MONEY AND MENTAL HEALTH POLICY INSTITUTE







OPEN TO EVERYONE?

Ensuring financial data sharing beyond open banking works for people with mental health problems

Kate Wells and Chris Lees

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About the authors

Chris Lees is a Senior Research Officer at the Money and Mental Health Policy Institute. He previously worked at Survation and British Future. Chris leads Money and Mental Health's research and policy work on essential services and regulation.

Kate Wells is a Research Officer at the Money and Mental Health Policy Institute. She previously worked at Citizens Advice as a debt caseworker and insolvency specialist working directly with vulnerable people. Kate supports Money and Mental Health's varied research work streams with a focus on welfare and employment and is leading on the second strand in this programme of work.

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"It helps me as it reduces the burden of sharing information. If I'm in a particularly bad patch I worry that it will show that I am in an episode and my finances are not great but it ensures accuracy whilst my head may not be that accurate."

- Expert by experience

Executive summary

Data sharing brings opportunities and risks when it comes to our money and mental health

- Across a range of markets, common symptoms of mental health problems, like difficulties with concentration and decision-making, can make it harder to get the best deal, access financial support or manage money. This can lead to people with common symptoms of mental health problems making managing money significantly harder, increasing the risk of financial difficulty and making it harder to access the right financial products and support.

- Sharing data about our finances has the potential to address some of those challenges and help people achieve their financial goals or get the support they need. For example by reducing paperwork, improving visibility over finances and facilitating access to more personalised products and services.

- This report is the second in a series exploring the opportunities and risks that data sharing presents for people with mental health problems, focusing on how people with lived experience actually experience and think about data sharing.

- This report specifically examines what open banking – a way of sharing financial data – has delivered for people with mental health problems, the concerns that remain and the lessons that should shape the future of open finance and wider financial data sharing.

Open banking is entering a new phase

- Open banking, which allows someone to securely share information from their current account or credit card with a trusted third party, has been a significant change to the financial services landscape.

- Since its introduction in 2018, it has enabled millions of people to use budgeting apps, affordability checks, account aggregation services and debt advice tools.

- The next phase of financial data sharing is beginning to take shape. The Financial Conduct Authority (FCA) has set out its vision for open finance, which would extend open banking into areas such as pensions, insurance and savings. Alongside this, the government is considering how future Smart Data schemes should be prioritised, governed and delivered across sectors such as energy, telecoms and beyond.

- This creates an important opportunity to reflect on how open banking has and hasn't delivered for people with mental health problems.

- The governance, standards and consumer protections being developed now will shape how people experience financial data sharing for years to come. Applying the lessons from open banking at this stage can help ensure the next generation of financial data sharing is designed around consumer outcomes from the outset, rather than having to retrofit improvements later.

Open banking has delivered real benefits, but not for everyone

- Our research found that open banking has delivered genuine benefits for many people with mental health problems.

- Members of our Research Community – a group of over 5,000 people with lived experience of mental health problems – consistently described valuing services that displayed their finances in one place, reduced administrative burden and helped them keep track of their finances. This was particularly the case during periods of poor mental health.

> "It makes banking easier to manage. I don't have to access each bank to make payments. I can see [all] available balance[s] and what I can afford to transfer."
>
> *– Expert by experience*

- Some Research Community participants, however, questioned whether these services were relevant to them. Others felt that concerns about trust, data misuse or digital confidence outweighed the potential benefits. Where sharing financial data feels risky or difficult, the benefits of open banking are most likely to be realised by people who are already confident engaging with digital financial services.

> "Maybe I'm not the target user type, maybe I'm just too poor for these services to be of benefit. Lack of regulation, historically poor behaviour of financial industry, issues over internet security, dismissiveness of how critical every penny can be and how long it takes to fix issues, seems more gimmick than realistically useful."
>
> *– Expert by experience*

People will only share where the benefits outweigh the risks

- Throughout the research, participants consistently weighed potential benefits against perceived risks when deciding whether to share financial data. While this is true for all consumers, mental health problems shift both sides of that balance. People with mental health problems may have more to gain from financial data sharing, but can also have more concerns or be at greater risk if something goes wrong.

- Financial transaction data was viewed as deeply personal, revealing not just balance totals but a detailed story of a person's daily life, habits, and moments of crisis. Many participants were concerned about fraud, cyber security, profiling and information being used beyond the original purpose for sharing.

- In particular, nearly three quarters (73%) of Research Community respondents who currently do not use open banking-enabled services said they were worried about security.

- Participants consistently prioritised safeguards that would give them greater visibility and control over their information. For people with mental health problems, these safeguards may be particularly important because confidence and ability to engage with financial services can fluctuate over time.

- Many people were already using open banking-enabled services without necessarily recognising them as such or understanding how their financial data was being shared.

- As financial data sharing expands, consumers want to receive clear explanations about what data is being shared, why it is being shared, and how they can review and manage it over time.

- Many consumers participate in financial data sharing out of necessity – to access essential services, credit, or debt advice – despite holding deep underlying discomfort. Trust is not the starting point for financial data sharing; it is the outcome of systems that provide clear benefits, meaningful control and visible accountability. Interpreting increased use of financial data sharing as a proxy for trust or comfort overlooks the concerns consumers continue to hold.

- Participants also wanted confidence that, if something went wrong, they would know who was responsible and where to go for help. Symptoms of mental health problems can make it harder to navigate complex systems for complaints or redress.

Many people with mental health problems remain uncomfortable about the future of financial data sharing

- Nearly seven in ten (69%) Research Community respondents felt uncomfortable about sharing additional financial information through future open finance services. Additionally, nearly six in ten (58%) felt uncomfortable about similar data sharing approaches expanding into sectors such as energy and telecoms.

- This highlights that engagement with today's services does not necessarily translate into confidence about future financial data sharing. As open finance develops and Smart Data schemes emerge across other sectors, increasing participation alone will not be enough to deliver meaningful consumer outcomes.

Learning the lessons before financial data sharing expands

- Open banking offers a timely opportunity to understand and apply the lessons to wider financial data sharing before it expands. The report identifies several lessons including:

  - » Consumers with mental health problems need meaningful control throughout the data sharing journey, not just at the point of consent.

  - » Future systems should be designed for real-world circumstances, recognising that people with mental health problems' cognitive bandwidth and ability to engage can change. Although this report focuses on mental health problems, these principles are likely to benefit many other consumers as well.

  - » Stronger safeguards are required for transaction data, given how much it reveals about a person's day-to-day life.

  - » People who choose not to share their financial data should not be disadvantaged as a result.

Recommendations for how to get financial data sharing right for people with mental health problems

In this report we make recommendations to the government, regulators and industry to ensure financial data sharing develops in a way that works for people with mental health problems. However, many of the issues identified in this report are not unique to people with mental health problems. Designing financial data sharing around clearer information, meaningful control and stronger safeguards is likely to improve the experience for many other consumers too.

These recommendations include:

- **The Department for Business, Innovation, Science and Trade (BIST), the Financial Conduct Authority (FCA) and the Information Commission (ICO)** should establish a clear consumer protection, accountability and redress framework for financial data sharing.

- **The Future Entity** (which is being established as the standards-setting body for open banking and designed to support future expansion into open finance) and other Smart Data scheme-governance bodies should implement and support that framework within their respective remits.

- **The FCA and future open finance governance bodies** should apply clear consumer-outcomes criteria when determining priorities for open finance, particularly for people with mental health problems and other groups in vulnerable circumstances. DBIST and future Smart Data governance bodies should apply equivalent criteria when developing new Smart Data schemes and sector use cases.

- **The Future Entity** should review and strengthen the Customer Experience Guidelines so they remain fit for the next phase of open banking and provide a foundation for future open finance arrangements.

- **The FCA, BIST and the Competition and Markets Authority (CMA)** should ensure that choosing not to share financial data does not create a "Privacy Premium" in which not sharing leads to receiving poorer outcomes, incurring higher costs or reduced access to products and support.

- **The FCA and BIST** should establish shared expectations for supportive design. Future financial data sharing journeys should help people understand information, make informed decisions and remain in control, recognising that confidence, circumstances and support needs can change over time.

- **The Future Entity, FCA and ICO** should strengthen safeguards around profiling, harmful inference and secondary uses of financial data, ensuring consumers understand how their information may be analysed and used.

Open banking has demonstrated what financial data sharing can achieve. As open finance and wider Smart Data schemes develop, there is an opportunity to apply those lessons from the outset. The benefits of financial data sharing will only be fully realised if people understand what they are sharing, feel in control of their information and have confidence that it will be used fairly and responsibly. Ultimately, success will be measured by whether financial data sharing helps people achieve better outcomes and improves their lives.

"I spend less time chasing my tail trying to keep my bank account in the black and pay my bills. Seeing your latest little splurge sitting on top of your regular costs reminds me not to do it too often."

– Expert by experience



Introduction

Our work on data sharing

A key theme from the research we have conducted over the last 10 years is that consumers with mental health problems can face challenges finding the best deals in essential services markets, like financial services and telecoms, or accessing financial and non-financial support.[1] In part, this can be due to the impact of common symptoms of mental health problems like difficulty processing information or reduced attention span.

But it can also be caused by markets, products and services that aren't designed to meet people's needs and require people to take significant steps to find the best deal or access support. With technology continuing to develop at pace, data is becoming an increasingly important part of how we access products, services and support.

This report is the second in a multi-year programme exploring how data sharing can improve outcomes for people with mental health problems while ensuring appropriate safeguards are in place.

Our first report examined the sharing of support needs across essential services.[2] It found that many people saw clear benefits in not having to repeatedly explain their circumstances to different organisations. However, it also highlighted the importance of building trust through meaningful choice, transparency and control.

This second report focuses on open banking, the UK's most established consumer-enabled financial data sharing framework. By examining people's experiences of open banking, we identify lessons for the future of open finance and wider financial data sharing.

The programme will conclude in 2027 by bringing together findings from both reports, alongside further exploration of other data sharing use cases, to develop principles and recommendations for data sharing across sectors.

The open banking revolution

Since its introduction in 2018, open banking[3] has changed how people can share their financial information. More than 18 million people in the UK actively use open banking services,[4] and the original Open Banking Roadmap, which set out the technical standards and functionality needed to establish the ecosystem, has now been fully delivered.[5]

1 Holkar M and Lees C. Convenience at a Cost: Online shopping and mental health. Money and Mental Health November 2020.

2 Lees C and Wells K. Stuck on repeat: Making it easier for people with mental health problems to share support needs across essential services providers. Money and Mental Health March 2026.

3 Open banking is the secure technological piping behind sharing financial data and its original purpose was to create market competition and boost financial innovation. It was designed to break the dominance of traditional banks by allowing securely authorised third-party apps to access financial data and initiate payments via Application Programming Interfaces (APIs) which acted as a software bridge between systems.

