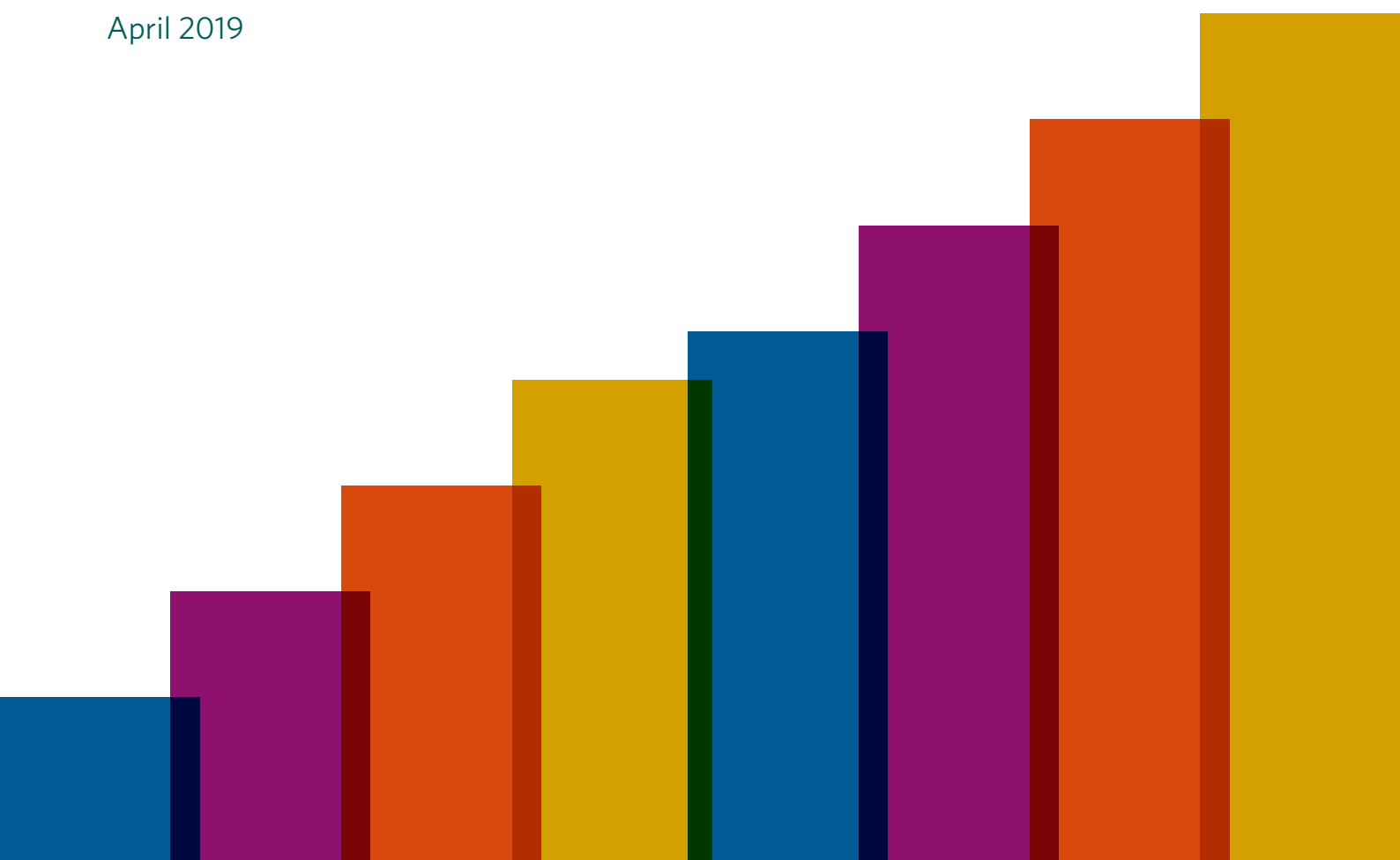


The Dormant Assets Scheme: A Blueprint For Expansion

Executive Summary
and Recommendations

April 2019



Executive summary

THE DORMANT ASSETS SCHEME

A dormant asset is one that a firm is unable to reunite with its beneficial, or rightful, owner. In 2008, the government passed the Dormant Bank and Building Society Accounts Act. This enabled banks and building societies to define any balances that had not been touched for 15 years, if their owners could not be traced, as dormant. These could then be transferred to an authorised reclaim fund. In 2011, Reclaim Fund Ltd (RFL) was established to fulfil this role, and worked with the government, the British Bankers' Association (now UK Finance), and the Building Societies Association to launch the dormant assets scheme. Banks were invited to join on a voluntary basis, and initially 14 signed up. Since then, participation has grown: 27 firms are now actively contributing to the scheme, including all major high street banks.

The scheme is underpinned by industry efforts to reunite forgotten or lost assets with their beneficial owners. To this end, RFL ensures sufficient funds are held to meet any repayment claims that may arise in full and in perpetuity. However, owners cannot always be found. When this happens, it is appropriate that genuinely dormant assets are used for public good. Since the scheme's inception, over £1.2bn has been transferred to RFL by participating firms, and over £600m made available to good causes.

EXPANDING THE SCHEME

In 2016, the independent Commission on Dormant Assets was convened to explore the feasibility of expanding the scheme beyond banking to include the rest of the financial services industry. In March 2017, the Commission recommended that a broad range of UK-domiciled financial products, irrespective of the nationality of their beneficial owners, would be suitable for inclusion. This would encompass additional bank accounts, unclaimed proceeds from life insurance and pensions products, and dormant holdings in investment funds, shares and bonds. The government responded to the Commission by emphasising that the expansion should be industry led, and called for Industry Champions to spearhead further work across four key sectors: banking, insurance and pensions, investment and wealth management, and securities.

