TISA

Response by TISA to:
TPR Corporate strategy consultation 2026-2031

Renny Biggins
Head of Policy: Products & Long-Term Savings

May 2026

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 approximately 270-member firms involved in the supply and distribution of savings and investment products and associated services. Our members include the UK's major investment managers, retail banks, online platforms, insurance companies, pension providers, distributors, building societies, wealth managers, third party administrators, FinTechs, financial consultants, financial advisers, industry infrastructure providers and stockbrokers.

Our work, your influence

With a focus on four key workstreams that best support the consumer and UK financial services, TISA has become a leading industry voice and ally for delivering consumer focused initiatives.

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. Key outputs from our workstreams can include recommendations to government and regulators on developing a financial services framework that protects and benefits UK consumers, finding solutions to operational/infrastructure challenges and developing standards of good practice on the interpretation and implementation of new 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:** https://www.tisa.uk.com/about-tisa/

Executive Summary

TISA welcomes the opportunity to respond to the TPR Corporate Strategy 2026-2031 Consultation.

We fully support the system-wide approach and ambition to deliver a pensions framework that delivers consistent and positive outcomes for its members. This is essential if we are expecting members and employers to invest increasing levels of contributions into the system over the coming decades.

Robust defaults are a fundamental part of the design, given we have (and will likely always have) a large group of unengaged members. However, it is important we retain member choice and flexibility, so those that do engage have a range of options from which to choose from.

Whilst the scope of this consultation is confined to TPR strategy, we have nonetheless taken the opportunity to emphasise the need for a collaborative and joined up approach across the regulators and government. This is not always achieved and at times, the constant stream of regulatory change creates barriers to member engagement and understanding.

The existing pipeline of change coming through in the next five years does have the opportunity to revolutionise member outcomes and the way in which people engage with their pension savings. It is crucial that government departments and regulators are correctly positioned to ensure these changes deliver on their potential and we would like to see the TPR vision expanded on to reflect this.

We look forward to continued engagement with TPR over the coming months and years – a period which will undoubtedly see some of the biggest changes to DC pensions in generations.

Question responses

Q1: Does our vision of people having a sustainable income in retirement set the right long-term ambition for the pensions system? Could it be strengthened?

We recommend this aspect is strengthened but believe a wider vision is required if we are to collectively deliver adequate retirement outcomes for members.

A sustainable income in isolation doesn't mean much. A pension of £5 per month, guaranteed for life is sustainable but not an ambition or outcome that the UK pensions system should be delivering.

Additional aspects that the vision should include are:

1. **Adequacy.** At a high level, the pensions system should have an ambition of delivering pension pots that are capable of providing an adequate and sustainable income in retirement.
2. **Flexibility and choice.** It is important that consumer choice and flexibility is preserved as we are not looking to reverse engineer pension freedoms. However, there should be an objective that these decisions are made on an informed basis that is appropriate for the circumstance. These aspects should feature in the overarching ambition.
3. **Consistency in member journeys.** Whilst the collaboration between TPR, DWP and FCA is welcome, we still see inequity in the opportunities, support and safeguards in place for members across the regulatory regimes - Targeted Support and Investment Pathways are two examples. More needs to be done to meet this ambition.
4. **Supporting overlapping initiatives.** The second Pensions Commission is currently undertaking significant work to drive up retirement outcomes for all UK citizens. Whilst the commission is not expected to run for the term that this consultation covers, it nonetheless provides an excellent example of the need for TPR to support other government initiatives which have overlapping objectives.

Q2: Are the trends we identify – including consolidation, scale, technology, digitalisation and artificial intelligence – the main forces that will shape the system over the next five years? What's most important? Is anything missing?

These include many of the trends that will have a significant impact on the UK pensions system in the next five years. We would like to add the following, some of which link to the additional considerations included in our response to Q1.

1. Persistent levels of undersaving. This will have a significant impact, as the system will need to adapt and find ways to reduce saving shortfalls.
2. Inconsistency in member journeys. Detailed above.
3. Persistent regulatory change, particularly following changes in government. We will have a general election within the next three years and with pensions being susceptible to political intervention, we need to acknowledge the likelihood that notable changes could be introduced in the next five years. Constant change undermines member trust and confidence in the pensions system and undermines much of the good work currently being undertaken.
4. Education and support. Whilst there will always be a substantial percentage of unengaged pension savers within AE, we should never give up on engagement. Some of the pipeline change should revolutionise the way in which people interact with their pension savings. Industry, employers and government have a collective responsibility to ensure members make informed decisions through robust support and education.

Q3: Where could The Pensions Regulator's role be more active, or targeted, to maximise saver outcomes and support a resilient and sustainable market?

In the absence of contribution rises to minimum auto enrolment contributions levels (which have been ruled out for the current parliamentary term), more focus needs to be placed on incentivising employees to save more. A more targeted approach to employers could help achieve greater success in this area and help ensure employees who can afford it, are making the most of their employer AE contribution structures. Larger employers generally have more capacity to offer these benefits, so there would be a need to segment employers to ensure support is targeted at the right employers.

Although TPR's role is to enforce legislation rather than create it, we believe TPR, FCA, DWP, HMRC and HMT should operate in a more collaborative way, with the regulators representing industry and pushing back on proposed government change if there are strong and justifiable industry concerns and vice versa. The 2017 AE recommendations have still not been implemented meaning not only was this a waste of time and effort but we continue to push the can down the road, resulting in hundreds of thousands of additional individuals at all stages of the journey on a shortfall trajectory. Furthermore, the first generation of members to be truly impacted by these shortfalls are getting closer to retirement and experiencing the hard reality of this foreseeable crisis, with its knock-on impact to Government. We advocate for members to behave responsibly with their pension wealth and that sentiment also applies to Government and associated statutory bodies.

Given the pace and overlapping nature of pipeline and proposed change, we also see potential conflicts in some areas and seemingly illogical sequencing/timescales. For instance:

- A multi-employer scheme demonstrating excellent VfM but not achieving the scale will be forced to windup, whereas a single-employer scheme providing adequate VfM will be allowed to continue operating.
- VfM will be introduced before the scale requirements have any impact. As such, hundreds of scheme defaults which will not exist within two to three years will be caught by VfM, causing unnecessary additional work for industry,
- There is a strong recognition that most consumers need to save far more into their pensions to achieve adequate retirement outcomes but at the same time, pensions are being included within IHT, which will cause some to question whether they should bother increasing contribution levels and at the other end, it is resulting in people drawing down faster and gifting pension assets to grandchildren to avoid incurring a tax which was introduced retrospectively.
- Following unprecedented pre-budget speculation on the removal or reduction in the 25% tax free cash option, HMRC announced that TFC has no cooling off rights, despite most of industry offering this since A-Day and it being an apparent contradiction to COBS rules. Following strong industry pushback, it took a period of many months before we had a joint statement from HMRC and FCA, which during the interim, left industry and scheme members in limbo. Whilst this is not linked to TPR, it nonetheless provides an example of the ways in which statutory bodies and regulators do not always operate compatibly and for the benefit of consumers.

Government has set an objective to cut the administrative costs of regulation on businesses by 25% by the end of this parliamentary term but from a pensions perspective, the costs and resource overheads are increasing. The regulators should play an important role in helping government achieve this ambition.