BGL Group Limited

Retail Banking Market Investigation

Response to Provisional Findings and Notice of Possible Remedies

1 Introduction

1.1 This response sets out BGL Group Limited's (**BGL**'s) preliminary views on the CMA's Provisional Findings and Notice of Possible Remedies published for consultation on 22 October 2015 in respect of its Retail Banking Market Investigation.

1.2 BGL operates Comparethemarket.com (**CTM**), one the UK's most popular price comparison websites (**PCW**s).

1.3 CTM was launched in 2006 primarily to facilitate customer switching in respect of personal lines insurance products (motor, home, life, travel etc). Over the years, the type of product or service that can be compared and marketed via CTM has expanded to include credit cards and energy.

1.4 It follows that this response focuses primarily on the remedies that the CMA has proposed insofar as they concern PCWs; however, this should not be interpreted as any endorsement of the underlying findings or remedies outlined by the CMA.

1.5 BGL may contribute further comments and feedback as the CMA's thinking develops on its possible remedies.

2 Executive summary

2.1 The CMA's remedies focus heavily on fostering greater customer engagement (whether based on more transparency or ease of interaction with various service providers and search and switching mechanisms in general). This is a sensible starting point, although some of the proposals could be strengthened to place greater onus on banks to support pro-actively and regularly clearer and more frequent messaging to customers in terms of the possibility, mechanics and advantages of switching.

2.2 At the same time, although the CMA has already received some criticism in the media that its remedies are too weak, it is perhaps difficult to accept the case for structural remedies at this stage, given the need to nurture the progress and innovation that is occurring already in the market and apparent customer satisfaction with the product.

2.3 In BGL's view, it is more a case for properly testing and strengthening some of the remedies outlined by the CMA to date (particularly with regard to triggering events, the roll-out of Midata and the development of common interfaces to facilitate switching). Certain remedies considered by the CMA (e.g. ANP, see section 6.1.5 below) are already quite radical remedies; however, going further than this, whether in the form of structural remedies or challenging some existing pricing models (e.g. FIIC banking), is more of a risk, particularly when the outcome of such steps is not clear and would be difficult to reverse.

3 Market overview

3.1 Personal Current Account (**PCA**) and Business Current Account (**BCA**) markets in both Great Britain (**GB**) and Northern Ireland (**NI**) are concentrated. Despite the arrival of various new market entrants in recent years, the market shares of the largest banks by volume in GB and NI have remained relatively stable for quite some time (e.g. in the case of PCAs, since 2005).

3.2 According to the CMA's own findings, while the picture is slightly different in NI, GB's four largest banks have lost less than 5% of their aggregate market share since 2005.

3.3 At the same time, the appetite for new market entry, at least on the part of challenger banks themselves, has not shown any sign of abating. In addition to around ten new banks entering the UK market in recent years, several more new banks, including those offering a digital-only platform, have been authorised in 2015 or are in the process of being authorised, including Atom Bank, Starling Bank, Civilised Bank and OakNorth.

3.4 It is plausible therefore that against this backdrop of new market entry, continuing low switching rates and stable market shares correlate to reasonably high levels of customer satisfaction, as opposed to a market structure which eliminates competition and fosters a lack of responsiveness on the part of customers.

3.5 The fact that customers appear to be satisfied with their accounts is supported by the CMA's own research (conducted by GfK). In other words, customers seem relatively happy with their current bank or see no reason to change.

3.6 This might suggest a number of market features associated with retail banking as follows:

3.6.1 barriers to new market entry may be high, but they are not insurmountable (as indicated by ongoing market entry);

3.6.2 innovation in the sector (both as regards products, with reward accounts etc, and new platforms or channels etc) is taking place;

3.6.3 customers are already getting reasonably good outcomes, and that the threat of switching is sufficient to impose a competitive constraint on the largest banks.

3.7 That said, the CMA's own research revealed variations in quality and pricing, which does not necessarily correspond to the highest market shares.

3.8 Taking these points in the round, it is perhaps difficult for the CMA to propose remedies that would radically change or upset the current market structure. In other words, it cannot be overlooked that remedies designed to change the structure of the market radically (splitting major banks, abolishing popular pricing models etc) may, in fact, be counterproductive.

