INSURTECH UK RESPONSE **DECEMBER 2024**

Financial Services Growth & Competitiveness Strategy

- Call for evidence paper here
- Consultation deadline 12 December
- Submission link here
- Insurtech UK answers highlighted in yellow

Stakeholder questions

Question 1: Which of the following statements best describes you as an individual or as an organisation:

a) **Academic**
b) **ConsumerGroup**
c) **Government or Mayoral Authority**
d) **Individual**
e) **TradeBody**
f) **Trade Union**
g) **Financial Services Organisation**
h) **Other–pleasespecify**

Non-applicable questions

Additional Questions for Financial Services Organisations

We are keen to establish the different challenges and opportunities for businesses right across financial services. Therefore, we ask financial services organisations to provide additional background on their size, location and part in the sector.

Question 2: Which of the following best describes your business:

a) Established Player
b) Mid-TierFirm
c) Scale-Up
d) Start-Up
e) Other–pleasespecify

Question 3: Which of the following UK regions do you:

a) operate out of: i) North East, ii) North West, iii) Northern Ireland, iv) Scotland, v) Wales, vi) East Midlands, vii) West Midlands, viii) East of England, ix) London, x) Yorkshire & the Humber, xi) South East, xii) South West.

b) have headquarters: i) North East, ii) North West, iii) Northern Ireland, iv) Scotland, v) Wales, vi) East Midlands, vii) West Midlands, viii) East of England, ix) London, x) Yorkshire & the Humber, xi) South East, xii) South West.

If you/your organisation is not headquartered in the UK please provide the country and city of your organisation's headquarters.

Question 4: Which part of the financial services sector does your organisation operate in? Please check all the markets in which your organisation operates. Separately please indicate which of these sub- sectors or market you consider your firm to primarily operate in.

a) AssetManagement
b) FinancialAdvice
c) Financial Market Infrastructure
d) FinTech
e) Insurance/Reinsurance
f) Investment Banking
g) Mutual/Cooperative
h) PaymentServices
i) Pension Fund
j) Retail Banking
k) SustainableFinance
l) Other – please specify

Question 5: How many employees are in your organisation: a) intheUK?

i. Micro (0-9)
ii. Small (10-49)
iii. Medium (50-249)
iv. Large (250+)

b) in

i. Micro (0-9)
ii. Small (10-49)
iii. Medium (50-249)
iv. Large (250+)

an overseas branch, subsidiary or headquarters?

Question 6: Do you intend to take on additional staff in the next 12 months?

Question 7: Are you planning to:

- Invest more in your UK business in 2025 than in 2024?

- Invest roughly the same amount in your UK business in 2024 as in 2023?
- Invest less in your UK business in 2024 than in 2023?

What are the reasons behind the answers you gave to the above questions? What opportunities/growth areas are you investing in?

Objectives and Approach:

Question 3.1: Do you agree with the proposed objectives set out in paragraph 3.6?

For info: Para 3.6 In the context of the focus on growth and competitiveness, the government's proposed objectives for the strategy are to deliver a credible 10-year plan that will ensure the UK:

is a place where financial services firms can invest and grow with confidence, and the location of choice for international firms;

supports the start-up and scale up of innovative new types of financial services;

provides financial services firms with access to a highly-skilled workforce;

has sustainable growth in the financial services sector across all regions and nations;

continues to be a world leading sustainable finance centre and the global destination of choice for firms to raise green capital; and,

takes advantage of new export markets while maintaining existing strengths, increasing its global share of financial services exports.

Yes we support the proposed objectives.

In terms of supporting the start-up and scale up of innovative new types of financial services it will be important for government policies to acknowledge and support the wide range of factors which influence a positive business environment for innovative entrepreneurs to grow their businesses. As covered in this call for evidence, this includes stable economic conditions, enabling regulation, and a highly-skilled workforce, but also needs to include access to finance - in terms of both domestic and overseas investors - to provide the capital required to make new firms, products and services a successful, sustainable reality.

Non-applicable questions

Growth and Competitiveness:

Question 3.2: [For Financial Services Organisations] For firms operating in more than one jurisdiction, what are the main drivers affecting your decisions on where to invest?

Future of Financial Services:

Question 3.3: What do you consider to be the most important trends or changes likely to affect the financial services industry over the next 10 years?

