Response by TISA to the JMLSG Consultations Issued in June 2026

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About TISA

Supporting the financial journey through life

The Investing and Saving Alliance (TISA) is committed to improving the financial wellbeing of all UK consumers by working collectively with the financial services industry to deliver solutions and champion innovation, for the benefit of people, our industry, and the nation.

We do this by working with our member firms to deliver practical solutions and devise innovative, evidence-based strategic proposals for government, policy makers and regulators that address major consumer issues.

We care about the entire financial life of consumers: from their first savings account opened to ensuring people can age and retire with dignity. TISA believes that savings and investments play a significant role in the lives of people and small businesses. Consumers benefit when they put aside money for their future. Saving and investing can provide a buffer for emergencies; help people achieve big and small goals throughout their lifetime; and give people quality of life in later years.

TISA is a not-for-profit membership organisation and a trusted partner of key industry stakeholders in helping shape the future of the UK financial services and the environment in which we operate. We have over 260 member firms involved in the supply and distribution of savings and investment products and associated services.

Our work, your influence

Our policy work reflects TISA's broad scope of interests and aims on meeting the needs of UK consumers, members and our industry. From improving financial education, inclusion and accessibility, right through to savings, investments and retirement planning, the work we do with our members to **influence policy** is crucial in enhancing the industry we operate in and driving positive change.

As part of our commitment to delivering focused and impactful consumer outcomes, TISA's policy working groups have been structured into three distinct workstreams:

1. **Consumer Protection -** *Protecting the best interests of UK consumers in their financial journeys.*
2. **Consumer Access -** *Considering issues that could directly impact access to financial products.*
3. **Effective Products -** *Examining key considerations and legislation relating to products across the investing and saving landscape.*

All groups focus on both strategic and technical elements of policy/regulation. We provide a channel for firms to have their say on the policy we develop and present, contribute to our technical and regulatory interpretation work and, importantly, gain insights from other TISA members, policy makers, government and regulators.

Find out more about TISA here: **www.tisa.uk.com/about-tisa**

Summary of Recommendations

Paragraph 2.9 (clarification of 'unusually')

No additional comments.

The proposed wording is consistent with the amendment to the Money Laundering Regulations (MLRs) and the intent of the change, as outlined in the HM Treasury Consultation Response[1].

Paragraph 5.2.4A (bank insolvencies exception)

It is recommended the reference to "UK" within the first sentence of paragraph 5.2.4A be removed so that it reads "A firm may permit an insolvent bank customer to open…". This would mean the reference to "insolvent bank customer" fully aligns with the first bullet point within paragraph 5.2.4A and the defined term contained within the MLRs.

Paragraph 5.3.142 and Annex 5-V (pooled client accounts)

Within paragraph 5.3.142 we have noted the proposed removal of the bracketed wording, which includes the removal of the reference to securities holdings to align it more closely to the wording in Regulation 37(5) within the MLRs.

We have also noted, within the MLRs, the following definitions of "pooled accounts":

- Regulation 29(10) – "…the relevant person provides a customer with a new account into which monies are pooled ("pooled account")…"
- Regulation 37(5) – "...the product is an account into which monies are pooled (the "pooled account")…"

From the consultation process leading up to the publication of the draft Statutory Instrument, it was made clear that a "pooled account" is a bank account. Accordingly, we propose an amendment is made to the wording within paragraph 5.3.142 to provide further clarity regarding the scope of this paragraph. We propose that the reference to "financial services firms" within the second sentence be removed and replaced with "banks" and a reference to "client money" added. Accordingly, the sentence would read "Banks with which such client money is held…".

Within Annex 5-V, it would be helpful if a cross reference to the relevant regulations within the MLRs is added (Regulations 29(10) – 29 (18)). It would also be helpful to note that, within the MLRs, reference to

[1] HM Treasury: Improving the Effectiveness of the Money Laundering Regulations, Consultation Response (July 2025)

"pooled account" within Regulation 29(10) has the same meaning as Pooled Client Account (PCA) used within this Annex.

Within Annex 5-V we have noted that a footnote has been added to describe a PCA. We consider this unnecessary duplication as a PCA is already defined within the definition section of this Annex and, accordingly, can be deleted.

Within section 1.2 of Annex 5-V we have noted that it is proposed to add the following sentence: "A firm may apply simplified due diligence measures when the criteria in paragraph 5.3.142 are met". Given the intention of this change is to decouple the link between pooled accounts and simplified due diligence in the MLRs we believe this sentence should be removed. The new requirements contained in Regulation 29 apply to all new pooled accounts (once the new SI comes into force).

Paragraphs 5.3.94A and 5.3.99 (acting on behalf of a customer)

We broadly agree with the proposed wording within paragraph 5.3.94A and the revision to the wording within paragraph 5.3.99.

In order to enhance clarity, we would suggest a revision to the wording within the last sentence of paragraph 5.3.94A, as follows:

"Employees or staff of an entity acting on its behalf (e.g. as authorised signatories) should be considered to be acting as the entity and are not subject to these obligations."

By making reference to authorised signatories, which would include staff members using a company credit card, we believe this provides a clearer statement on the breadth of the circumstances where the obligations in Regulation 28(10) do not apply.

Overall, we welcome this change as it addresses the risk of potential over-compliance with the Regulations that subjecting employees transacting for their employer to a full CDD process would create.