3.9 At the same time, a combination of targeted measures designed to enable customers to compare accounts (based on reasonably clear, consistent and relevant parameters) and to engage easily and confidently in switching is only likely to enhance customer/consumer outcomes positively. Such measures are also less likely to give rise to the risk of adverse unintended consequences, and undermine the benefits that consumers appear to want, such as cheap, straightforward, convenient, secure and stable banking.

3.10 Indeed, the most common charging structure for PCAs in the UK is the free-if-in-credit (**FIIC**) model. According to the CMA's research, approximately 75% of all PCAs in the UK in 2014 were FIIC accounts.

3.11 Nevertheless, despite the ubiquity of the FIIC model, the complexity of the services provided under a PCA (or, indeed, a BCA) means that price comparisons between PCAs are, as they currently stand, deeply challenging.

3.12 This is because the actual prices paid by consumers will depend on the mix of PCA services they use including overdraft usage over time, as well as any other charges they incur.

4 (Lack of) Customer engagement

4.1 Despite apparent variations between banks in prices and quality (and the complexity of bank charges etc), the market shares of the largest banks have remained broadly stable, which suggests a lack of responsiveness by PCA customers to such issues.

4.2 For example, the CMA's consumer survey found that in 2014, 37% of respondents had been with their main PCA provider for more than 20 years; 57% of respondents had been with their main PCA provider for more than ten years. The CMA also noted that only 3% of PCA customers had switched PCA accounts to a different bank in the last year.

4.3 Given that customer engagement (at least as measured by switching rates and by PCA longevity) is low, it is necessary to explore whether there are any particular barriers to such engagement.

4.4 The CMA has identified the following possible factors as contributing to low levels of customer engagement:

4.4.1 A lack of trigger points because PCAs have no contract end date, which means that customers are not required periodically to consider if their PCA is best for them.

This is unlike other markets, such as private motor insurance, where switching rates are much higher, in part attributable to the activities of PCWs but also to a basic product that conforms to certain norms (thus lending itself well to price comparison) and where an annual renewal event prompts customers to evaluate (even if not switch) their existing provider.

4.4.2 High levels of stated customer satisfaction with their existing account. For example, 52% and 39% of respondents to a CMA survey indicated that they were ‘very satisfied’ and ‘fairly satisfied’ respectively with their accounts, despite the CMA identifying differences in the prices and quality of service offered by different banks.

According to the CMA, this suggests that customers are not always making an informed decision to remain with their existing PCA provider and may not realise there are other PCAs that may serve them better.

In markets like motor insurance where switching rates are much higher, customer satisfaction rates are lower, hence there is more incentive to switch. For example, in June 2014, the Insurance Times (referencing Consumer Intelligence research) reported:[1]

> *Consumer Intelligence also found that customer satisfaction with motor insurers overall is improving – though still at a low level.*

The key question that this raises is whether PCA (or BCA) customers are satisfied with their accounts based on an objective assessment, or whether

[1] Insurance Times, NFU Mutual tops motor insurance customer satisfaction ranking, 13 June 2014

high satisfaction rates are, in fact, based on misconceptions about the product (most importantly, about its cost).

Insurance products are expensive and, in certain respects, mandatory. The benefits associated with them, other than peace of mind, while critical do not manifest themselves at the point at which they are purchased (usually); instead, they crystallise, if at all, at the point of future claim. It follows that there is a natural incentive on the part of customers to minimise cost because the product is necessary rather than desirable.

PCA (and BCAs) on the other hand, while necessary, are not overtly expensive. Indeed, the critical issue as far as customer engagement is concerned is convincing a customer that a product which is frequently presented/perceived as free (i.e. the FIIC model) or very low cost, is potentially bad value, and thus merits regular review and possible switching.

Of course, customers are aware that they may incur charges despite having a FIIC account, but difficulties in comparing such charges over time render objective assessment difficult (both for the customer and any PCW).

Nevertheless, according to CMA research, customers can gain financially from switching PCAs. The CMA cites that:[2]

> *By switching to the cheapest PCA product, on average customers would save £70 a year, overdraft users would save on average £140 a year and heavy overdraft users would save on average £260 a year.*

The CMA considers that the size of these potential benefits from switching indicate that many customers are not sufficiently aware of available alternatives.

Changing customer perceptions is a huge challenge however and relies on a number of complementary initiatives, ranging from the adoption of common, well-understood standards to facilitate comparison across common product features (while still promoting product innovation) to ensuring better access to account usage information.