4 OBLTD June 2026 usage analytics *Open Banking is unable to identify individuals consuming services through more than one brand. Reporting therefore represents the number of user connections with the brands providing reporting, rather than individual users. https://www.openbanking.org.uk/news/open-banking-surpasses-one-billion-payments-and-100-billion-api-calls

5 Open Banking Limited (2024), CMA confirms full completion of Open Banking Roadmap, unlocking a new era of financial innovation, 9 September 2024.

Consumers can now securely share current account or credit card data with regulated third-party providers. This has enabled a growing range of products and services, including:

- Budgeting apps
- Affordability checks
- Account aggregation and financial dashboards
- Saving top-ups
- Credit building
- Use in debt advice and support services

It has created increased visibility of finances which could lead to greater control and empowerment over our financial data. But a question remains whether these benefits have been realised widely among those most in need of greater simplicity and support, or if innovation has mainly benefited those who were already financially confident, digitally engaged and not in vulnerable circumstances.

A step change in financial control for people with mental health problems?

For people with mental health problems, open banking and the future of financial data sharing do have the potential to bring significant benefits. Managing money can become much harder during periods of poor mental health, which for many people can fluctuate. Almost one in five (18%) people with mental health problems are in problem debt. People experiencing mental health problems are three and a half times more likely to be in problem debt than people without mental health problems.[6]

Common symptoms, including difficulties with concentration, memory and decision-making, can make it harder to keep track of finances, engage with financial services and access support. Financial data sharing could reduce some of these burdens by making it easier to demonstrate financial circumstances, reduce paperwork and simplify financial tasks, such as monitoring multiple accounts.

However, these same systems can also rely on people feeling confident sharing highly personal financial information, understanding how their data will be used and remaining able to manage that sharing over time. Financial data can also reveal far more than just information about someone's finances, including moments of money and mental health problems. As financial data sharing becomes more common, it raises vital questions about privacy, control and what happens if you do not want to share.

People with mental health problems may be among those who stand to benefit most from financial data sharing systems but they are also among those most exposed to harm if these systems are poorly designed. While this report focuses on people with mental health problems, many of the lessons around trust, accountability and meaningful control are likely to improve financial data

6 Holkar M. Debt and mental health: A statistical update. Money and Mental Health Policy Institute, March 2019.

sharing for consumers more broadly, particularly those who also benefit from clearer information, greater control and more accessible services.

Why now?

The views and experiences of people with mental health problems need to be considered if the next phase of financial data sharing is to work for them and many other vulnerable consumers.

Many households continue to face financial pressure from the cost of living. Consumers are looking to make their money go further and ensure they can control and manage when budgets are squeezed.[7] At the same time, policymakers are looking to digital innovation to improve financial services and drive economic growth.[8] This makes it even more important that future financial data sharing focuses on delivering meaningful, positive outcomes for consumers, rather than simply increasing data sharing or driving innovation for its own sake.

During the course of this research, the regulator for financial services, the Financial Conduct Authority (FCA), published its Open Finance Roadmap,[9] and the government published its Smart Data Strategy.[10] Additionally, work is ongoing to establish a permanent Future Entity[11] as the standards-setting body for open banking. While its initial remit is focused on open banking, the FCA has said that its role may evolve to expand into open finance in the future.[12] At the same time, the government is considering governance arrangements for future Smart Data schemes. Research commissioned by the Department for Business, Innovation, Science and Trade (BIST) in January 2026, recommended a federated model combining sector-specific implementation bodies with a central coordination entity, while the government's current call for evidence is seeking views on future governance and institutional arrangements.[13]

The policy landscape is moving quickly but remains unsettled. Decisions about the remit of the Future Entity, the development of open finance and the governance of wider Smart Data schemes are progressing through different processes. The structures chosen now could shape consumer experiences of financial data sharing for many years, making this an important opportunity to embed consumer protection and lived experience before new arrangements become established.

Open banking is now mature enough to understand what has worked well, where concerns remain and what lessons should inform the next phase of financial data sharing as new frameworks become established.

7 Office for National Statistics, Public opinions and social trends, Great Britain: June 2026, 17 July 2026. The cost of living (88%) is the most commonly reported issue facing the UK today.

8 Financial Conduct Authority, Response from the Financial Conduct Authority, responding to HM Treasury's Recommendations for the Financial Conduct Authority (November 2024), July 2026.

9 Financial Conduct Authority, Open finance roadmap: our vision for a smart data future.

10 Department for Business and Trade, Smart Data Strategy: unlocking the power of data for consumers and businesses. March 2026.

11 KPMG, Open Banking Future Entity Industry Evaluation Recommendation Report, published by the Financial Conduct Authority. 2026.

12 Financial Conduct Authority. FS25/4: Design of the Future Entity for UK Open Banking. July 2025.

13 Department for Business, Innovation, Science and Trade, Research into governance models for Smart Data, January 2026; Department for Business, Innovation, Science and Trade, Smart Data: Multi-sector Call for Evidence, July 2026.

This report

This report explores how people with mental health problems experience open banking and how those experiences can inform the future development of open finance and wider financial data sharing. When it comes to these experiences, we draw on our Research Community, a group of over 5,000 people with personal experience of having a mental health problem or of caring for someone who does.

Throughout the report we consider what these experiences mean for the future development of open finance and wider smart data initiatives. We also explore what people with mental health problems think about sharing their financial data, including any key concerns. Rather than assuming that expanding financial data sharing will automatically improve consumer outcomes, we examine the conditions needed to ensure future systems work for people with mental health problems.

We do not assess the technical performance of open banking or the success of individual apps or services, but instead examine how people with mental health problems experience and think about financial data sharing in practice.

As this is part of a series of reports about the sharing of data, this report does not examine open banking payment initiation. This report focuses on the use of open banking to share financial information with third-party providers and how consumers experience the sharing, use and ongoing management of their financial information.[14]

The report is structured as follows:

- Section 1 examines the extent to which open banking has delivered meaningful benefits for people with mental health problems at scale.
- Section 2 examines the key concerns people with mental health problems have about financial data sharing, including the trade-offs they identified between potential benefits and risks.
- Section 3 considers how those lessons relate to current policy developments, including the Open Finance Roadmap, the Smart Data Strategy and the Future Entity vision.
- Section 4 sets out recommendations for government, regulators and industry to help ensure current and future financial data sharing works for people with mental health problems.

In sections 1 and 2, we have drawn out key lessons that can be learnt from open banking and consider what they mean for future data sharing.

14 We use 'financial data sharing' primarily to refer to data shared through open banking and future open finance arrangements. We also consider what the lessons from these systems may mean for similar Smart Data schemes in other sectors.

Methodology

This report draws together evidence from several sources to understand how people with mental health problems experience and think about open banking and financial data sharing:

- A survey of 234 members of Money and Mental Health's Research Community exploring awareness, use and experiences of open banking, together with attitudes towards future financial data sharing. This was conducted between 22 October and 10 November 2025.
- An online focus group with six members of the Research Community to explore experiences of open banking and views on future open finance in greater depth. This took place in January 2026.
- Analysis of external national datasets including the FCA's Financial Lives Survey 2022 and The Money and Pensions Service (MaPS) Debt Need Survey 2023 to compare the experiences of people with mental health problems with those of the wider population.
- A roundtable attended by representatives from financial services, fintech, regulators, government and consumer organisations in March 2026.
- Interviews and discussions with experts working across open banking, open finance and smart data.
- A review of relevant academic literature, policy developments and regulatory publications relating to open banking, open finance and smart data.

The report also draws on previous Money and Mental Health research where relevant to provide wider context.

Further information on the research methodology is provided in the methodological annex.



"My mental health is pivotal in how I decide to manage my finances. At times I can be too trusting and other times I can be too sceptical..."

– Expert by experience

Section 1: Has open banking delivered for people with mental health problems?

Open banking is intended to give people greater control over their financial data, potentially reducing administrative burdens and supporting better financial decision-making. It may also enable more personalised support through improved understanding of customer experience.[15] For people with mental health problems, these benefits could be particularly significant.

Our previous research has shown that mental health problems can affect concentration, memory, planning and decision-making. This can in turn make it harder to manage finances and engage with financial services.[16] Our research has also demonstrated how financial technology has the potential to make money management easier during periods of poor mental health.[17]

This section explores how far the promise of open banking aligns with the experiences of people with mental health problems in practice. Throughout, it also considers what these findings mean for the future development of financial data sharing.

1.1 Awareness and take-up

Despite almost a decade of open banking, current awareness is low among Research Community members. Just under half (47%) of survey respondents said they had heard of Open Banking, while 53% said they had not.[18]

However, use of open banking-enabled services was considerably higher than awareness alone might suggest. Around three-quarters (74%) of Research Community participants had used at least one open banking-enabled service,[19] [20] suggesting many people are benefiting from these services without necessarily recognising them as open banking.

On a national level, our analysis of the Financial Lives Survey found that people with mental health problems are slightly more likely to use open banking services than those without mental health problems. 16% of people with mental health problems reported having used open banking-enabled services, compared with 11% of people without mental health problems.[21]

This lower level of reported use in the national data set is likely to reflect differences in how use was measured, as well as differences between the two samples. Our Research Community survey asked about a broader range of services that use open banking, including budgeting,

15 Reynolds F, Open Banking and Mental Health: Transforming More Than Payments. Open Banking Limited,. 2019; Semple B, Can Data and AI Help Break the Link Between Money and Mental Health Problems?, Money and Mental Health Policy Institute. 2019; Evans K, Open banking and mental health. Money and Mental Health Policy Institute, 2022.

16 Holkar M and Mackenzie P, Money on your mind, Money and Mental Health Policy Institute, 2016.

17 Evans K and Acton R, Fintech for Good, Money and Mental Health Policy Institute, 2017.

18 Money and Mental Health survey of 234 people with lived experience of mental health problems.Base for this question: 213 people with mental health problems excluding those who answered "Don't know."

19 Money and Mental Health survey of 234 people with lived experience of mental health problems. Base for this question: 211 people with mental health problems excluding those who answered "Don't know."

20 Respondents were provided with a list of common products or services that require open banking permissions, before being asked if they had used any – see Figure 1 below for more details.