- Incumbents partnering with innovative new firms to design and distribute new products to customers or to drive efficiency and productivity improvements through their operations
- Financial services increasingly embedded into wider retail products and services
- Developments driven by Artificial Intelligence and ever-increasing capabilities within data analytics
- Digital identities removing friction from onboarding and facilitating fraud prevention

Policy Pillars

Question 4.1: Do you agree with the list of policy pillars that the government intends to focus on? Are there other areas that should be included?

For info - Policy pillars: ***The government has identified five core policy pillars central to the sustainable growth of the sector:***

Innovation & Technology: enabling and supporting increased digital adoption, including technologies such as Artificial Intelligence (AI), which have the potential to increase productivity and open up new products and services.

Regulatory Environment: ensuring there is a robust and transparent regulatory framework that supports growth while also maintaining financial stability, ensuring that markets function well, protecting consumers and promoting competition.

Regional Growth: promoting growth across all regions to ensure the benefits of the UK's financial sector are felt by citizens nationwide.

Skills & Access to Talent: ensuring a strong pipeline of homegrown talent and that the UK remains an attractive destination for top talent internationally.

International Partnerships & Trade: maintaining the UK's success as a global financial hub through strong trade arrangements and international leadership on financial regulation.

Yes. We would encourage the government to be more ambitious in the pillar for Innovation and Technology. This may already be implied, but the Financial Services growth strategy should not just support digital adoption by incumbents, but also be creating the right conditions for the new digital solutions that are available and attractive to incumbents to adopt to be new ideas, concepts and services designed, developed and delivered by innovative UK-based companies.

Question 4.2: Please rank the list of pillars in order of importance to your business or organisation for

i) day-to-day operations

1. **Innovation & Technology**
2. **Regulatory Environment**
3. **Skills & Access to Talent**
4. **International Partnerships & Trade**
5. **Regional Growth**

and ii) longer- term plans for investing in the UK:

As above

Question 4.3: How well is competition currently working in the financial services sector, and how can it be improved?

Whilst there have been a number of newly authorised insurance firms in the UK in recent years, these are much more likely to have been branches or subsidiaries of existing international companies receiving licences to operate in this jurisdiction, rather than new insurance firms that have started and scaled within the UK.

There is however appetite from the industry to achieve this, and as the UK insurtech sector matures, scaling insurtechs (often operating as Managing General Agents) are looking to transition from intermediary status to being an authorised carrier. A full licence allows them to control the entire insurance value chain, without being constrained by partnering with existing insurers that provide their underwriting capacity, but the current authorisation process was not designed with insurtechs in mind, which can lead to a lengthy, often prohibitive, application process. Challenges include the speed and expense of the process which can take at least 12 months meaning an agile, more accelerated authorisation process is needed.

The regulatory conundrum often exists of needing to demonstrate business operations are in place to be licenced, whilst investment and senior hires can be reliant on obtaining authorisation. There is also a live debate about the regulatory requirements insurtechs should have to meet in their early stages, as in some cases initial capital requirements have seemed high given the size and implied risk of the firm, or reinsurance limits seemingly capped too low.

Regulators are alive to this issue and have been considering what more can be done to enable new entrants. The PRA have established a new Insurer Start-Up unit, and a new 'mobilisation regime' has been proposed. This aims to provide the certainty of being authorised as new insurers complete their final set up, with modified entry requirements (e.g. lower capital floor, amended governance and reporting requirements), on the basis of time-limited restrictions on activities (e.g. only effecting insurance contracts with net exposure below £50,000, maximum policy term of 2 years, and on a claims-made basis - and no liability insurance).

These are all welcome developments, and Insurtech UK continues to work collaboratively with government and regulators on these issues. The next steps will be to successfully introduce these measures in a manner which truly enables the competition and innovation they seek to promote, and interacting with the sector to review the regime as necessary.

Clear guidance and communications will be needed as the new mobilisation regime is introduced and embedded from 1 Jan 2025, and consideration should be given to developing a "small insurer" prudential framework (akin to the strong and simple framework for non-systemic banks) to prevent a regulatory cliff-edge in the future as smaller insurers that have been licensed under the mobilisation regime scale their operations and graduate from these initial arrangements.