This report sets out an implementation blueprint for an expanded scheme. It includes recommendations addressed to industry, the government and regulators, and covers both industry-wide ambitions and sector-specific details, in particular:

- the potential scope of an expanded scheme across industry
- definitions of dormancy for each sector
- other technical and practical considerations, including legislative and regulatory implications, and the transfer and reclaim of assets to and from RFL

CORE PRINCIPLES OF AN EXPANDED SCHEME

A founding principle of the dormant assets scheme is that customers should always be able to reclaim the amount that would have been due to them had a transfer into the scheme not occurred. For an expanded scheme to succeed in the future, this must remain the case. Consumer protection is at the heart of the scheme, and the reason it has been successful to date is that firms and their customers alike have confidence in it.

Led by their Industry Champions, working groups in each of the four sectors identified a number of cross-cutting issues and forged a set of core principles for an expanded scheme.

Principle 1 **Prioritise reunification efforts**

The first priority for all firms participating in the scheme is to seek to reunite owners with their assets. Only when reunification efforts are unsuccessful should assets be redirected to RFL.

Principle 2 **Maintain a voluntary scheme**

Participation by firms in the dormant assets scheme is, and should continue to be, voluntary.

Principle 3 **Provide full restitution in perpetuity**

Beneficial owners should continue to be able to reclaim, in perpetuity, the amount that would have been due to them had a transfer into the scheme not occurred.

Principle 4 **Tailor definitions of dormancy**

Due to significant differences in market practice across the four sectors, imposing a single definition of dormancy would be inappropriate and might risk lowering participation rates. Instead, the definition should be calibrated to the nature of the financial product and the experience of customer behaviour.

For sectors with long-term investment products and/or where customers do not regularly interact with firms, a dual definition is required: a trigger which identifies an account as 'potentially dormant' and a period of time that must then elapse before the account is designated as 'dormant'¹.

¹ See Chapter 3 of the full report for the scope of assets to be included in the scheme and the definitions of dormancy for them; see Chapter 3, Figure 3.6 (p.28) for a summary table of definitions by sector.