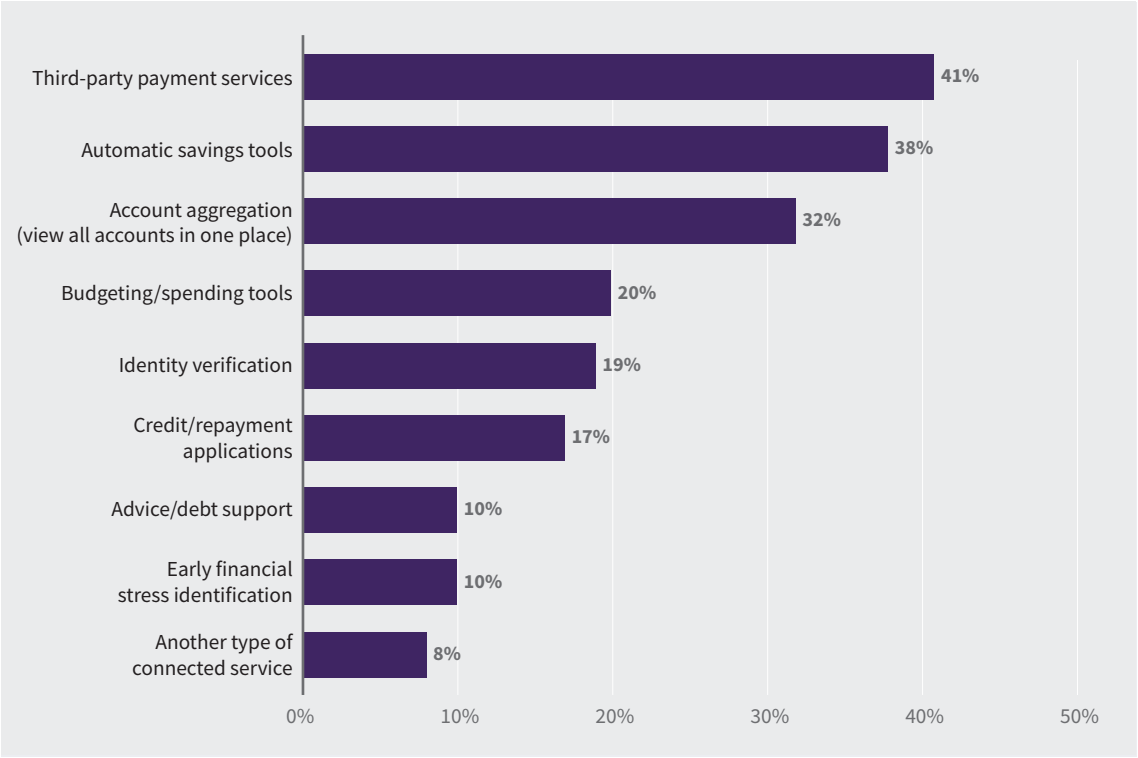
21 Money and Mental Health analysis of the Financial Conduct Authority's Financial Lives Survey data 2022.

payments, identity verification and debt advice, whereas the Financial Lives Survey focused on a smaller number of established use cases. Additionally, our Research Community is not a nationally representative sample and can be a more engaged group than the wider population.

Usage is higher for services that offer a clearer benefit

As shown by Figure 1, Research Community respondents reported using a range of connected financial services. This includes third-party payment services (41%), automatic savings tools (38%) and account aggregation services that allow users to view multiple accounts in one place (32%).[22]

Figure 1: Types of open banking-enabled services used by respondents



Source: Money and Mental Health survey of 234 people with lived experience of mental health problems. Base for this question: 221 people with mental health problems.

The most commonly used services offered a clear and immediate benefit, were relatively easy to understand and typically focused on helping people manage their money more effectively.

Importantly, almost one quarter (24%) of respondents reported that they had not used any of the listed services.[23] Among this group, interest in future use was low, with almost nine in ten (89%) saying they would not be interested in trying them.[24]

22 Money and Mental Health survey of 234 people with lived experience of mental health problems. Base for this question: 221 people with mental health problems. Respondents could select multiple options, so percentages do not sum to 100%.

23 Money and Mental Health survey of 234 people with lived experience of mental health problems. Base for this question: 221 including those who responded "don't know."

24 Money and Mental Health survey of 234 people with lived experience of mental health problems. Base for this question: 64 people with mental health problems who reported not using any of the listed open banking-enabled services.

Use alone tells us relatively little about whether people experience these services as useful or beneficial. Subsequent findings suggest that availability and take-up do not necessarily translate into positive experiences.

1.2 When open banking works: reducing burden and increasing visibility

When it came to the benefits that open banking provided, Research Community respondents were more likely to describe practical benefits that made managing money feel easier, clearer and less overwhelming.

Improved visibility of finances

Respondents frequently described the importance of visibility. Being able to clearly see their finances helped them feel more in control and confident, making it easier to understand their spending and monitor account balances.

> "It makes banking easier to manage. I don't have to access each bank to make payments. I can see available balance & what I can afford to transfer."
>
> *– Expert by experience*

Research Community members frequently described financial management as being cognitively demanding when they are unwell. Difficulties with concentration, memory and motivation make it difficult to keep track of transactions and balances. Some participants explained how they find it difficult to spot when their financial situation is beginning to deteriorate. Being able to see key financial information in one place is a way to maintain confidence and control.

> "I spend less time chasing my tail trying to keep my bank account in the black and pay my bills. Seeing your latest little splurge sitting on top of your regular costs reminds me not to do it too often."
>
> *– Expert by experience*

Reducing administrative burden

Alongside improved visibility, respondents frequently highlighted examples of reductions in administrative burden such as sharing financial information with credit or debt advice services without having to manually provide bank statements or detailed transaction histories.

Many described open banking-enabled services as helping them to:

- avoid repetitive tasks
- reduce paperwork
- simplify interactions with financial services

For some, these benefits were particularly crucial during periods of poor mental health, when managing administrative tasks could feel overwhelming or difficult to sustain.

> "It helps me as it reduces the burden of sharing information. If I'm in a particularly bad patch I worry that it will show that I am in an episode and my finances are not great but it ensures accuracy whilst my head may not be that accurate."
>
> *– Expert by experience*

These examples demonstrate the potential value of open banking.

1.3 Uneven benefits

While some Research Community participants described positive experiences, the benefits of open banking were far from universal.

While those participants valued having a clearer overview of their finances, others described financial information as a source of stress and anxiety, particularly during periods of financial difficulty. This may be especially important for people with mental health problems, who are over three times more likely to experience problem debt.[25] In some cases, the same feature could be experienced as either helpful for organisation, or harmful, causing anxiety or worry, depending on an individual's circumstances.

> "Tends to worry you more when you see overdraft balances and charges."
>
> *– Expert by experience*

Some participants highlighted the importance of timing and cognitive bandwidth.[26] For example, some respondents shared that open banking was most useful when they were already relatively well and able to engage with their finances. This was also reflected in our discussions with experts and highlights a significant tension. Open banking may help address some of the challenges associated with managing money during periods of poor mental health. However, those same challenges can also make it harder to engage with, trust and benefit from those services precisely when support is needed most.

> "When I was unwell and unable to budget, these services would not have made a difference. It's only when you start to recover that you can fix finances."
>
> *– Expert by experience*

This highlights a key lesson for the future of financial data sharing:

25 Holkar M and Mackenzie P, Money on your mind, Money and Mental Health Policy Institute, 2016.

26 Cognitive bandwidth in this sense refers to the finite mental capacity someone has available to understand information, make decisions and navigate complex systems.

Key lesson 1: Future systems should be designed for real-world circumstances

Future financial data sharing systems should be designed to work for the tens of millions of people whose needs, confidence and ability to engage fluctuate over time. In practice, this means designing services that provide meaningful control throughout the data sharing journey, explain information clearly and support people to make informed decisions when they need to, rather than assuming everyone can engage confidently at the point of consent. Without this, the benefits of open finance and wider financial data sharing are likely to remain concentrated among those who are already best placed to engage with digital financial services.

Participants stressed the importance of involving people with lived experience in the development of future frameworks and services so that their needs are embedded from the very beginning.

> "... these systems… should [exist] for the benefit of those who use them. They therefore need to be co-designed and reviewed constantly by those people. They should have features which will alleviate stress, issues, challenges and more which could exacerbate mental health conditions…"

– Expert by experience

Open finance systems must be built for real-world circumstances with real people, not ideal users.

Is open banking open to everyone?

The experiences of our Research Community suggest that making services available is only the first step. The success of open banking cannot be judged solely by its availability, but needs to also factor in whether people are able to benefit from enabled services in practice. Whether consumers experience these services as helpful, stressful or irrelevant is shaped by their circumstances and ability to engage at a particular point in time. As open finance develops and Smart Data approaches emerge in other sectors, these differences in experience will become increasingly important.

Section one summary

- **Open banking has delivered meaningful benefits for some people with mental health problems**, particularly by improving financial visibility and reducing administrative burden.
- **However, those benefits are not automatic**. Whether people benefit depends on their circumstances, confidence and ability to engage with digital financial services.
- **Making services available alone is not enough**. Future financial data sharing should be designed to work for people with different needs, levels of confidence and changing circumstances.

"When logging into online banking, I don't always recognise the names of the companies accessing my account via open banking – they seldom correspond with the name of the app / website I signed up with. This makes me worry that access to my account risks being taken advantage of fraudulently."

– Expert by experience



Section 2: The key concerns about financial data sharing for people with mental health problems

While there are clear benefits to open banking for people with mental health problems, our research also identified several factors that shaped participants' comfort and willingness to share their financial data. Research Community participants often described weighing potential benefits against perceived risks or discomfort. Their willingness to engage depended on having appropriate safeguards, clear information and meaningful control.

This section explores the key factors that shaped participants' confidence in financial data sharing and what these findings mean for the future development of open finance and wider Smart Data schemes. It considers:

- engagement without comfort or trust
- confidence and the sensitivity of financial data
- consent, control and confidence over time
- responsibility, accountability and redress

2.1 Engagement does not always mean comfort

Research Community members raised the following benefits:

- Being able to share once
- Making it easier to get support
- Ensuring providers better support people with mental health problems.

While many respondents were already using open banking-enabled services, reported comfort levels were consistently lower than current use. For example, only 23% of respondents who had used a budgeting tool connected to their bank accounts said they felt comfortable or very comfortable with using financial data sharing to help manage money in this way.[27] Similar patterns were evident across a number of other use cases such as affordability checks and receiving debt advice. Some participants described sharing financial information because it was necessary to access a service, despite ongoing concerns about how their information would be used.

> "... Made me feel on edge and having to give details out. With sometimes no option of another way…"
>
> *– Expert by experience*

27 Money and Mental Health survey of 234 people with lived experience of mental health problems. Base for use of budgeting tools: 44 people with mental health problems. Base for comfort with using financial data sharing to manage money or budgeting: 173 people with mental health problems. Comfortable combines "comfortable" and "very comfortable." Percentages exclude "Don't know" responses.