Another route to market for new entrants is the Appointed Representative scheme, whereby appointed representatives carry out regulated activity under the responsibility of an existing firm that already has FCA authorisation. This can allow new entrants to operate under the banner of another firm as they start and scale, encouraging effective competition. Where smaller businesses can operate under one banner, this also helps to remove an initial reliance on larger, traditional insurance firms who are ultimately their competitors.

This is a valuable route to market access. It has been used in the early days of many successful UK insurtechs, and may also be instrumental in enabling the increasing trend towards embedded insurance.

Throughout 2024 the FCA has, rightly, been exploring stricter measures to ensure the principal firm's oversight is more structured and effective. Whilst there is industry consensus on ensuring the regime is not exploited with transparency to consumers at its heart, it is vital for the sake of future competition and diversification of operators and distributors that this channel remains open and workable. A trusted Appointed Representative scheme will also be vital from the perspective of increasing accessibility of embedded insurance, which we noted above as a key trend set to increase in the next decade, and which in many cases is enabled via the AR route.

Innovation and Technology

Question 4.4: What is your assessment of how effectively the UK supports innovation and the adoption of new technology? What could be improved in the financial services sector?

Innovate UK grants

Innovate UK grants are supporting the development and adoption of new digital approaches in insurance. Insurtech UK welcomes this grant funding available to facilitate new research and products within the UK insurance sector.

After an initial tranche of funding for Professional and Financial Services that ran until 2022, Innovate UK launched a new Next Generation Fund of £26.5 million to help PFS sectors, including insurance, to develop and use digital technologies. Its aim is to facilitate projects which will deliver better products and services, increase access to services, and make these services more effective for the customer. Projects supported to date include identifying and removing bias from telematics used within car insurance, practical insights on AI adoption in insurance for both firms and regulators, and scoping new insurance policy cover for cyber protection for small businesses.

The value and positive impact of Innovate UK's Professional and Financial Services programme supporting research and development in insurance should be recognised and expanded in future spending rounds.

Establishing further government-backed reinsurance pools

Building on schemes such as Flood re and Pool Re, further government-backed reinsurance schemes providing underwriting capacity could provide vital tools to ensure availability of innovative insurance products.

These schemes could encourage insurance protection to tackle new societal challenges, or cover those risks which are not catered for on the commercial market.

New areas which need new approaches to insurance cover include the space industry, and cyber crime, as well as developments in medical devices and medicines. Advancing climate risk may increasingly become unaffordable to insure on traditional terms, necessitating action beyond the solutions that already exist to recognise this such as Flood Re.

It also presents an opportunity to tackle questions of financial inclusion, for example there could be scope for government to act as the backer of last resort for premium defaults on certain products or for certain cohorts. This could address the poverty premium in insurance highlighted by Fair by Design, whereby monthly payments can often be higher than a one-off annual payment, costing those with the least the most.

Question 4.5: Which technologies do you think have the most potential to transform financial services over the next 10 years? And in which financial services sectors or functions do you see these being applied most effectively?

Whilst insurtech is by no means limited to companies specialising in data analytics and AI, a significant proportion of insurtech firms fall into this category and are using technologies of this nature to revolutionise the insurance value chain - from inclusion in the customer journey starting at quotes and underwriting processes through to onboarding, to more efficient, streamlined claims processing.

The use of real-time sensors accompanied with the availability of big data is also already changing the data sources and assumptions underpinning underwriting from either individual retail policies through to large scale commercial agreements, and has potential to disrupt traditional practices even further.

Regulatory Environment

Question 4.6: What is your assessment of the UK's current regulatory environment?

For prudential matters please see response to question 4.3

Question 4.7: How can regulation support responsible and informed risk-taking?

Regional Growth

Question 4.8: [For Financial Services Organisations] What are the three most important factors, ranked in order, that you consider when making an investment location decision within the UK?

Question 4.9: How can we capitalise on synergies between different regional financial services hubs to support growth?

The UK is home to the world's second largest insurtech cluster, with 280 insurtech firms identified in Insurtech UK's 2023 sector study led by McKinsey The United Kingdom - the Nexus of Insurtech. One third of all UK insurtechs are based outside of London, with emerging clusters in northwest England, the south and Wales.

UK insurtech has an estimated combined value of more than £20 billion, making it the third largest globally after the USA and China, with an annual revenue of

£2-3 billion. The sector directly employs a diverse workforce of 14,000 people. More widely, the sector makes a significant contribution of almost £5 billion to the UK economy (GDP) and supports 60,000 jobs across the UK.