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A PHASED APPROACH

Successful expansion will depend on the government establishing a legislative framework which enables a wider range of assets to be included in the scheme. As this progresses, all sectors agree that the expansion will need to be phased. Firms will need to deepen their understanding of the scheme and implement new processes progressively. RFL will also need to develop its capabilities to accept and manage new types of assets.

It is likely that the pace of scheme implementation will vary from sector to sector. However, the key phases are consistent across them:

- Phase One focuses on:
 - establishing a supportive legislative framework
 - implementing standard practices for the tracing, verification and reunification of owners with their unclaimed assets in sectors that are new to the scheme (i.e. the insurance and pensions, investment and wealth management, and securities sectors)
 - continuing preparatory work for scheme expansion to include new types of assets
 - building and deepening participation in the current scheme from the banking sector, and communicating the scheme more widely.
- Phase Two follows necessary legislative and regulatory change, and focuses on the actual inclusion in the scheme – and transfer to RFL – of:
 - dormant cash accounts
 - dormant non-cash insurance and pensions assets that have been crystallised to cash by operation of a contractual, legal or regulatory event
 - proceeds from the sale of unclaimed shares and associated dividends.
- Subsequent phases focus on further scheme expansion to include more complex assets.

The range of assets to be included in the scheme at each phase is set out in Chapter 4.²

NEXT STEPS

This report marks the completion of the design phase of the expansion of the scheme. From 2019, industry, the government and regulators will enter into Phase One.

Establishing a supportive legislative framework

This is fundamental for a successful expansion of the scheme. Industry ambition for expansion is far greater than the current legislation allows. Without legislative change, reunification efforts can be improved and participation deepened to some degree. However, the cross-sector consensus is that, for a wider range of assets to be within scope of an expanded scheme, the government needs to introduce changes to primary and secondary legislation.

² See Chapter 4 of the full report, and Chapter 4, Figure 4.1 (p.33) for a summary table setting out the phased approach.

Implementing standard practices for tracing, verification and reunification

Standard practices are set out in Chapter 2 and Annex C, and industry should look to support their widespread adoption. In particular:

- The banking sector should continue to use its '10 core pledges'³ to guide reunification efforts.
- Several of the sectors that are new to the scheme already have guiding frameworks for managing dormant assets and/or gone-away customers (i.e. customers who cannot be contacted). Where these are in place and effective, they are reflected in the standard practices set out in Chapter 2, and sectors should continue to use them.

Continuing preparatory work

This will involve industry continuing to be involved in expanding the scheme, in particular working on:

- Quantifying dormancy: Reassessing the size and age of dormant assets at sector level will help potential participants understand the scale of the opportunity and prioritise the agenda accordingly. Sectors are encouraged to consider this as a potential work stream for 2019.
- Addressing sector-specific concerns: Work should continue on these in collaboration with relevant trade associations while the government considers the case for legislative amendments.
- Collaborating with RFL: Sectors should work with RFL during 2019 and beyond to develop its capability to accept and manage a wider range of assets.

Building participation and communications

Building participation in the scheme is essential to its success. For this to happen, all sectors agree upon the need for a holistic communications strategy. This should tell the story of the dormant assets scheme as a whole - from participating firms' attempts to trace customers, to transferring dormant assets to RFL, to how the surplus is put to work tackling social issues. The message should reach firms, their customers, regulatory bodies and the general public.

In addition, there should be significantly increased transparency from the government to participating firms over the allocation and use of dormant asset funds. The government should also consider ways in which firms can be engaged in the impact of the funds they transfer. Further transparency provisions should be established to enable public scrutiny of which firms choose to take part in the scheme and what level of assets they choose to contribute.

Joint work on communicating the dormant assets story more widely is already underway. In November 2018, a cross-sector workshop was held to begin discussions on building a strategy. This work will continue during 2019, with the goal of raising awareness among consumers and widening participation in an expanded scheme to include not just banks and building societies, but firms across industry.