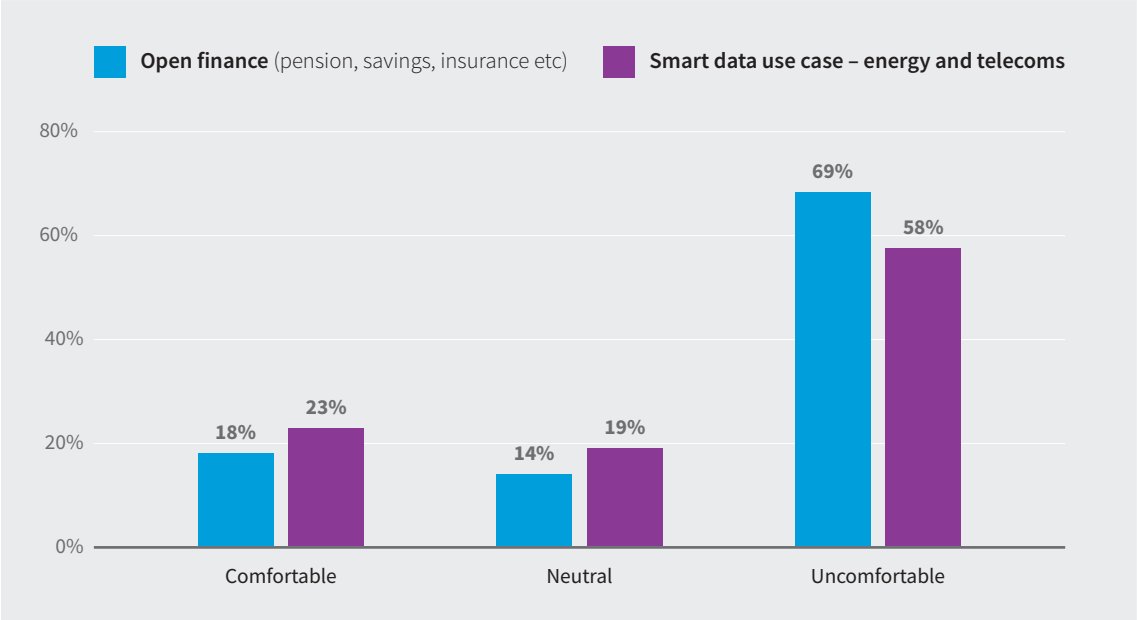
These findings suggest that adoption alone does not provide a complete picture of consumer confidence. Using a service does not necessarily mean people understand, trust or feel comfortable with the underlying data sharing arrangements.

Research Community members are uncomfortable about future financial data sharing

Figure 2 shows that this discomfort extends beyond current open banking services. When asked about future open finance and Smart Data schemes, almost seven in ten (69%) respondents said they would feel uncomfortable sharing additional financial information through open finance, while 58% felt uncomfortable about similar approaches expanding into sectors such as energy and telecoms.[28] This may reflect the particularly sensitive nature of financial information. Participants consistently described financial data as more than a record of transactions, viewing it as something that could reveal highly personal aspects of their lives.

Figure 2: Most respondents felt uncomfortable with future open finance and smart data services

Respondents' comfort with sharing additional financial information through open finance services and similar data sharing arrangements in energy and telecoms sectors.



Source: Money and Mental Health survey of 234 people with lived experience of mental health problems.[29]

At this early stage, open finance and Smart Data lack widespread, real-world use cases. Without concrete examples of personal benefit, participants naturally view expansion with a 'more data, more sharing' wariness. Expanding financial data sharing alone is unlikely to increase confidence or comfort.

28 Money and Mental Health survey of 234 people with lived experience of mental health problems. Base for this question: 141 people with mental health problems. Comfortable combines "comfortable" and "very comfortable"; uncomfortable combines "uncomfortable" and "very uncomfortable." Percentages exclude "Don't know" responses.

29 Base for sharing additional financial information through open finance: 149 people with mental health problems. Base for sharing information in energy and telecoms: 141 people with mental health problems. Comfortable combines "comfortable" and "very comfortable"; uncomfortable combines "uncomfortable" and "very uncomfortable." Percentages exclude "Don't know" responses.

2.2 Trust is conditional and financial data feels high-risk

Trust needs to be earned and maintained

Trust was a recurring topic throughout the research, but participants described it as highly conditional and dependent on context, purpose and perceived risk. Rather than being the starting point for feeling comfortable sharing financial data, trust was something that developed when there was a clear benefit, transparent information and appropriate safeguards. This is consistent with our earlier research which found that trust about sharing support needs with essential services depended on transparency, control and understanding across the data sharing pathway.[30]

This broader pattern is also reflected in national survey data. Our analysis of the Financial Lives Survey found that banks were the most trusted organisations among both people with mental health problems and those without. However, people with mental health problems were less likely than those without mental health problems to report high levels of trust (58% compared to 63%)[31] and almost twice as likely to report low trust (15% compared with 8%).[32] This suggests financial data sharing services should not assume consumers begin from the same level of trust and confidence. Instead, they should be designed to build trust through clear information, meaningful control and strong consumer protections.

Research Community participants also described how quickly trust could be lost. This was particularly the case where organisations could not clearly explain why financial information was being shared, what information would be accessed or who would be able to see it.

> "I didn't really understand who would see it, for example… could directors and staff see all my bank data? It was unclear what exact bits of my data I was sharing."
>
> *– Expert by experience*

As shown by Figure 3, among respondents who had not previously used open banking-enabled services, nearly three quarters (73%) reported concerns about security. Additionally, 70% said they would not trust such services with their information.[33]

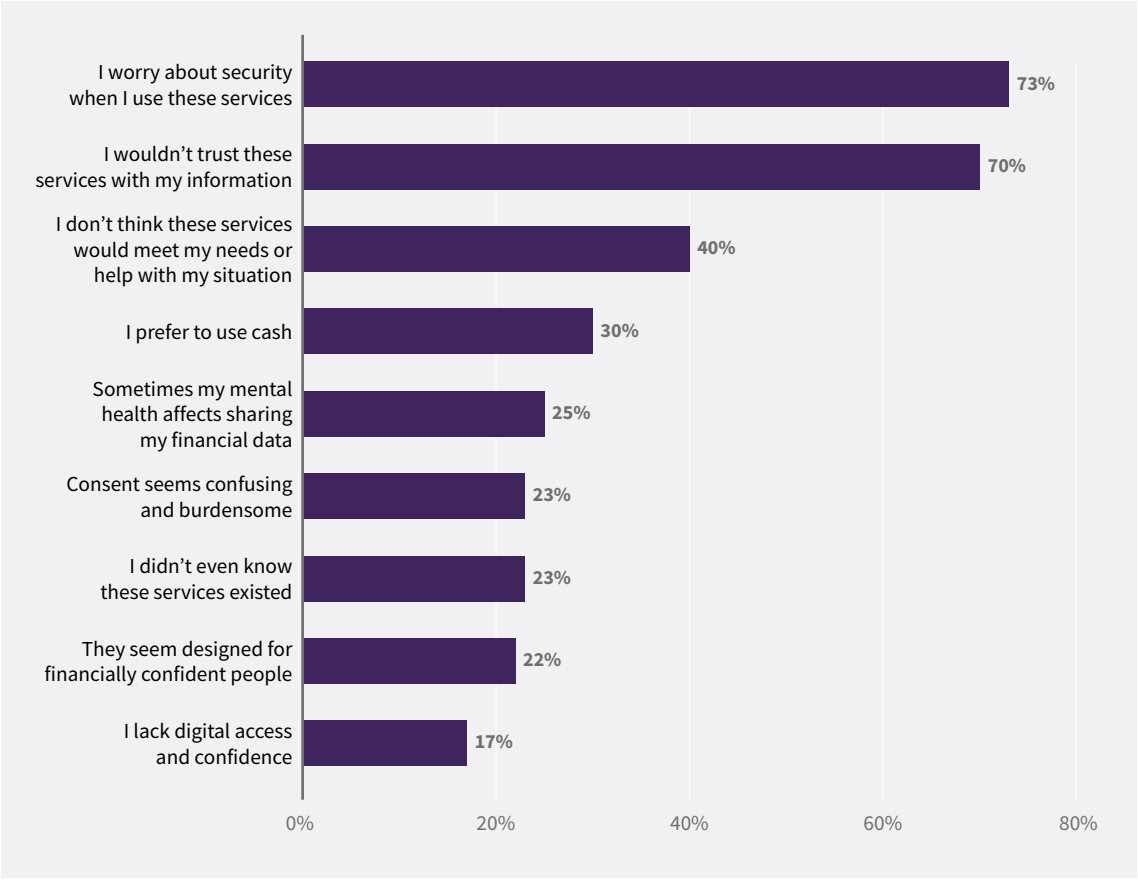
30 Lees C and Wells K, Stuck on repeat: Making it easier for people with mental health problems to share support needs across essential services providers, Money and Mental Health Policy Institute, 2026.

31 Financial Conduct Authority, Financial Lives Survey 2022. Money and Mental Health analysis. Moderate to high trust combines respondents scoring 4-10 on the FCA Financial Lives Survey's 0-10 trust scale. Low trust combines respondents scoring 0-3. "Don't know" responses are excluded.

32 Financial Conduct Authority, Financial Lives Survey 2022. Money and Mental Health analysis (trust in financial organisations), comparing respondents with and without mental health problems.

33 Money and Mental Health survey of 234 people with lived experience of mental health problems. Base for this question: 60 people with mental health problems. This was a select all that apply question.

Figure 3: Security and trust were key reasons why respondents had not used open banking-enabled services



Source: Money and Mental Health Research Community survey.[34]

These concerns were not limited to people who had chosen not to use open banking. Throughout the research, participants described trust as something that needed to be continually built and maintained through clear communication, transparency and appropriate safeguards. This offers another lesson for future financial data sharing:

Key lesson 2 : Trust is an outcome

As financial data sharing grows more complex, consumers are likely to encounter a wider range of organisations and systems.

Future schemes should not assume consumers will immediately trust sharing information with a range of new organisations or services. Instead, they should recognise that it is built over time by demonstrating clear benefits and making trust frameworks visible in practice.

34 Money and Mental Health survey of 234 people with lived experience of mental health problems. Base for this question: 60 people with mental health problems who stated they had not used any type of open banking enabled service. Respondents could select multiple options, so percentages do not sum to 100%.

Financial data is deeply personal

Participants repeatedly described financial information as deeply personal and highly sensitive. Many Research Community members were concerned that financial data could reveal their behaviour and personal circumstances in ways that felt particularly intrusive.

> "I'd be worried that it could be abused or that my data isn't secure as I don't fully trust the company or service viewing the data or trust those who saw it wouldn't keep logging my spending or my details and use that against […]. I feel I have more control over limiting what gets viewed if they only have a hard copy of a bank statement."
>
> *– Expert by experience*

Participants often felt that spending patterns and transaction histories could expose periods of financial difficulty, vulnerability or crisis. While they recognised this information could be used to offer support, they were equally concerned that it could later be used against them – for example when applying for credit, insurance or other financial products.