Bringing together the expertise, ideas, the networks and ambitions of regional insurtech hubs to interact with one another would bring opportunities to further strengthen the UK's leading international position in insurance innovation - for example facilitating exchanges of information and skilled professionals between Norwich and Cardiff, or between the North-West and London. This potential for learning and mutual reinforcement of the sector across regions is an area Insurtech UK would be keen to explore further in conjunction with the wider insurance industry and HM Treasury support.

Skills and Access to Talent

Question 4.10: What is your assessment of the UK's ability to attract global talent to the financial services sector?

Many UK-based insurtech entrepreneurs come to the UK from overseas due to the size of its insurance market and the UK market having historically been viewed as a welcoming environment for business growth.

Insurtech UK welcomed the Chancellor's commitment in the Autumn Budget to work with entrepreneurs on a positive business environment in the UK. It was encouraging to see ongoing long-term commitment to the Enterprise Investment (EIS) and Venture Capital Trust (VCT) schemes incentivising private investment into start-up firms, as well as retaining R&D relief rates after a period of complex change, although this must be accompanied by clarity, consistency and confidence in the application of R&D criteria and administration.

However, other significant measures announced in the Budget run contrary to this ambition, with increases now due to Business Asset Disposal Relief (BADR), and Investors' Relief (IR) in 2025 and 2026, and to Capital Gains Tax (CGT) on shares with more immediate effect. It is vital that the mission for growth should create - not constrain - incentives for entrepreneurs - be they from the UK or elsewhere - to establish and grow their businesses here in the UK, recognising the jobs, tax revenue and innovation these produce as successful companies scale.

Question 4.11: What is your assessment of the UK's ability to effectively upskill and reskill domestic workers for roles in the financial services sector?

International Partnerships and Trade

Question 4.12: What barriers do international financial services firms face in either establishing and operating in the UK, or using UK markets?

Question 4.13: What opportunities should the government seek to advance through its international financial services relationships?

Expansion into international markets and offering products to customers in new jurisdictions can provide a channel for significant growth for UK insurtechs. Nearly 30% of UK insurtechs cited international expansion as the most promising opportunity facing their company (McKinsey, 2023).

Building on support for the sector from the Department for Business and Trade through the prior joint Statement of Intent, policymakers can continue to facilitate overseas opportunities for UK insurtechs through trade missions and international investor look-books, as well as more formal longer-term initiatives such as bilateral corridors or insurtech pathways.

Insurtech UK welcomes the existing proactive engagement with the Department for Business and Trade, and would like to see this build on further with a joint three year strategy for international promotion of UK insurtech to facilitate market access in key overseas jurisdictions and encourage inward investment, drawing on evidence of priority countries and positive past experiences with insurtech corridors.

USA consistently tops our member firms' ambitions for overseas expansion, followed jointly by European markets (due to geographical proximity and developed retail financial markets) and Australia and New Zealand (due to anglophone and structural similarities, although these present smaller market opportunities in their totality). These are then followed by other financial centres such as Singapore and Dubai which are known for being welcoming of financial innovations.

Priority Growth Opportunities

Question 5.1: Do you agree with the priority opportunities that have been identified?

For info: priority opportunities:

- **Fintech: Fintech opens the door for new products and services, reaching parts of the economy not reached by traditional financial services.**
- **Sustainable finance: The transition to a net zero, climate resilient, nature positive economy, and increasing demand**

for sustainable financial products globally, presents a real opportunity for UK financial services firms, who have already shown significant leadership in this area, as evidenced by London being ranked number one in in the Global Green Finance Index.[17]

- **Capital markets (including retail investment): The depth and breadth of UK capital markets is almost unparalleled. There is an opportunity to seize more global business, and to increase retail participation in the market, to the benefit of both investors and the wider economy.**
- **Insurance & reinsurance markets: As the world changes and new technologies and businesses grow, this presents as opportunity for the world-leading London insurance and re- insurance markets.**
- **Asset management & wholesale services: The UK's asset management and wholesale banking sectors are world-leading, managing the savings of millions of people, directing capital to the UK's fastest growing sectors, and anchoring financial and professional services in the UK. Shifting demographics, the rise of private markets, and the extent of cross-border activity, provide significant growth opportunities.**

Yes - with the inclusion of insurtech, which may currently be implicit but merits specific reference.. Whether you see insurtech as a sub-sector of fintech, or as an innovation-led critical segment of the insurance market, there is no doubt that insurtech has significant potential to drive further growth here and internationally for the UK financial services industry and should be explicitly named within one of these two priority growth opportunities.