4.4.3 The CMA has identified what it believes to be barriers to accessing and assessing information on PCA (and BCA) charges, service quality and account/overdraft usage.

Although certain initiatives are attempting to address these information asymmetries, for example, the Midata initiative (which offers consumers the ability to access certain information by downloading their usage history in a file from their bank's website), such a mechanism is not yet sufficiently straightforward or effective to prompt widespread adoption.

To some extent, certain banks (for example, HSBC, Barclays and LBG) are offering greater transparency to customers, in terms of the provision of within-bank money management tools, as an adjunct to internet banking services. The intention of these services appears to be to enable customers to aggregate information across multiple accounts held with the bank.

These services enable customers to manage and track their funds in accounts held with that bank, which also helps the bank target specific financial products to the right customers. However, because many consumers have accounts with multiple providers, account aggregation at one bank does not provide the individual with an holistic financial picture of

[2] Retail Banking Market Investigation – Summary of Provisional Findings=, page 15

the state (and competitiveness) of their finances overall. This adds yet a further layer of complexity to an already complex exercise and renders price comparison difficult.

4.4.4 Finally, the CMA has noted a lack of consumer awareness of and confidence in the Current Account Switching Service (CASS) operated by Bacs. For example, in December 2014, the Payments Council reported that less than 50% of consumers were confident that CASS would complete bank account switches without error.

4.5 All of these factors would seem to contribute plausibly, albeit in very different measures, to a lack of customer engagement in terms of assessing (and possibly switching between) PCA providers. The same applies to BCAs, although the incumbency advantage presented by the customer having an existing PCA is also a factor, as well as the fact that SMEs perceive that remaining loyal to a bank will be beneficial, particularly in relation to future lending decisions.

4.6 However, one aspect that the CMA's provisional findings does not address clearly is whether there are other dis-incentives (real or perceived) on PCWs from investing in the technology and infrastructure necessary to drive greater customer engagement through enhanced transparency and comparison in the retail banking market. These dis-incentives might cover various factors, which range from:

4.6.1 mis-targeted and increasingly intrusive regulation in other markets popular with price comparison, which while attempting to promote customer confidence actually undermines the market conditions required to foster viable price comparison services; to

4.6.2 [*Deleted*]

[*Deleted*]

For example, following its investigation of the Home Credit market, the Competition Commission (CC) required relevant lenders to set up an approved price comparison website – *lenderscompared.org.uk* – to offer independent and impartial comparisons of home credit products for consumers. However, while offering useful information, the site is subject to a variety of prescriptive requirements, which limit its attractiveness and effectiveness etc.

In its evaluation of the remedies arising from its Home Credit Market Investigation (published in 2013), the CC reported that between 2009 (shortly after the site was launched) and 2012 (i) the number of visitors to the site had declined from an average of over 10,000 per month to around 4,500 per month, and (ii) the number of unique searches conducted on the site had fallen from around 17,000 per month to just over 5,000 per month.

While the intention of this project was laudable, this trend highlights that it is critical that any site developed/used to promote the comparison of products (whether home credit or other financial products) must be appealing and user friendly, failing which it will have only marginal impact. More importantly, it highlights the need to foster conditions which are conducive to the proliferation of independent PCWs tailored to meet consumer preferences, which while conforming to responsible standards, do not have to fit within an unduly prescriptive/Government-mandated format, which proves unpopular with customers and is therefore unused.

5 Specific barriers to PCW growth

5.1 Various potential barriers exist (some of which may be conflicting) which have the potential to undermine the development of price comparison services for PCAs and BCAs.

5.2 A key challenge faced by PCWs is the perception that PCWs can compare certain pricing information, but in the context of PCAs and BCAs, the complexity surrounding interest, fees and overdraft charges means that without improved information on the customer, the recommendations provided by a PCW are of limited value.

5.3 Further, PCWs are criticised for not reflecting other metrics in their returns, for example, branch access, the quality of customer service provided and the quality of online and telephone banking services etc. These additional considerations are important for customers, particularly BCA customers, where the convenience of having a branch nearby, having a relationship manager that knows your business or being offered financial services products tailored to your business, is of particular value (perhaps for BCA customers more so that PCA customers).

5.4 These considerations may be addressed over time as the market evolves. As mentioned above, the Midata project, despite some limitations, is already available to consumers to help them compare the value of different accounts based on their own usage.