Participants emphasised that interpretation of financial data could lead to direct financial harm. They were concerned that financial data could be used to form a picture of them that influenced how financial institutions treated them, including through decisions about lending and access to financial products. This is another lesson for future financial data sharing:

Key lesson 3: Financial data can reveal far more than just information about someone's finances

As open finance develops, policymakers and industry will need to place greater emphasis on carefully navigating what can be inferred from financial data, not simply the data itself. Future frameworks should recognise the sensitivity of the insights that financial data can generate and ensure they are used transparently, responsibly and only where they deliver clear consumer benefit. This reflects wider findings from an upcoming report on transaction data analysis.

Weighing up the risk of sharing

A recurring concern was the possibility that financial information could be used beyond its original purpose. Participants distinguished between two different risks. One was criminal misuse, including fraud and scams. The other was legitimate organisations using financial data in ways consumers had not expected, such as targeted marketing, profiling or other commercial purposes. While they were concerned about both, the underlying worries were different.

New analysis of the Debt Need survey found that people with mental health problems are more than twice as likely (12%) than people without (5%) to report low confidence in protecting themselves from scams and fraud. They are also twice as likely (6% vs 3% without) to have experienced financial fraud or a scam in the previous three years.[35]

35 Money and Pensions Service, Debt Need Survey 2023, 2024, Money and Mental Health analysis.

Ultimately, willingness to share depended on whether participants felt the benefits outweighed the perceived risks. While this is true for all consumers, mental health problems can increase both the potential benefits of financial data sharing and the perceived – and actual – risks. Future financial data sharing systems should be designed so that people are not forced to accept levels of risk or discomfort they would otherwise find unacceptable in order to access the benefits of sharing.

Key lesson 4: Clear consumer benefit becomes more important as financial data sharing expands

Expanding access to more financial data does not automatically create consumer value, particularly where people perceive greater risks or have concerns about how their information may be used.

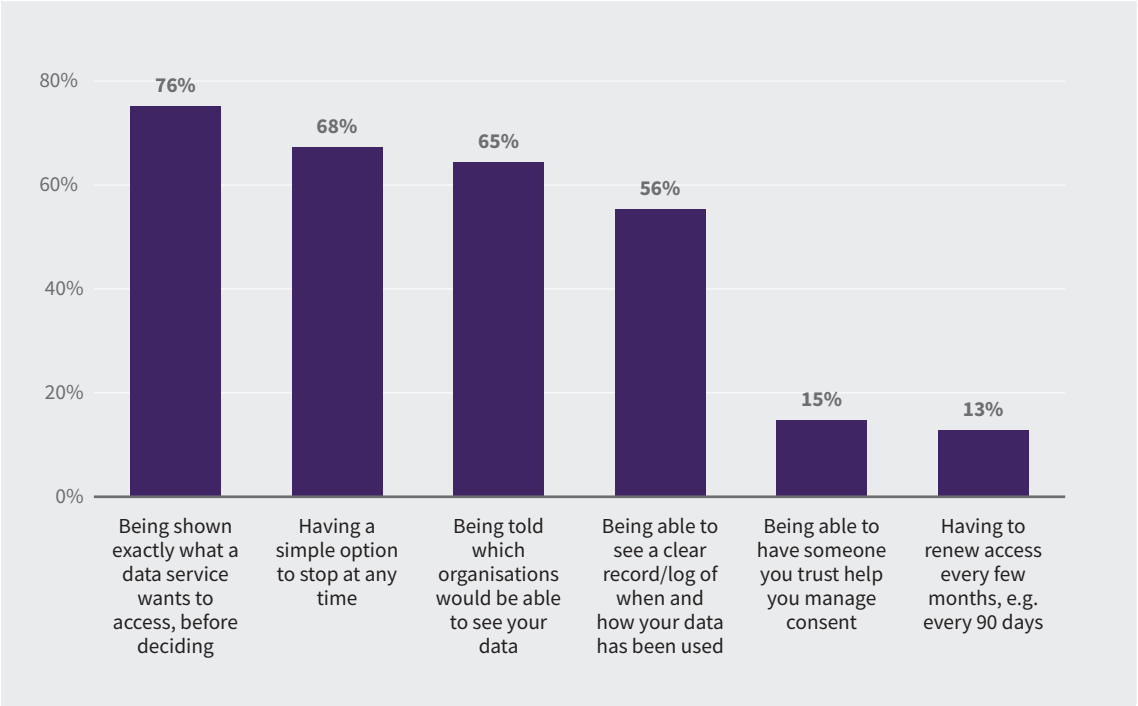
The more sensitive the information being shared, the clearer and more tangible those benefits need to be. Future open finance services should therefore be designed around solving real consumer problems, rather than assuming that more data sharing will naturally lead to better outcomes.

2.3 Consent and control are fragile

Control and visibility

Control emerged as one of the strongest themes across every stage of the research. As shown by Figure 4, when asked what would make them feel more comfortable sharing financial data, Research Community participants prioritised visible control over the permissions they gave to access their financial data. They wanted clear and practical ways to manage who could access their data, what information was shared and for how long.

Figure 4: Respondents prioritised safeguards that increased visibility and control over financial data sharing



Source: Money and Mental Health survey of 234 people with lived experience of mental health problems.[36]

As Figure 4 shows, the ability to see exactly what information was being shared was the highest-ranked option for helping them feel in control of their data. This was selected by three quarters (76%) of respondents. The next most commonly selected options were the ability to stop sharing easily (68%), being told which organisations had access to their data (65%) and having access to a clear log showing when data had been accessed (56%).[37]

Participants often described control in practical terms. For many, feeling in control meant understanding what was being shared and why, and having confidence that access could be limited or stopped when desired.

Many Research Community members also emphasised that control is not static. Mental health problems can fluctuate over time, affecting concentration, confidence and decision-making. Several participants described becoming either excessively cautious or overly trusting when unwell, while others avoided financial decisions altogether.

> "My mental health is pivotal in how I decide to manage my finances. At times I can be too trusting & other times I can be too sceptical…"
>
> *– Expert by experience*

36 Money and Mental Health survey of 234 people with lived experience of mental health problems. Base for this question: 144 people with mental health problems. Respondents could select up to three options, so percentages do not sum to 100%.

37 Ibid.

Periodic consent cycles do not always create meaningful control

Research Community participants consistently described meaningful control as permission that was specific to a particular purpose, reflecting a deliberate choice about what information was being shared, who could access it and for how long.

> "I think the permission should relate… to specific reasons why they need it and only last while the service is being used for the reason."
>
> *– Expert by experience*

In open banking,[38] one-off consent is typically used for payments and services that require only a snapshot of financial information. For most apps and services involving ongoing access, consumers are asked to renew permission every 90 days. This periodic reauthorisation was intended to give people regular opportunities to review and renew access to their financial information.

However, Research Community participants did not feel that renewing access at fixed intervals alone created meaningful control. Instead, they wanted to be able to actively manage permissions throughout the data-sharing journey, deciding what information was shared, for what purpose, for how long and being able to stop sharing easily whenever circumstances changed.

> "Blanket and open permission is dangerous, it is the source of my worry… I would not like it if permission was indefinite. The account holder should have the choice of granting it for that session only, a fixed length of time with review or choosing their own length of time to fit the circumstances at the time they grant permission."
>
> *– Expert by experience*

This helps explain why views on the current 90-day consent cycle were mixed. Fewer than half (49%) of respondents reported feeling comfortable or very comfortable renewing access every few months.[39] The findings suggest that meaningful control is not achieved simply by asking people to reauthorise access at fixed intervals in a one size fits all approach. Rather, participants wanted permissions that reflected the specific purpose for sharing and gave them greater control over how long access should last.

Granular and timely consent may be the pathway to control

When asked about consent more directly, respondents consistently favoured specific, limited permission. As Table 1 shows, around seven in ten (71%) respondents preferred to choose exactly which parts of their financial information could be accessed, rather than allowing access to all transactions.[40] The same proportion (71%) preferred to give permission separately for each organisation requesting access, rather than granting permission that covered multiple organisations.[41] More than half (55%) preferred permission to be granted on a one-time basis, allowing them to decide again each time access was requested.[42]

38 Throughout this report, "consent" refers to the permission consumers give to share financial data through the open banking framework. For ongoing access to account information, consumers are currently required to reauthorise access every 90 days.

39 Money and Mental Health survey of 234 people with lived experience of mental health problems. Base for this question: 161 people with mental health problems.

40 Ibid. Base for this question: 167 people with mental health problems.

41 Money and Mental Health survey of 234 people with lived experience of mental health problems. Base for this question: 166 people with mental health problems.

42 Money and Mental Health survey of 234 people with lived experience of mental health problems. Base for this question: 167 people with mental health problems.

Table 1: Respondents' most preferred options for managing what data is shared, who can access it and how long permission should last

Aspect of permission	Most preferred option	%
What data is shared	Choose exactly which data can be accessed	71%
Who can access data	Give permission separately for each organisation	71%
How long access lasts	One-time permission only	55%

Source: Money and Mental Health survey of 234 people with lived experience of mental health problems.[43]

Revoking permission completes meaningful control

The ability to revoke permission easily was a key part of what Research Community participants considered meaningful control. Rather than waiting for the next reauthorisation point, they wanted to be able to stop sharing as soon as they no longer wanted a service to access their information or when the original purpose had ended.

> "I would like granular control… if it's easy to cancel. Eg if I cancel a service, that should also cancel access to my data."
>
> *– Expert by experience*

These findings suggest that meaningful control extends beyond consent. Participants wanted to actively manage permissions throughout the data sharing journey, including granting, reviewing and revoking access as their circumstances changed. Given the landscape for future data sharing is set to become more complex, this provides another key lesson:

Key lesson 5: Control becomes harder as ecosystems become more complex

Future frameworks should support ongoing management of permissions, rather than relying solely on one-off decisions or periodic reauthorisation. As financial data sharing expands beyond banking into more organisations, services and use cases, people are likely to face a growing number of permissions, data flows and decisions about how their information is used.

This is particularly important for many people with mental health problems, as confidence and cognitive bandwidth can change over time. Systems that assume consumers can make a single informed decision at the outset may not reflect the realities of how people engage with financial services during periods of poor mental health.

Consumers with mental health problems want clarity about the consequences of these decisions, particularly where withdrawing permission could affect access to a service or support. As data sharing ecosystems become more complex, people should be able to review, understand and change their permissions easily over time, rather than being expected to manage an increasing number of decisions without clear support.

43 The ability to revoke permission easily was a key part of what Research Community participants considered meaningful control. Rather than waiting for the next reauthorisation point, they wanted to be able to stop sharing as soon as they no longer wanted a service to access their information or when the original purpose had ended.