UK insurtech has an estimated combined value of more than $20 billion, making it the third largest globally after the USA and China, with an annual revenue of £2-3 billion. The sector directly employs a diverse workforce of 14,000 people. More widely, the sector makes a significant contribution of almost £5 billion to the UK economy (GDP) and supports 60,000 jobs across the UK.

Since 2012 to Q3 2024 – the UK has had the highest number of insurtech transactions outside of the USA, and double that of France or Germany. Dealroom data shows that some of the top global B2B SaaS insurtech rounds in 2024 have been in the UK – Vitesse ($93m), hyperexponential $73bn, Supercede ($15m), and artificial ($10m), with this record share of funding being fuelled by AI driven products (FN5).

We believe this is just the tip of the iceberg in the potential for growth in this sector.

Question 5.2: Which of the following business areas and activities do you see:

a) For financial services firms: As high growth opportunities for your firm?

b) For other organisations/individuals: As high growth opportunities for the sector?

Please rank the below from 1 to 11, where 1 is the highest growth potential.

1. **Insurance/reinsurance**
2. **FinTech**

- **Asset Management**
- **Financial Advice**
- **Financial Market Infrastructure**
- **FinTech**
- **Insurance/Reinsurance**
- **Investment Banking**
- **Mutual/Cooperative**
- **Payment ServiceS**

- **Pensions**
- **Retail Banking**
- **SustainableFinance**
- **Other (please specify)**

Fintech

Question 5.3: What do you see as the most important ingredients for a thriving UK fintech sector in coming 10 years?

These are the most important ingredients for the UK insurtech sector, many of which mirror fintech requirements but may need nuance or specific adaptations to be most supportive for insurtech growth:

- A regulatory regime that enables more new entrants
- A progressive, enabling regulatory approach to emerging technologies
- An investment environment that facilitates funding
- Clear, consistent R&D tax relief

- Innovate UK grants to instigate innovative research
- Supporting scaling beyond the UK

Question 5.4: Which are the critical factors for success that are specific to the fintech sector to enable innovative businesses to succeed?

See response to question 5.3 above. Plus specifically on access to finance there are a number of issues which would facilitate funding for start-up and scale-up fintech and insurtech firms:

Criteria for Enterprise Management Incentives need to be updated

The Enterprise Management Incentive enables cash-constrained start-up companies to compete for talent with larger corporates through share-based remuneration, whilst giving staff a stake and say in the company's success.

To qualify for EMI a company must have fewer than 250 employees and less than £30 million in gross assets. This criteria has remained static for many years, and has not increased in line with growth or inflation, undermining the potential impact of the scheme and restricting its ability to also support companies through their vital scaling stage.

Qualifying criteria for EMI should be significantly increased from its current limit of £30 million of company gross assets to attract more experienced talent as insurtechs scale

Rules for Advance Subscription Agreements invalidate its effectiveness

An Advance Subscription Agreement enables the investor to provide finance to a start-up in return for the right to purchase shares in the company at a later date, often when the company seeks its first round of equity funding.

If there is no funding round within an agreed amount of time (long stop date) then the investment will no longer be eligible for SEIS/EIS tax relief. In 2019 HMRC changed the long stop date from 12 months to 6 months, impacting the fundraising efforts of those insurtechs who are eligible for SEIS/EIS.

However, recent research by Insurtech UK and McKinsey highlights that deals are currently taking longer as investors undertake more thoughtful due diligence, looking not just at top-line growth potential, but also profitability, unit economics and predictability. The impact of this means insurtechs and other start-ups are having to rush valuations and accept sub-optimal terms. The FCA could also helpfully clarify using ASA as regulatory capital, which should be permitted due to its loss absorption capacity.