³ <https://www.mylostaccount.org.uk/pledges>

ANNEX B: RECOMMENDATIONS

This annex compiles the key recommendations made throughout the report, and organises them according to the target group, namely: industry, the government and regulatory bodies.

RECOMMENDATIONS FOR INDUSTRY	
2	Tracing, verification and reunification
R2.1.	New sectors should implement the standard practices for tracing, verification and reunification outlined in Annex C.
R2.2.	The appropriate level of tracing, verification and reunification exercises should not be enshrined in future legislation, given the different products and systems in each sector. Rather, industry should put in place sector-specific frameworks that guide those exercises. Agency transfer agreements between participating firms and Reclaim Fund Ltd (RFL) should ensure that reasonable efforts are made before firms are able to transfer assets to RFL.
R2.3.	Working with its trade association (or equivalent), each sector should look to promote the benefits of using the sector's framework or principles for managing gone-away customers and/or unclaimed assets.
R2.4.	The insurance and pensions and investment and wealth management sectors would like to work with the Financial Conduct Authority (FCA) and RFL to consider whether an optional, proportionate approach to the efforts applied to the tracing of assets would be appropriate, as well as whether this should include a <i>de minimis</i> level above which more robust tracing, verification and reunification efforts should be applied prior to a transfer to RFL.
R2.6.	UK Finance and the BSA should consider working with other trade associations to explore how the MyLostAccount platform could be extended to, or replicated by, other sectors.
R2.7.	Industry should continue to explore the possibility of making the services of unclaimed assets register(s) free to the public, with support from relevant sectors.
3	Definitions of dormancy
R3.1.	Each sector, other than the banking sector, should consider developing a definition of a gone-away customer if it has not already done so.
R3.2.	The existing definition of dormancy for the banking sector, as defined in the Dormant Bank and Building Society Accounts Act 2008, should be retained (see R6.1).
4	Transfer and reclaim
R4.1.	During 2019 and, where necessary, thereafter, the sectors should work with RFL to enable them to establish the appropriate processes for including new types of assets in the scheme, and to ensure RFL can provide full restitution for these.
R4.2.	Firms should follow the current practices of submitting reclaim requests to RFL on a quarterly basis, except where a reclaim is of particularly high value (subject to agreement with RFL).
R4.3.	When a customer makes a reclaim, the firm should calculate the cash equivalent value of what the asset would have been worth had it not been transferred to RFL.
5	Building participation and communications
R5.1.	Industry, the government, RFL and the FCA should work together to agree and implement a holistic communications strategy that improves understanding and awareness of the dormant assets scheme and its planned expansion.
R5.2.	The government should assist industry in publicising and better supporting participants in the scheme, including: <ul style="list-style-type: none"> ● working with industry to create a dedicated dormant assets scheme website ● supporting industry to develop sector-specific communication packs ● working with RFL to celebrate new entrants.
R5.3.	RFL should create joining packs for prospective participants.
R5.5.	Industry should consider reassessing the size of dormancy at sector level in 2019 to enable firms to better understand the scale of the opportunity.