2.4 Understanding what happens next matters

Throughout the research, Research Community participants frequently focused not only on the decision to share financial data, but also on what would happen afterwards, especially if there were issues. Respondents often described uncertainty about where responsibility would sit or who to contact if something went wrong. This included concerns about:

- fraud
- technical failures
- misuse of information
- situations where data had been shared with multiple organisations.

> "I think they should all report to an ombudsman specifically for open banking and data sharing in the simplified way so we don't have different regulating bodies to communicate with."
>
> *– Expert by experience*

Participants also highlighted the emotional impact of these uncertainties. Anxiety, caution and distrust frequently appeared throughout the research. Some participants described previous experiences of fraud or security incidents which had reduced their willingness to engage with financial data sharing. Others expressed concern that information could be shared more widely than expected, particularly where responsibilities between organisations appeared unclear. One participant highlighted how the names of organisations they had shared data with didn't always match what they could see in their online banking.

> "When logging into online banking, I don't always recognise the names of the companies accessing my account via open banking – they seldom correspond with the name of the app / website I signed up with. This makes me worry that access to my account risks being taken advantage of fraudulently."
>
> *Expert by experience*

For people with mental health problems, these concerns around a lack of clear routes to support are particularly significant. Participants described situations where anxiety, reduced concentration or cognitive overload made it more difficult to navigate complex systems or take action when problems occurred. As financial data sharing looks to expand, this is a lesson that needs to be considered:

Key lesson 6: Confidence depends on accountability

As financial data sharing expands across multiple organisations and sectors, maintaining that confidence will become more challenging. Consumers should not need to understand how responsibilities are divided between organisations before they can seek help or resolve a problem.

2.5 Some people can't or won't share their financial data

While many Research Community participants were open to sharing their financial data if key principles were in place, there is a group who say they either would not want to share or would find it difficult to do so.

For some, this reflected an active choice not to share their information. Others described barriers such as low digital confidence or relying on support from a trusted person during periods of poor mental health.

As the benefits of open banking and future financial data sharing expand, consumers will engage with these services in different ways. Future frameworks should recognise both those who choose not to share their data and those who face practical barriers to doing so, ensuring that participation does not become a prerequisite for accessing financial products or support.

Key lesson 7: Future financial data sharing must remain a genuine choice

If future services rely on participation in financial data sharing, there is a risk that existing inequalities will be reinforced rather than reduced. Consumers who choose not to share their financial data should still be able to access good products, fair prices and appropriate support.

Meaningful alternatives should remain available so that consumers are not disadvantaged by choosing not to share their financial data.

> "Options that are credible, helpful and effective if you do not wish to data share… A layer of calm for individuals that opt out, rather than pressure to opt in."
>
> *– Expert by experience*

Future financial data sharing systems should also be designed inclusively, minimising the risk that consumers are unable to share their data because of accessibility barriers, low digital confidence or fluctuating mental health problems.

Section 2 summary

- **Engagement does not necessarily indicate comfort**. Nearly seven in ten participants (68%) felt uncomfortable sharing their financial data despite many already using open banking-enabled services.
- **Benefits must outweigh perceived risks**. Participants were willing to share financial data where there was a clear benefit, but among those who had not used any open banking-enabled services, 70% said they would not trust these services with their information.
- **Financial data was viewed as highly personal and sensitive**, reinforcing the need for clear safeguards and limits on how data is collected, analysed and used.
- **Meaningful control mattered**. Participants prioritised transparency, purpose-specific permissions and the ability to stop sharing. Three quarters (76%) wanted to see exactly what data was shared and 68% wanted a simple way to stop sharing.
- **Accountability mattered**. Participants wanted greater clarity about responsibility, support and routes to resolution if something went wrong.



"I think they should all report to an ombudsman specifically for open banking and data sharing in the simplified way so we don't have different regulating bodies to communicate with."

– Expert by experience

Section 3: The policy landscape for future financial data sharing

3.1 A live and changeable landscape

The governance of future data sharing is being developed through several connected but distinct policy processes; through initiatives including the FCA's Open Finance Roadmap,[44] and the government's Smart Data Strategy.[45] The Future Entity[46] is being established initially as the standards-setting body for open banking, while the FCA continues to develop open finance policy but currently without a Treasury mandate. Wider Smart Data schemes are following a separate route, with the government considering sector-specific implementation entities supported by cross-economy coordination.

Although these arrangements remain under development, the choices being made now will determine whether consumer protections are built into future systems from the outset or added only after problems emerge.

This section considers how the findings from this research relate to these developments and identifies areas where there need to be additional considerations for people with mental health problems.

3.2 Key policy developments

The FCA's Open Finance Roadmap and the Department for Business, Innovation, Science and Trade's (BIST) Smart Data Strategy provide the principal policy frameworks shaping the future of financial data sharing. While they differ in scope and purpose, both seek to expand the use of consumer data to support innovation and improve outcomes. However, neither yet represents a single settled governance model. Open finance remains a developing policy programme, while the government is still consulting on how Smart Data schemes should be prioritised, designed and coordinated across sectors.[47]

As Table 2 shows, the Roadmap already recognises many of the themes identified in this research. Our findings primarily reinforce the importance of ensuring these ambitions are implemented in ways that reflect how consumers with mental health problems experience financial data sharing in practice.

44 Financial Conduct Authority, Open finance roadmap: our vision for a smart data future, 2026.

45 Department for Business and Trade, Smart Data Strategy: unlocking the power of data for consumers and businesses, 2026.

46 KPMG, Open Banking Future Entity Industry Evaluation Recommendation Report, published by the Financial Conduct Authority, 2026.

47 Department for Business, Innovation, Science and Trade, Smart Data: Multi-sector Call for Evidence, July 2026.

Table 2: The FCA's Open Finance Roadmap key policy priorities and what else needs to be considered

FCA Open Finance Roadmap	
Key priorities:	**Additional considerations this research brings into sharper focus:**
• Expanding data sharing beyond banking into wider retail financial products • Developing interoperable data frameworks and common technical standards • Open finance could support earlier identification of consumers with characteristics of vulnerability.	• The need for a greater focus on the consumer outcomes the proposed use cases deliver • The importance of joined-up data journeys not just technical standards • The need to define vulnerability and support needs without relying on assumptions • A requirement to prevent profiling and unintended harms while maintaining meaningful consumer choice.

Table 3 sets out how as Smart Data expands across sectors, our findings suggest consumer experience should continue to inform the development of future frameworks alongside technical and commercial considerations.

Table 3: BIST's Smart Data Strategy key policy priorities and what else needs to be considered

Smart Data Strategy	
Key priorities:	**Additional considerations this research brings into sharper focus:**
• Expanding Smart Data across sectors and developing the Smart Data Guidebook to establish common design principles, governance and best practice • Reducing unnecessary friction and compliance burdens while supporting consumers to make better use of their data • Building on the success of open banking as Smart Data expands • Developing a governance model that can combine sector expertise and delivery with consistent standards and consumer protections across the economy.	• Ensuring consumer protections and accountability develop alongside expansion • Balancing growth and competition with meaningful consumer value without compromising protections • Ensuring consumers are not left to navigate complex data sharing journeys or unclear responsibility across multiple organisations. • Maintaining meaningful consumer choice so people do not feel pressured to share more data than they are comfortable with. • Recognising that adoption alone is not a proxy for consumer trust.

3.3 The Future Entity

Alongside wider open finance policy, work is underway to establish a permanent Future Entity as the primary standards-setting body for open banking in the UK. The proposal was developed following recommendations from the Joint Regulatory Oversight Committee – a collection of regulators and HM Treasury – in 2024.[48] Its initial responsibilities are expected to include maintaining common Application Programming Interface (API) standards, monitoring performance and supporting certification and directory services. The FCA has also said that its role may evolve or expand into open finance in future, although that wider remit has not yet been established.[49]

This makes future compatibility an important part of its design. Building the Future Entity so it can absorb an open finance role later would reduce the risk of having to retrofit consumer protections or create a separate governance structure once expansion is underway.

The Future Entity is not expected to govern wider Smart Data schemes. Research commissioned by the Government in early 2026 instead proposed a federated model in which sector-specific implementation entities operate alongside a central Smart Data coordination function.[50]

As these arrangements are established, there is an opportunity to ensure governance frameworks are designed around consumer outcomes and informed by the lived experience of people with mental health problems and other groups in vulnerable circumstances.

3.4 An opportunity to address redress

While the above developments highlight progress in financial data sharing, there are still some gaps. One of the clearest identified through this research, particularly through discussions with industry stakeholders and experts, relates to accountability and redress. The importance of clear accountability and redress was recognised by the government during the development of the original Smart Data proposals in 2019.[51] However, as open banking has evolved, consumers are faced with a complex maze of different organisations and regulatory frameworks. Consumers are expected to identify the organisation responsible before pursuing a complaint or seeking redress, even though data may have passed through multiple organisations.

Consumers can complain to individual organisations but the current framework offers no single, consumer-facing route for resolving problems where responsibility is shared across multiple organisations. The Financial Ombudsman Service (FOS) can consider complaints about the conduct of financial services firms, but it is unclear whether complaints about the handling or sharing of financial data would fall within its remit or instead with the Information Commission (ICO).[52] While consumers can escalate to the ICO about data protection issues, it cannot award compensation or provide individual redress. Individuals seeking compensation must instead pursue a claim through the courts.[53]

48 Joint Regulatory Oversight Committee. Proposals for the design of the future entity for UK Open Banking. HM Treasury, 19 April 2024. Available at: GOV.UK.

49 Financial Conduct Authority, FS25/4: Design of the Future Entity for UK Open Banking, July 2025.

50 Department for Business, Innovation, Science and Trade Research into governance models for Smart Data, January 2026.

51 Department for Business, Energy and Industrial Strategy, Smart data: putting consumers in control of their data and enabling innovation – Government response, alongside subsequent Smart Data research on liability and governance. 2019.

52 The recent consultation from FOS on modernising redress suggests that complaints that are more appropriate to other bodies like the ICO could be rejected by FOS. (https://www.fca.org.uk/publication/consultation/cp26-9.pdf)

53 Information Commission (ICO). How to make a data protection complaint. States that the ICO "doesn't have the power to award compensation and isn't able to advise on compensation claims."

Without clear accountability and routes to redress, consumers may be left uncertain about where to turn when problems occur. This can undermine confidence in financial data sharing, particularly where information passes between multiple organisations that each hold only part of the responsibility. As open finance develops and new Smart Data schemes are established through different governance routes, there is an opportunity to address this before more complex data sharing arrangements become established.

3.5 The Data (Use and Access) Act 2025

Alongside developments specific to open finance and smart data, the Data (Use and Access) Act 2025[54] provides a wider legislative framework supporting increased data sharing across the economy. The DUAA provides the legislative mechanism through which future Smart Data schemes can be created, but the governance and detailed design of those schemes will be developed separately. Many of its provisions are intended to reduce friction in order to make data sharing simpler, faster and more consistent for organisations and consumers.