5.5 Nevertheless, the underlying lack of data to facilitate more accurate and representative comparisons persists. This, in turn, is exacerbated because PCWs continue to face consumer concerns about data security. Consumers are perhaps reluctant to share their bank details with third parties, including PCWs.

5.6 This concern reduces the propensity for consumers to use PCWs for PCAs and BCAs altogether, which also means that customers are less likely to switch accounts directly through these services. This suggests that although PCWs have made some gains in the comparison of PCAs and BCAs, they are unlikely to experience the same success (shared with customers through lower pricing) as they have had in personal lines insurance markets.

5.7 On the supply side, PCWs face a further challenge in obtaining access to the data held by banks (regardless of customer consents etc). There are several reasons why banks may be reluctant to share the relevant data, for example:

5.7.1 Concerns about privacy and security, as well as legal and reputational risks that could be triggered as a result of a breach of security by a third party.

Indeed, in its 'Cash Savings Market Study Report'[3], the FCA noted that price comparison (or, rather, account aggregation) services in the UK may have been *inhibited by risks and around sharing of security information*. Many banks terms prohibit the sharing of this information with third parties.

5.7.2 The commercial imperative to restrict access to proprietary data.

5.7.3 The fear of the relationship with the customer transferring to the PCW.

5.8 In theory, some might attribute a perceived lack regulatory focus as resulting in a lack of consumer confidence, in terms of explaining why price comparison services in respect of PCAs and BCAs in the UK remain relatively under-developed. The theory goes that a move towards greater regulation in this area, with the FCA, the Treasury and the European Commission all supporting a change in policy, should alleviate these concerns and encourage use of these services. Having sensible and targeted regulation in place lessens the risk, or at least the perceived risk, that consumers and banks might have in providing their financial information to PCWs and other providers of account aggregation services; however, it is important that over-regulation is avoided.

5.9 Regardless of the merit or otherwise of these concerns, any package of remedies proposed by the CMA needs to drive greater access to information, without proposing disproportionate measures on PCWs, the effect of which is to reinforce existing

[3] Published in January 2015, page 85

concerns about entering a market where the threat and burden of misplaced or excessive regulation outweighs reasonable gains.

5.10 In addition to potential concerns about data security, as indicated above, political and media criticism of the benefits of using PCWs, their transparency and potential conflicts of interest has fostered scepticism that such sites are consumer champions. The reality is that without PCWs many markets would be far less competitive than they are now. Indeed, PCWs only survive if they continue to deliver savings to consumers; however, a corresponding acknowledgement that PCWs are commercial undertakings who are required to generate revenue and profit in order to invest in themselves, their platforms and the customer journeys and benefits they provide is frequently overlooked.

5.11 In terms of access to consumers' financial data, the European Commission's proposals under the new Payment Services Directive (PSD2) may partially remove certain information bottlenecks, by requiring banks to share information with licensed third parties, should their customers consent to this use of their data expressly; however, how this will impact commercial PCW propositions is not entirely clear.

5.12 In any event, the advent of PSD2 and Midata may improve the process of opening accounts and enable consumers to manage their finances in one place. It follows that if, as a result, third party services become more prevalent, this has the potential to increase customer switching by acting as an intermediary between the consumer and their bank, by increasing consumers' financial awareness and awareness of other products and services, and by reducing the informational advantage held by banks.

5.13 In terms of evaluating the Midata initiative, while the CMA's focus for the purposes of this investigation is PCAs and BCAs, it is important to remember that Midata's applications go beyond a comparison of current account information; it has the potential to help the customer evaluate his/her whole banking relationship, as well as other spending patterns. The whole purpose of the Midata initiative is to encourage consumers to be more aware of their spending habits and how best to spend and place their money, so the initiative can impact any aspect of personal finance, ranging from PCAs to credit cards to credit reports to utilities to mobile phones and beyond.

It follows that notwithstanding the confines of the present investigation, the potential benefits of the Midata initiative extend beyond the PCA/BCA silos in terms of Midata's ability to deliver positive outcomes for consumers. At the same time, another challenge is convincing customers that Midata is beneficial.