RECOMMENDATIONS FOR INDUSTRY	
R5.6.	RFL should continue to publish an annual report detailing which firms are participating in the scheme. To increase transparency, this information should be appropriately publicised, and made more prominent and readily accessible.
R5.7.	UK Finance, the Building Societies Association (BSA), The Investment Association (The IA), the Association of British Insurers (ABI), ICSA: The Governance Institute, and other trade associations should play a convening role in facilitating sector discussions about the scheme. They should consider including the expansion of the dormant assets scheme as an agenda item in relevant working groups, thus helping share relevant information with their members.
6	Banks and building societies
R6.1.	The existing definition within the Dormant Bank and Building Society Accounts Act 2008 of dormancy for banks and building societies should remain at 15 years of no customer-initiated transactions (see R3.2).
R6.2.	Existing participants are encouraged to: <ul style="list-style-type: none"> ● continue identifying all potentially eligible assets for inclusion within their future transfers to RFL ● create appropriate processes, where necessary, for eligible Cash Individual Savings Accounts (ISAs) and cash assets held in Suspense Accounts to be included ● support RFL's objective of increasing its reclaim modelling capabilities through evaluating additional dormant account data transfer.
R6.7.	UK Finance and the BSA should arrange a meeting for the Banks and Building Societies Working Group (BBSWG) to address any outstanding issues and, where appropriate, ensure that dormant assets issues are considered at the meetings of any relevant industry forums.
7	Insurance and pensions
R7.1.	All firms are encouraged to follow the ABI's principles for reconnecting with gone-away customers (whether members of the ABI or not).
R7.2.	The insurance and pensions sector would like to work with RFL and the FCA on how best to recognise the sector principles on tracing, verification and reunification.
R7.3.	The IPWG recommends a <i>de minimis</i> value of £100 per customer above which more robust tracing, verification and reunification efforts would be applied, and welcomes a dialogue with the FCA about this as part of a broader conversation on the best approach to tracing, verification and reunification.
R7.4.	For policies with a contractual end, the dormancy period is recommended to be seven years after the crystallising event or, where earlier, at the point at which it is identified that a deceased customer has no next of kin.
R7.5.	For policies with no contractual end, the dormancy period is recommended to be whichever comes earlier: the point at which it is identified that a deceased customer has no next of kin, or seven years after a death claim is accepted and there is no ongoing contact with those managing the estate.
R7.6.	The working assumption is that firms are able to crystallise assets to cash at the end of the contractual term, but legal due diligence to confirm this is recommended. A sample of product terms and conditions for policies that crystallise to cash should be reviewed to assess the likelihood of firms being able to crystallise assets to cash, and therefore the likelihood of future legislation being required to address this potential issue. This should be conducted as part of this sector's preparations in 2019.
8	Investment and wealth management
R8.1.	Members of The IA are encouraged to follow The IA's principles for tracing gone-away customers.
R8.3.	The IWMWG recommends that firms in its sector define dormancy at the customer level, so that all of a customer's assets are identified as dormant in a consistent manner. In line with the current Act Guidance notes, the government should consider how future legislation may enable providers to consider client activity on other accounts within the same firm when defining dormancy. This would enable firms in the investment and wealth management sector to choose to define dormancy at the customer level without hindering other sectors' ability to transfer to RFL on an account or product level.
R8.4.	The period of dormancy in the investment and wealth management sector should be measured as follows: <ul style="list-style-type: none"> ● where the customer is owed or holds a cash amount only (potentially from an outstanding unclaimed distribution or unpaid redemption proceeds), and it has been outstanding for a six year minimum period from the date payment became due ● where the customer has holdings in unit trusts and/or Open-Ended Investment Companies (OEICs) (and potentially also a cash amount), and a gone-away indicator has been added a minimum of 12 years ago and there have not been any active transactions on the customer's account.

