funding options. Taking into account both the structure and the value you would place on the service provided, what are your views on how any funding should be structured, and what this would mean to you.

Suggestions for alternative viable funding structures and different combinations are also welcome.

### **Membership fees**

Corporate membership fees could be introduced proportionally weighted to organisation size, number of pension scheme members represented, transfer volumes or some other measure.

Membership could be tiered, with more services available above the core tier.

### **Sponsorship or donations**

Organisations may wish to sponsor PSIG or a specific service provided by PSIG. Organisations or individuals may simply want to donate to running costs, either regularly or as a one-off donation.

### **Event Fees**

Fees paid to PSIG for PSIG representation at industry events and/or event fees for those attending PSIG hosted events.

**A la carte**

Separate pricing could be applied to individual PSIG services, either purely to cover the cost of those services or to partially subsidise core services.

**Combination**

One or more of the above options could be combined.

April 2024

## Appendix 2 – PSIG Technical Group

Margaret Snowdon OBE	Pensions Administration Standards Association (PASA), Pensions Policy Institute, Phoenix Group, Moneyhub, XPS Group, APPG on Investment Fraud, Consumer Duty Alliance and Retirement Income Taskforce
Matthew Swynnerton	DLA Piper
Roger Berry	Concept Group and Guernsey Association of Pension Providers (GAPP)
Rob O’Sullivan	Freetrade
John Wilson	Aptia
Ben Fairhead	Arc Pensions
Daniel Jacobsen	Muse Advisory
Rosie Kwok	Lane Clark & Peacock (LCP)
Phil Warner	3173
Tommy Burns	Concept Group and Kilgour Wealth Management Ltd
Kevin Whitmore	WBR Group
David James	Travers Smith
Jonny Davies	Aries
Colin Miller	XPS Group

## Appendix 3 – Consultation Respondents

Aegon
AoN
Aptia
Arlene Mitcham (Individual Member-Nominated Director)
Association of British Insurers (ABI)
Association of Member-Directed Pension Schemes (AMPS)
BP
Brightwell
Broadstone
Burness Paull
Dalriada
Hargreaves Lansdown
Investment & Life Assurance Group (ILAG)
Kent County Council
Lane Clark & Peacock (LCP)
Local Pensions Partnership Administration (LPPA)
Penny Pensions
Pensions Administration Standards Association (PASA)
Sackers
Sainsbury Pension Scheme
Saul Trustee Company (STC)
Scottish Widows
Society of Pension Professionals (SPP)
XPS Group