According to research conducted by Jigsaw Research in 2011, which was commissioned by government to evaluate the initial consumer response to the Midata project:

> *The initial consumer response was one of uncertainty and disengagement. A key reason for this was that the notion of 'personal data' was not well understood. Most tended to associate the term solely or primarily with personal profile information, whilst only the most savvy made the link to observed and transactional data. This focus on the personal profile side of data, which consumers already own, meant that the benefits of midata were not initially apparent. A typical reaction was that "I already know this so what's the point?"*
>
> *In addition, thinking about consumer data being held, stored or used by companies and government provoked a general sense of suspicion and anxiety amongst consumers. This caused them to focus on the risks associated with data, such as hacking and identity theft, rather than on the potential advantages. In other words, the tendency was to think about giving up rather than receiving data and therefore about ceding rather than gaining control.*[4]

[4] Jigsaw Research: Potential consumer demand for midata - Findings of qualitative and quantitative research, Prepared for midata Strategy Board, page 13

6 It follows that although customer perceptions may have begun to change since this research was conducted, in evaluating and promoting any remedy concerning Midata in the context of PCAs and BCAs, it is important that the potential wider benefits are acknowledged and investigated (beyond the confines of the PCA or BCA) in order to help address customers' residual concerns over the relevance, security and usefulness (to them) of such information.Further comments on remedies

6.1 In terms of specific comments on the remedies proposed by the CMA, BGL would make the following observations:

6.1.1 **Remedy 1 – Prompt customers to review their PCA or BCA provider at times when they may have a higher propensity to consider a change.**

The CMA is heading in the right direction; however, the trigger events considered by the CMA appear to be quite ad hoc and should be strengthened.

The CMA has noted in its findings that PCAs (and BCAs) are evergreen products with no pre-determined contract end date, which means that there are few, if any, natural trigger points for customers to consider searching for and switching PCAs (or BCAs).

A more effective proposition would therefore involve a regular annual review, which would supplement any natural trigger points. This review/reminder would possibly be more effective than certain natural triggers because it would specifically draw customers' attention to the possibility of searching and switching.

Any notification would need to remind customers – in clear and unambiguous terms - of the potential benefits of switching (and address potential misconceptions regarding the risks). It could also bring to customers' attention the cumulative costs to them of unarranged overdrafts taking into account a particular pattern of account usage over a defined period (e.g. the previous year).

Finally, it should also remind customers of the availability of price comparison services in respect of PCA or BCA propositions and the ability of PCWs (as potentially enhanced by other remedies considered by the CMA) to compare the specific attributes of different accounts based on individual customer preferences.

6.1.2 **Remedy 2 – Increase public awareness of the potential savings or rewards that could be obtained by changing one's current account provider and of the benefits of using the Current Account Switch Service (CASS) to do so in terms of security and convenience**

This remedy potentially ties in with Remedy 1 above, at least with regard to increasing customer awareness. As regards CASS, the key features and benefits associated with it could form part of the annual review/reminder, with a helpline supported by banks to provide further information to interested customers.

6.1.3 **Remedy 3 – Facilitate price comparisons between providers by making customer-specific transaction data more easily available and usable, including by PCWs**

This remedy is, from a PCWs perspective, absolutely critical. Without it, the benefits of price comparison services, while present, are insufficiently exploited. It may, inevitably, involve some degree of product standardisation; however, this does not preclude banks from competing on a wide set of parameters, against which customers can prioritise those aspects that are most important to them.

Midata also has the potential to be used to enable the comparison of account costs (e.g. overdraft charges) which are very difficult to compare currently, because such charges are highly dependent on account usage.

BGL would therefore support the continued roll-out of Midata, although a key challenge in enhancing its effectiveness, as acknowledged by the CMA, is overcoming customers' reluctance to download and upload their personal data (and ensuring customers receive accurate and unbiased information in this regard, in respect of which banks themselves may be well-positioned to play a greater role). This is not an inconsiderable challenge given customer concerns with regard to data security and misuse; indeed, even for those customers that want to exploit such an option, it can be difficult to locate this feature in customers' online banking information/bank webpages etc. The CMA should consider requiring banks to make it a more prominent/clearly signposted feature.

Further, if banks were required to adopt a common standard for application programming interfaces (APIs)[5] to which PCWs had access, this could enable PCWs, with the customer's permission, to access their transactions and could make comparison services easier and faster for consumers to use. In other words, this could drive greater competition and increased switching.

6.1.4 **Remedy 4 – A PCW for SMEs**

The success of this remedy is contingent on access to adequate and relevant data (including, potentially, data on a wider range of parameters, as mentioned above, of particular relevance to BCA customers). This is also relevant in the context of Remedy 5, which focuses on a wider frame of reference (service quality) for comparison services.