RECOMMENDATIONS FOR INDUSTRY	
R8.5.	Once addressed in any subsequent phases, the timing of the liquidation of non-cash dormant assets being transferred to RFL as cash should be in line with firms' own policies.
9	Securities
R9.1.	Companies in the securities sector should consider proactively reviewing their security holder base on a regular basis.
R9.2.	Companies in this sector should not be required to repeat tracing attempts; rather, this should be optional to account for differences in companies' size and abilities.
R9.3.	Companies in this sector should not set targets related to the reunification of dormant assets. It is felt that the passive nature of the relationship with the shareholder in this particular sector would make this inappropriate, and may drive the wrong kind of behaviour in order to meet them.
R9.4.	The securities sector should adopt a three- and seven-point 'Track and Trace' process.
R9.5.	The scope of dormant assets that the SWG has considered is only within public companies. For shares and unclaimed dividends, dormancy should be defined as a period of no shareholder-initiated contact for 12 years and: <ul style="list-style-type: none"> ● the shareholder has been identified as gone-away (i.e. had three or more items of post returned from the registered address) ● where applicable, at least three dividends have become payable but have not been cashed.
R9.6.	During 2019, ICSA: The Governance Institute's Registrars Group should determine a definition of 'no contact' for the purpose of defining a gone-away shareholder.
R9.7.	For proceeds from corporate actions, dormancy should be defined as 12 years of no shareholder-initiated contact from the point at which the company received the consideration.
10	Legislation and regulation
R10.1.	Pending legislative change, industry should improve tracing, verification and reunification efforts as well as deepen participation in the scheme by banks and building societies.
R10.2.	The insurance and pensions and investment and wealth management sectors would like to work with RFL and the FCA on how best to recognise the sector principles on tracing, verification and reunification.
R10.4.	Industry would like to work with the FCA to determine how to amend the Client Assets Sourcebook (CASS) and the Collective Investment Schemes (COLL) sourcebook rules to implement agreed definitions of dormancy, and ensure there are no regulatory impediments to transferring assets to RFL.
R10.5.	Further work is required to explore how an expanded scheme could benefit from Financial Services Compensation Scheme (FSCS) protection should RFL become insolvent.
11	Next steps
R11.1.	The government should consider the case for legislative amendments to enable all sectors to participate in the scheme.
R11.2.	Standard practices for tracing, verification and reunification should be implemented within each sector where they have not been already.
R11.3.	Sectors are encouraged to reassess the size and age of dormancy in 2019.
R11.4.	Industry should continue to resolve sector-specific concerns in collaboration with trade associations in 2019.
R11.5.	Sectors should work with RFL during 2019 and beyond to ensure its capability to include a wider range of financial assets in the scheme, while ensuring the core principles can be met.
R11.6.	Industry, the government and RFL should develop a cross-cutting communications plan during 2019 that seeks to build understanding, engagement and participation in the dormant assets scheme.

RECOMMENDATIONS FOR GOVERNMENT	
2	Tracing, verification and reunification
R2.2.	Industry recommends that the appropriate level of tracing, verification and reunification exercises should not be enshrined in future legislation, given the different products and systems in each sector. Rather, industry should put in place sector-specific frameworks that guide those exercises. Agency transfer agreements between participating firms and RFL should ensure that reasonable efforts are made before firms are able to transfer assets to RFL.
R2.5.	Some sectors support levying a tracing charge on assets where appropriate, while other sectors believe this compromises the principle of full restitution. The government should consider both consumer protection and the risk of lower participation from some sectors before reaching a decision for any future legislation.
R2.8.	To improve reunification rates, most sectors believe the government should amend primary and secondary legislation, where necessary, to enable data sharing for the specific purpose of aiding tracing, verification and reunification attempts. The Digital Economy Act 2017 and the Tell Us Once service have been identified as potential opportunities.
3	Definitions of dormancy
R3.2.	The existing definition of dormancy for the banking sector, as defined in the Dormant Bank and Building Society Accounts Act 2008, should be retained.
R3.3.	When expanding the legislation to enable a greater range of financial assets to be transferred into the scheme, the government should use the following definitions of dormancy: <ul style="list-style-type: none"> ● Insurance and pensions: <ul style="list-style-type: none"> ○ For policies with a contractual end, the dormancy period should be seven years after the crystallising event or, where earlier, at the point at which it is identified that a deceased customer has no next of kin. ○ For policies with no contractual end, the dormancy period is recommended to be whichever comes earlier: <ul style="list-style-type: none"> – the point at which it is identified that a deceased customer has no next of kin – seven years after a death claim is accepted and there is no ongoing contact with those managing the estate. ● Investment and wealth management: <ul style="list-style-type: none"> ○ Where the customer is owed or holds a cash amount only, the asset becomes dormant when it has been outstanding for at least six years from the date payment became due. ○ For a customer with holdings in unit trusts/OEICs, dormancy is defined as where a customer has been identified as gone-away for at least 12 years and there have not been any active transactions on the customer's account during that time. ● Securities: <ul style="list-style-type: none"> ○ For shares, unclaimed dividends and proceeds from corporate actions, dormancy should be defined as a period of no shareholder-initiated contact for 12 years and: <ul style="list-style-type: none"> – the shareholder has been identified as gone-away (i.e. had three or more items of post returned from the registered address) – where applicable, at least three dividends have become payable but have not been cashed.
4	Transfer and reclaim
R4.4.	HMRC will need to consider the tax implications of expanding the scheme and how best to ensure tax neutrality.
5	Building participation and communications
R5.1.	Industry, the government, RFL and the FCA should work together to agree and implement a holistic communications strategy that improves understanding and awareness of the dormant assets scheme and its planned expansion.
R5.2.	The government should assist industry in publicising and better supporting participants in the scheme, including: <ul style="list-style-type: none"> ● working with industry to create a dedicated dormant assets scheme website ● supporting industry to develop sector-specific communication packs ● working with RFL to celebrate new entrants.
R5.4.	The government should improve transparency on how dormant account money is allocated and used and explore ways to engage industry in the impact of the scheme.
R5.8.	As part of an expanded scheme, the government should consider the feasibility of expanding the alternative scheme to allow smaller firms from the new sectors with strong local affiliations to join.