Reducing friction can help improve usability but it does come with risks. Many people with mental health problems may find it hard to weigh up decisions or navigate complex journeys. At other times, they may rush through important decisions without fully taking in the information presented.[55] Without pause points people may not have the opportunity to slow down, process information and return to a decision when they feel better able to engage. Future data sharing systems need to recognise that speed and efficiency alone do not necessarily lead to better consumer outcomes. The challenge for policymakers and industry is to balance the innovation needed to enable more data sharing with consumer control and understanding.

Table 3 shows that both excessive and insufficient friction can create poor consumer outcomes. The challenge is to remove unnecessary friction while preserving meaningful pause points that support understanding, reflection and informed decision-making.

54 Data (Use and Access) Act 2025, c.18 available at: GOV.UK – Data (Use and Access) Act 2025 (accessed July 2026).

55 Holkar M and Lees C. Convenience at a Cost: Online shopping and mental health. Money and Mental Health Policy Institute. 2020.

Figure 5: The design challenge: reducing friction while maintaining meaningful consumer control



3.6 A joined-up approach to future financial data sharing

These developments are progressing through different policy and regulatory routes. The Future Entity will initially focus on open banking, future open finance arrangements remain under development and Smart Data schemes may rely on sector-specific entities supported by central coordination. Consumers, however, will not experience these institutional boundaries. They will experience a series of requests to share data, permissions to manage and multiple organisations to approach when something goes wrong.

This makes coordination more – not less – critical. Government and regulators should establish consistent expectations on consumer protection, transparency, meaningful control and redress, with separate governance bodies working to these across the ecosystem.

The findings from this research highlight opportunities to strengthen the future development of financial data sharing. Addressing the challenges laid out in this report has the potential to improve financial data sharing for not just consumers going through a period of poor mental health or financial difficulty, but for everyone.

Section 3 summary

- **Policymakers are laying the foundations for the next phase of financial data sharing** through open finance, Smart Data and the Future Entity.
- **Our findings identify areas where consumer experience**, particularly for people with mental health problems, should play a stronger role in shaping future policy and implementation.
- **As financial data sharing expands, governance, accountability and routes to redress** should develop alongside technical and commercial frameworks.
- **Future systems should be designed to improve convenience without reducing consumers' understanding**, choice or control.



"... these systems... should [exist] for the benefit of those who use them. They therefore need to be co-designed and reviewed constantly by those people. They should have features which will alleviate stress, issues, challenges and more which could exacerbate mental health conditions..."

- Expert by experience

Section 4: Ensuring financial data sharing works for people with mental health problems

Open banking has demonstrated that financial data sharing can deliver meaningful benefits for people with mental health problems. At the same time, our research found opportunities to strengthen how future financial data sharing works and do so for more consumers, particularly by focusing on creating confidence and control while ensuring accountability.

As the governance of open finance and smart data is established through different routes, there is an opportunity to embed these improvements from the outset and ensure that separate schemes deliver a consistent consumer experience. This will require more than simply extending existing open banking arrangements.

In the recommendations below, the first set is focused on the immediate actions needed to establish strong foundations for the future financial data sharing ecosystem. The remaining recommendations look ahead to how the ecosystem should evolve as financial data sharing expands.

Immediate priorities

4.1 Establish a clear consumer protection, accountability and redress framework

Why this matters

Our research found that many people with mental health problems wanted confidence that financial data sharing operates within a clear framework of accountability. Wider evidence suggests that consumers often place greater trust in their bank or account provider than unfamiliar third-party services. As financial data sharing expands, consumers will need clear and consistent information about who they are sharing data with, what protections apply and where responsibility sits. They should not be expected to navigate complex governance arrangements or identify the correct organisation before seeking help.

We recommend that:

The government, Department for Business, Innovation, Science and Trade (BIST), the FCA and the Information Commission (ICO) should establish a clear consumer protection, accountability and redress framework for financial data sharing. **The Future Entity** and other scheme-governance bodies should implement and support that framework within their respective remits.

This requires two complementary key steps:

- Creating clear accountability and consumer confidence across the financial data sharing ecosystem
- Developing a ‘no wrong door’ approach to complaints and redress

Clear accountability and consumer confidence

- **The government** should ensure that open banking, open finance and future Smart Data schemes develop within a coherent governance framework that delivers a consistent consumer experience, even where different organisations retain responsibility for implementation.

- **The government** should provide the **FCA** with a clear statutory mandate for open finance and ensure the **Future Entity** is designed from the outset so it can evolve into the common standards-setting body for both open banking and open finance.

- **BIST** should develop a cross-regulatory consumer protection framework setting out governance, regulatory responsibilities, oversight, consumer protections, and how complaints and redress operate across financial data sharing. This should explain where responsibility sits, when complaints should be directed to organisations such as the **Financial Ombudsman Service (FOS)** or the **ICO**, and identify any areas where consumers may lack access to effective redress.

- **The FCA and ICO** should publish joint guidance explaining how protections apply as financial data moves between organisations, where responsibility sits and how consumers can seek help.

- **The FCA working with the Future Entity** should develop a consistent approach to consumer-facing trust signals across financial data sharing. These should provide clear, consistent information about whether a provider is authorised and/or regulated, what consumer protections apply, who is responsible for the use of consumers' data, and make it easy for consumers to recognise which organisation is requesting or processing their financial data. Where technical or legal entity names differ from the consumer-facing service or app, this should be explained clearly.

- **Banks, insurers, pension providers and other trusted account providers** should play an important role in helping customers understand and navigate financial data sharing. This approach should build on the trust frameworks being developed for Digital Verification Services under the Data (Use and Access) Act, while recognising that trust requires more than a recognisable badge.

- **Within open banking, the Future Entity** should develop operational and consumer-facing standards that support this framework. It should be designed so that these standards can be extended or adapted if its remit expands into open finance. This should include standards for consumer protection, trust signals, complaints and redress. It should monitor emerging harms and escalate systemic issues to regulators where appropriate.

- Existing coordination mechanisms, including the **Digital Regulation Cooperation Forum**[56] should be used to develop shared expectations on areas such as: transparency, AI-enabled analysis, secondary use of financial data and support for people in vulnerable circumstances.

56 Digital Regulation Cooperation Forum (DRCF) – a collaboration between the FCA, ICO, CMA and Ofcom to support coherent regulation across overlapping digital regulatory issues. Competition and Markets Authority, Financial Conduct Authority, the Information Commission and Ofcom, Digital Regulation Cooperation Forum: embedding coherence and cooperation in the fabric of digital regulators. 2021.

A ‘no wrong door’ approach to complaints and redress

- **Government and regulators** should establish a ‘no wrong door’ approach to complaints and redress. **The Future Entity, commercial Smart Data scheme operators and future governance bodies** should align their complaints standards, signposting and referral arrangements with this approach.

- As open finance and wider Smart Data schemes develop, **government and regulators** should monitor the nature and prevalence of consumer harms arising from financial data sharing. This could include introducing questions into existing surveys, such as the **FCA’s Financial Lives Survey**, alongside improved complaints and redress data. If evidence shows harms increasingly span multiple sectors, **regulators and schemes, the government** should consider establishing a dedicated cross-sector redress mechanism, such as a data ombudsman.

Consumers should not need to understand complex governance arrangements before seeking help. When financial data moves between different organisations, it will become even increasingly unclear who is responsible. As financial data sharing expands across multiple organisations, complaints and redress should operate in a way that is straightforward for consumers, even where responsibility sits across multiple organisations. Figure 6 illustrates how a ‘no wrong door’ approach could simplify the consumer journey while enabling organisations to determine responsibility behind the scenes.

Figure 6. A ‘no wrong door’ approach to complaints and redress



4.2 Future use cases should meet a clear consumer outcomes test before implementation

Why this matters

Our research found that people with mental health problems were more willing to share financial data where there was a clear and meaningful benefit. As open finance develops, decisions will need to be made about which areas should be prioritised first – for example mortgages, savings, pensions or insurance – and what types of services should be developed within them. These decisions should be guided by the consumer outcomes they are expected to deliver, rather than data availability or commercial opportunity alone.

We recommend that:

The FCA should establish clear consumer outcomes criteria to guide the prioritisation, design and evaluation of future open finance use cases. **BIST** should apply equivalent criteria when prioritising and designing sector-specific Smart Data schemes. **Relevant governance and implementation bodies** should then embed these criteria within scheme standards, rules and evaluation.

The development of open finance and Smart Data schemes should be informed by people with mental health problems and other groups in vulnerable circumstances, alongside consumer organisations and charities.

New open finance use cases and Smart Data schemes should demonstrate that they:

- address a clear consumer need and offer meaningful benefits;
- are designed to improve outcomes for people in vulnerable circumstances;
- minimise cognitive burden and avoid creating undue pressure to share data;
- provide meaningful alternatives for people who choose not to share their data; and
- include appropriate accountability and redress arrangements.

As open finance develops, the FCA will need to determine which areas and high-level use cases should be prioritised. The examples below illustrate the kinds of services that could emerge within those areas and deliver meaningful outcomes for people with mental health problems.

Illustrative potential open finance use cases and associated applications designed around consumer outcomes

1. **Energy sector: Easier switching and affordability support**

   Enable consumers to switch more easily to better-value financial products and services and simplify access to support such as social tariffs and affordability schemes through trusted data sharing.

2. **Credit sector: Simpler access to affordability support**

   Use trusted financial data sharing to help consumers access social tariffs, affordability schemes and other forms of financial support more easily, reducing paperwork, repeated applications and the need to repeatedly provide the same information.

3. **Banking sector: Temporary financial protections during periods of poor mental health**

   Allow consumers to put temporary financial protections in place before they are needed, helping to protect essential payments, such as rent and priority bills, and activate previously agreed support during periods of poor mental health.

4. **Insurance and pensions sector: Assisted financial administration**

   Help consumers complete routine financial tasks – such as renewing insurance, managing subscriptions or updating personal information – without repeatedly filling in forms or navigating multiple organisations, which can become difficult during periods of poor mental health.

4.3 Create meaningful control throughout the financial data sharing journey

Why this matters

Our research found that many consumers with mental health problems wanted to remain in control of their financial data after it had been shared. They wanted to understand who had access, why it was being used and to be able to review, change or stop sharing as their circumstances changed. As financial data sharing expands into multiple sectors, keeping in control of data shared could become very difficult.

We recommend

The FCA, ICO and government should establish consistent expectations for ongoing consumer control across financial data sharing. Within open banking, **the Future Entity** should translate these expectations into practical operational standards and should be designed so that those standards can extend into open finance when its remit expands. Future Smart Data governance bodies should adopt equivalent requirements to support consistency across sectors.

Compliance should be reflected in relevant scheme standards, certification and assurance arrangements.