The long-stop date for Advance Subscription Agreements should be re-extended back to 12 months, removing the additional pressures this has created to conclude accelerated funding rounds

All insurtechs should be able to take advantage of SEIS and EIS investment incentives

Many insurtechs remain unable to take advantage of this initiative. The Seed Enterprise Investment Scheme (SEIS) and the Enterprise Investment Scheme (EIS) incentivise private investment into start-ups through favourable tax treatment. Whilst this is a successful scheme which has encouraged significant funds into the growth of UK companies, sectoral constraints on eligibility for financial services, including insurance, mean many insurtechs remain unable to take advantage of this initiative.

Following extensive engagement with HMRC, Insurtech UK welcomed updates to the EIS guidance in 2021 clarifying that Managed General Agents are eligible given they do not directly underwrite insurance risk as a carrier.

The wealth of firms within the insurtech sector is however much broader than MGAs, and expanding this relief to all insurtech companies would provide increased levels of much sought after investment for insurtechs to start and grow, as well as levelling the playing field relative to other technology companies. It would also remove a prohibitive hurdle to increasing competition within the insurance sector, as for growing MGAs considering converting to being an insurance firm in their own right becoming a regulated company would currently invalidate their EIS status.

Reducing inconsistencies in tax treatment for insurtech

A large proportion of UK insurtechs are intermediary businesses such as Managing General Agents or brokers. These are not fully licensed insurance firms in their own right. Rather they use their digital and tech skills to provide a much-improved consumer experience both in terms of purchasing insurance and making claims. The underlying financial cover is still provided by the insurer.

The insurtech intermediaries sell insurance policies directly to customers and in doing so collect Insurance Premium Tax on behalf of the insurer which passes to HMRC.

Insurtech intermediaries are currently deemed VAT exempt meaning they cannot reclaim VAT on their outgoings such as tech infrastructure, digital marketing or professional services. As a consequence these businesses are effectively paying 120% for 100% of a product or service, and have to raise 20% more capital than other start-ups. This can act as a disincentive to early stage investors to choose a business with a 20% levy on many costs, versus other UK-based tech sectors.

A fairer VAT/IPT regime is needed, enabling insurtechs to scale quicker and on a level playing field with other tech sectors.

Sustainable Finance

Question 5.5: In the UK's sustainable finance framework, as set out in the Chancellor's Mansion House package, do you see barriers or gaps that would support the growth and competitiveness of the UK sustainable finance market?

Question 5.6: What do you think should be the UK's priority when engaging with the global sustainable finance agenda, both bilaterally and at a multilateral level?

Question 5.7: What are the opportunities and barriers for the financial services sector in developing the products and/or services necessary to facilitate investment into the net zero transition?

For each opportunity, please provide an indication of the type of intervention required, for example developing guidance, or supporting the development of further capabilities.

Capital markets

Question 5.8: Are there any barriers to growth in capital markets that are not being targeted by existing government reforms? How can private and public markets be grown so that they best support UK growth?

Question 5.9: Are there any barriers to retail participation in UK capital markets? What more can be done to encourage consumers to invest in capital markets to a longer-term time horizon?

Insurance and re-insurance markets

Question 5.10: What are the barriers to insurers and reinsurers to growing their businesses and share of international markets?

See answer to Question 4.13 for UK insurtech international ambitions.

Barriers to international expansion for UK insurtechs include:

- need for greater information and advice on the regulatory, legal, tax and employment regimes in overseas jurisdictions, providing the foundations and confidence to invest resources in exploratory visits and due diligence

- requirements in some jurisdictions for a dedicated number of personnel to be situated in that country
- appropriate contacts within overseas incumbent insurers to generate sales leads and partnership opportunities

Question 5.11: What are the barriers to innovation in the UK's insurance markets?

- Legacy IT systems at incumbents
- Lack of incentives for the industry to change for the better
- Culture within incumbents - from status quo in product design and distribution through to procurement processes which are disproportionate to swift establishment of a pilot or proof of concept
- Funding to explore and accelerate new research opportunities
- Access to funding for insurtech entrepreneurs and new insurtech ventures
- Access to capacity for new insurance products and services
- An authorisation process which has not enabled innovative domestic MGAs to begin their journey as a fully-fledged insurer with a UK operating licence, driving solutions via Malta/Gibraltar/Channel Islands instead

Asset management and wholesale services

Question 5.12: What are the barriers to setting up and conducting business as a UK asset manager or conducting wholesale services in the UK?

Question 5.13: In what ways could the regulatory landscape for asset management or wholesale services adapt to the needs of organisations over the next 10 years?