RECOMMENDATIONS FOR GOVERNMENT	
6	Banks and building societies
R6.1.	The existing definition within the Dormant Bank and Building Society Accounts Act 2008 of dormancy for banks and building societies should remain at 15 years of no customer-initiated transactions (see R3.2).
R6.3.	HMRC should consider how to supply additional guidance on the treatment of Cash ISAs of deceased customers that have been transferred to the dormant assets scheme, as well as certain practical clarifications outlined in Section 6.8.
R6.4.	As part of any programme of legislative change, the government should consider options to enhance the clarity of the existing Act by explicitly including Suspense Accounts.
R6.5.	The government should maintain the alternative scheme provisions within any subsequent legislative revision to continue to encourage the engagement of participants with assets of less than £7bn, and review its position in three years.
R6.6.	The government is encouraged to engage with the Chief Executive Officers/Chairs of potential participants about the benefits of joining the scheme.
7	Insurance and pensions
R7.4.	For policies with a contractual end, the dormancy period is recommended to be seven years after the crystallising event or, where earlier, at the point at which it is identified that a deceased customer has no next of kin.
R7.5.	For policies with no contractual end, the dormancy period is recommended to be whichever comes earlier: the point at which it is identified that a deceased customer has no next of kin, or seven years after a death claim is accepted and there is no ongoing contact with those managing the estate.
8	Investment and wealth management
R8.3.	The IWMWG recommends that firms in its sector define dormancy at the customer level, so that all of a customer's assets are identified as dormant in a consistent manner. In line with the current Act Guidance notes, the government should consider how future legislation may enable providers to consider client activity on other accounts within the same firm when defining dormancy. This would enable firms in the investment and wealth management sector to choose to define dormancy at the customer level without hindering other sectors' ability to transfer to RFL on an account or product level.
R8.4.	The period of dormancy in the investment and wealth management sector should be measured as follows: <ul style="list-style-type: none"> ● where the customer is owed or holds a cash amount only (potentially from an outstanding unclaimed distribution or unpaid redemption proceeds), and it has been outstanding for a six year minimum period from the date payment became due ● where the customer has holdings in unit trusts/OEICs (and potentially also a cash amount), and a gone-away indicator has been added a minimum of 12 years ago and there have not been any active transactions on the customer's account.
R8.6.	The government should consider an undertaking that, in the event of a subsequent claim for a non-cash asset, the customer will only be entitled to an equivalent cash payment (in line with the principle of full restitution) and not reinstatement of the original investment.
R8.7.	Clarification in future legislation is sought around the exact point in time that the cash amount due to a customer is calculated for a reclaim.
9	Securities
R9.5.	The scope of dormant assets that the SWG has considered is only within public companies. For shares and unclaimed dividends, dormancy should be defined as a period of no shareholder-initiated contact for 12 years and: <ul style="list-style-type: none"> ● the shareholder has been identified as gone-away (i.e. had three or more items of post returned from the registered address) ● where applicable, at least three dividends have become payable but have not been cashed
R9.7.	For proceeds from corporate actions, dormancy should be defined as 12 years of no shareholder-initiated contact from the point at which the company received the consideration.
R9.8.	The government should consider amending the Companies Act 2006 to allow the proceeds from corporate actions to be passed to RFL instead of the courts.
R9.10.	The government should consider implementing a statutory instrument or primary legislation to amend companies' articles of association to allow companies to specify the terms on which the shares would be forfeited (including the dormancy period and a <i>de minimis</i> tracing level) prior to passing funds to RFL. The position of share registrars should also be clarified to ensure they do not bear responsibility for restitution.
R9.12.	The government should consider the impact of the proposals on dematerialisation and how this may impact an expanded scheme if progressed.