6.1.5 **Remedy 8 – Require payments into the old account to be redirected to the new one for a longer period than at present**

BGL does not consider that the current period for re-directing payments etc has any effect on customers' propensity to switch, so extending the 36-month redirection period is unlikely to have any material impact on switching rates.

Account number portability (ANP) would, however, potentially have a more positive effect on switching. As noted by the CMA, ANP would ensure that future payments into closed accounts would not go astray. The same kind of approach has been successfully adopted in the mobile phone sector; customers are therefore already likely to be familiar with the principles/process involved and, as a result, more accepting of it.

The benefits of ANP are fairly clear. By enabling a customer to retain a unique current account identifier after switching provider, instructions for incoming payments would not need to be changed as the underlying infrastructure would automatically send payments to the new bank. Direct debits and other outgoing payments could also be taken from the new account without interruption, while standing orders could use similar infrastructure to that currently provided by CASS. The upshot is that

[5] APIs enable financial technology firms to make use of customers' bank data on their behalf in innovative and helpful ways (e.g. enabling the customer to see through a smartphone how much they spend on certain bills, and how their spending fluctuates over a month or year)

customers (or any provider on their behalf) would not have to change payment instructions associated with their account or inform payers.

Alongside research conducted by the FCA into CASS, the FCA has already gathered some evidence on ANP (alongside other measures that might help make switching current accounts simpler and easier for consumers).[6] The FCA concluded that being able to keep bank account details (i.e. account number and sort code) would increase customer confidence in the switching process and that a significant number of PCA and BCA customers would be more likely to switch if they could retain their account details.

Of course, the investment necessary to deliver an effective ANP solution will depend on the specific ANP solution proposed (the FCA identified five different options) and whether such an option would deliver an incremental benefit over the CASS process.

The CMA has noted that some estimates suggest that ANP would be a relatively costly and intrusive measure to implement. At the same time, BGL considers that it merits further investigation (independent research) to see if a cost-effective solution would be viable, particularly in view of the work in this area already carried out by the FCA, which suggests that ANP would have a positive and possibly pronounced effect on switching.

6.1.6 **Remedy 9 – Require banks to retain and provide ex-customers, on demand, with details of their BCA and PCA transactions over the five years prior to their account closure**

BGL considers that ensuring that customers have comprehensive access to historic records covering their account usage over such period as would enable them to accommodate anticipated events (apply for a mortgage etc) is useful. That said, existing record keeping/data retention policies may already address these requirements.

In principle, the more data available for comparison purposes, the more accurate the outcome potentially (but bearing in mind that account usage may change radically over time to reflect changing circumstances); however, any solution needs to be proportionate and not drive further costs that the customer is expected to bear. This is particularly important when other remedies (such as those commented on above), which may be more productive in driving better customer engagement, will also have costs attached to them.

7 Conclusions

7.1 Despite the clear popularity of PCWs across a variety of markets, particularly insurance and utility markets in the UK, the use of such platforms in the comparison of PCAs and BCAs appears limited.

7.2 A key barrier, as highlighted above, is the difficulty in drawing meaningful comparisons of such products in the absence of detailed data on the behaviour of the customer.

7.3 Some steps have already been taken to address this issue, including ensuring that customers are able to access their own banking data in a form that can then be used by PCWs. That said, actual take up has been limited, despite its potential to increase consumers' financial awareness and make it easier for consumers to switch between current account providers.

[6] FCA, Account Number Portability Report, published 12 March 2015

7.4 This might imply security and privacy concerns from both consumers and banks; however, an equally plausible explanation is that demand for price comparison services in the retail banking market is limited at present.

7.5 If, on the contrary, the CMA considers that customers do have a real appetite to engage more actively in assessing and potentially switching their account providers, it is clear that PCWs have the potential to deliver savings to consumers and to provide a more efficient and cost-effective channel for new entrants into the retail banking market to reach consumers. However, more needs to be done in ensuring PCW access to relevant information that enables customers to assess their requirements and competing propositions.

7.6 If this can be achieved, consumers will no longer need to rely on a well-known brand when choosing a financial product. This, in conjunction with increased switching, should also encourage incumbents to compete for their customers based on factors such as value for money, quality and innovation.

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