This can be achieved by:

- establishing clear expectations for reviewing, changing and ending data sharing.
- creating interoperable consumer control points

Establishing consistent controls throughout the data sharing journey

The FCA, ICO, the Future Entity and future Smart Data governance bodies should ensure that existing data protection rights are translated into consistent, practical consumer controls. Consumers should be able to easily review, understand, manage and end financial data sharing throughout the lifetime of a data sharing arrangement, rather than relying solely on periodic reauthorisation.

The operational requirements should ensure consumers can:

- see who has access to their financial data and why
- review what information is being shared
- pause, stop or reduce data sharing
- understand the consequences of changing or ending data sharing.

Information should be presented in plain English, at the point consumers make decisions, rather than relying solely on privacy notices or legal documentation.

These requirements should be applied proportionately to the risks posed by different data sharing arrangements. The level of control and information provided should reflect the sensitivity of the data, the nature of the service and the potential impact on consumers, while ensuring that all consumers can exercise meaningful control regardless of the provider or product.

Interoperable consumer control points

Consumers should be able to manage financial data sharing through trusted interfaces, such as their banking app, a third-party dashboard or another authorised service, without needing to navigate separate systems for every organisation. Regardless of where they choose to manage permissions, they should experience a consistent view of, and control over, financial data sharing across providers and schemes.

The Future Entity should coordinate common operational standards within open banking, while allowing flexibility in how firms implement these standards. Government, regulators and future governance bodies should work towards interoperability across open finance and wider Smart Data schemes as those arrangements develop. Expectations should be proportionate and risk-based, enabling innovation while ensuring consumers experience consistent and meaningful control over their data.

Longer-term priorities

4.4 Prevent a privacy premium and protect choice in financial data sharing

Why this matters

Our research found that consumers wanted financial data sharing to remain a genuine choice. As financial data sharing becomes more common, there is a risk that people feel compelled to share their financial data in order to access products, services or support, despite having legitimate concerns about privacy, control or how their information may be used.

We believe that there is a risk of consumers experiencing a "privacy premium" – avoidable disadvantages because they choose not to share their financial data . This could include paying more, missing out on more suitable products or relevant support, or facing greater barriers to accessing essential services.

What could a privacy premium look like?

Paying more: A consumer chooses not to share their financial data with their telecoms provider. They can still access the service, but are offered a standard tariff rather than a cheaper personalised deal available to customers who share their data.

Missing out on support: A consumer is eligible for an energy social tariff, but accessing it requires them to share financial data to verify their eligibility. They are uncomfortable doing so and therefore miss out on support they would otherwise be entitled to.

While some products and services will legitimately depend on financial data sharing to deliver additional value, consumers should not experience avoidable disadvantages simply because they have chosen not to share their financial data.

Consumers may also experience similar disadvantages where they are unable to share their financial data because systems are not designed to meet their needs. Inclusive design, accessible customer journeys and appropriate support will therefore be essential to ensure that people who want to participate are able to do so and are not excluded from the benefits of financial data sharing.

We recommend

Government, regulators and industry should ensure that financial data sharing remains a genuine choice. Consumers who choose not to share their financial data should not face unfair or avoidable disadvantages simply because of that decision. They should also monitor whether the expansion of financial data sharing is creating a privacy premium or other systematic disadvantages for those who do not participate.

This should be achieved by:

- monitoring for evidence of a privacy premium
- responding where unfair or avoidable disadvantages emerge
- ensuring meaningful alternatives remain available wherever reasonably possible.

Monitoring

The FCA, BIST, Competition and Markets Authority (CMA) and, where relevant, **sector regulators** should monitor whether financial data sharing is creating systematic disadvantage for consumers who choose not to share their financial data.

Monitoring should recognise that some products and services will only be possible where financial data is shared. The purpose should not be to prevent innovation, but to identify whether consumers are experiencing unfair or avoidable disadvantages simply because they have exercised a legitimate choice not to participate.

Signs of disadvantage could include:

- poorer prices or terms that cannot reasonably be explained by differences in risk
- reduced access to products or support
- patterns of exclusion from new services or innovation
- evidence that consumers feel pressured to share financial data despite significant concerns about doing so.

Responding where unequal outcomes emerge

Where monitoring identifies evidence of a privacy premium, regulators should take proportionate action. This could include reviewing customer journeys, strengthening scheme requirements or taking regulatory or competition action where appropriate.

Ensuring meaningful alternatives

Where products, services or support can reasonably be provided without financial data sharing, firms and public bodies should ensure meaningful alternatives remain available. These should deliver comparable outcomes, be clearly signposted and include appropriate support – such as assisted digital journeys, trusted third-party assistance or non-digital channels –where needed.

This is important both for consumers who choose not to share their financial data and for those who would like to share but are unable to do so because of accessibility needs, digital exclusion or other barriers.

Where financial data sharing is fundamental to how a product or service operates, consumers should receive clear information about why data sharing is required, what additional value it enables and the implications of choosing not to participate.

4.5 Review and strengthen the Customer Experience Guidelines so they are fit for purpose

The challenge

As financial data sharing expands across products and sectors, consumers should experience the same high-quality customer journey regardless of which service they use or which type of data is shared.

The existing Customer Experience Guidelines developed by Open Banking Ltd[57] provide a strong foundation but they should now be reviewed to ensure they remain fit for the future of financial data sharing.

We recommend:

The Future Entity, FCA and industry should review the existing open banking Customer Experience Guidelines and ensure they are fit for the next phase of open banking. The revised guidelines should be designed so they can provide a foundation for future open finance arrangements, while offering lessons for customer-experience standards in other Smart Data schemes.

The review should strengthen expectations around:

- embedding lived experience throughout the design and testing of customer journeys
- designing for periods of fluctuating mental health and reduced cognitive bandwidth
- providing clear visibility of active permissions and ongoing data sharing
- transparency around AI-enabled and automated decision-making; and
- accessible alternatives for people who need additional support, such as through a trusted person.

4.6 Embed supportive design into financial data sharing journeys

Why it matters

Our research found that people do not always engage with financial data sharing from a position of confidence or stability. People's circumstances and support needs can change over time, so customer journeys should help consumers understand information, make informed decisions and retain meaningful control throughout the data sharing journey.

57 Open Banking Limited (2026), Customer Experience Guidelines (Version 4.0.1). Available at: Open Banking Customer Experience Guidelines.

We recommend:

The FCA and BIST should establish shared cross-economy expectations for supportive design. **The Future Entity** should embed these expectations within open banking customer experience and control standards, while future open finance and Smart Data governance bodies should apply equivalent expectations within their schemes. These expectations should build on the Consumer Duty's focus on achieving good outcomes, while ensuring equivalent protections apply wherever financial data sharing falls outside the Duty's scope. Within open banking, these expectations should be incorporated into the updated Customer Experience Guidelines and relevant **Future Entity** standards. Those standards should be capable of extension into open finance once the remit expands.

Supportive design expectations should distinguish between:

- **Minimum expectations** that apply across all financial data sharing journeys; and
- **Enhanced expectations** where financial data sharing could have significant consequences for consumer outcomes.

Minimum expectations

All financial data sharing journeys should:

- present information clearly and in plain English
- support informed decision-making throughout the data sharing journey, rather than relying solely on initial consent
- provide clear opportunities to review, understand and manage ongoing financial data sharing
- ensure support is available through accessible channels when consumers need additional help.

Enhanced supportive design expectations for higher-impact decisions

Enhanced supportive design should provide proportionate support where financial data sharing could have significant consequences for consumers. This could include:

- access to credit
- affordability assessments for non-credit based services such as private renting
- insurance products where financial data may affect eligibility or pricing
- debt support, for example sharing income and expenditure information with a debt adviser or setting up affordable repayment plans.

Depending on the context, enhanced supportive design could include:

- review points before significant decisions
- opportunities to pause and return later
- staged decision-making
- clear explanations of how changing or ending data sharing could affect the service provided.

Importantly, enhanced supportive design should introduce proportionate support without creating unnecessary barriers or "sludge."

4.7 Protect consumers from harmful inferences and secondary uses of financial transaction data

Why it matters

Our research found that many people viewed financial transaction data as highly personal because of what it could reveal about their lives. Concerns extended beyond the data itself to how it might be analysed, combined with other information or reused in ways consumers would not reasonably expect.

We recommend

As open finance and Smart Data develop, those overseeing governance arrangements should be regularly reminded of the potential for financial transaction data to generate highly sensitive inferences. They should establish additional safeguards where it is 'bundled' into larger packets of support or services or used in ways that could significantly affect consumer outcomes.

These safeguards should be reflected in **FCA** requirements, **ICO** guidance and the rules and standards of relevant financial data sharing schemes. Within open banking, the **Future Entity** should consider how its standards can support transparency and consistent implementation, while commercial scheme operators and regulated firms should be responsible for applying appropriate protections to specific uses.

This should include:

- Applying stronger safeguards to higher-impact uses
- Clear expectations for secondary use.

Applying stronger safeguards to higher-impact uses of financial transaction data

Relevant regulators and scheme-governance bodies should identify uses of financial transaction data that have the greatest potential to affect consumer outcomes negatively and apply proportionate additional safeguards. These safeguards should still allow firms to use data to support customers at risk of harm while minimising the risk of misuse.

These uses may include:

- profiling and behavioural inference
- AI-enabled analysis of financial behaviour
- automated or AI-assisted decision-making
- secondary use of financial transaction data, including targeted marketing
- onward sharing with third parties

Clear expectations for secondary use

Consumers should receive clear, plain English information about how their financial transaction data may be reused beyond its original purpose. This is essential when the use is not something the consumer could have reasonably expected.

For example, consumers may reasonably expect financial transaction data shared to complete an affordability assessment to be used for that assessment. They may not reasonably expect the same information to be reused for unrelated profiling, marketing or decisions about access to other products and services. Future governance arrangements should ensure these expectations are clear, transparent and consistently applied.

Conclusion

The next level of financial data sharing is now taking shape. Decisions being made today about governance, standards and consumer protections will shape how people experience financial data sharing for years to come. There is a clear opportunity to apply the lessons of open banking before more complex financial data sharing arrangements become established.

Open banking is moving towards permanent governance through the Future Entity. Open finance should develop alongside it, not as a separate or delayed system. Built on the same technical foundations, they should evolve as one coherent financial data sharing ecosystem, with consistent standards, consumer protections and routes to support. Governance should keep pace with innovation so consumers experience one joined-up system, rather than a patchwork of different approaches.

People are often willing to share financial data when the benefits outweigh the perceived costs. The next phase of financial data sharing should focus on reducing these costs not just on expanding access to more data.

If sharing financial data helps people achieve better outcomes, consumers should be able to do so with confidence. If it does not, we should question why they are being asked to share in the first place.



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