RECOMMENDATIONS FOR GOVERNMENT	
10	Legislation and regulation
R10.3.	In order to expand the dormant assets scheme, primary legislative change is necessary to allow the scheme to receive a wider range of assets. It is recommended that future primary legislation enshrines the power to include additional assets and participants via secondary legislation, which would be consistent with a phased approach.
R10.5.	Further work is required to explore how an expanded scheme could benefit from FSCS protection should RFL become insolvent.
11	Next steps
R11.6.	Industry, the government and RFL should develop a cross-cutting communications plan during 2019 that seeks to build understanding, engagement and participation in the dormant assets scheme.

RECOMMENDATIONS FOR REGULATORS	
2	Tracing, verification and reunification
R2.4.	The insurance and pensions and investment and wealth management sectors would like to work with the FCA and RFL to consider whether an optional, proportionate approach to the efforts applied to the tracing of assets would be appropriate, as well as whether this should include a <i>de minimis</i> level above which more robust tracing, verification and reunification efforts should be applied prior to a transfer to RFL.
5	Building participation and communications
R5.1.	Industry, the government, RFL and the FCA should work together to agree and implement a holistic communications strategy that improves understanding and awareness of the dormant assets scheme and its planned expansion.
7	Insurance and pensions
R7.2.	The insurance and pensions sector would like to work with RFL and the FCA on how best to recognise the sector principles on tracing, verification and reunification.
R7.3.	The IPWG recommends a <i>de minimis</i> value of £100 per customer above which more robust tracing, verification and reunification efforts would be applied, and welcomes a dialogue with the FCA about this as part of a broader conversation on the best approach to tracing, verification and reunification.
8	Investment and wealth management
R8.2.	The investment and wealth management sector would welcome a discussion with the FCA and RFL in 2019 on the <i>de minimis</i> limit as part of a broader conversation on the best approach to the tracing, verification and reunification of customers with their assets.
R8.8.	The FCA should consider changes to CASS, COLL and other relevant rules to facilitate the transfer of dormant assets in this sector and liability for meeting reclaims to RFL.
9	Securities
R9.9.	The Financial Reporting Council should consider encouraging companies to disclose details of dormant assets in their annual reports, and to continue discussions to develop a 'participate and explain' approach to participation in an expanded scheme.
R9.11.	The FCA should consider amendments to CASS rules to enable dormant shares and unclaimed dividends held within a Corporate Sponsored Nominee to be transferred to RFL.
10	Legislation and regulation
R10.2.	The insurance and pensions and investment and wealth management sectors would like to work with RFL and the FCA on how best to recognise the sector principles on tracing, verification and reunification.
R10.4.	Industry would like to work with the FCA to determine how to amend CASS and COLL rules to implement agreed definitions of dormancy, and ensure there are no regulatory impediments to transferring assets to RFL.

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