

Department for Science, Innovation & Technology
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Consultation Response

Which? response to the Department for Science, Innovation and Technology call for evidence on ‘[Smart Data opportunities in digital markets](#)’

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Summary

Which? welcomes the opportunity to respond to the Department for Science, Innovation and Technology (DSIT) [call for evidence on smart data opportunities in digital markets](#).¹

[Our research shows that](#) consumers often feel powerless to challenge or negotiate with organisations that hold their data, constrained both by limited knowledge of data practices and by their dependence on data-driven products.² These challenges are compounded by competition issues. In many digital markets, a small number of dominant platforms hold vast amounts of user data, giving them a significant competitive advantage over smaller rivals. Where competition is weak, platforms have little incentive to improve the quality of their services, including mechanisms for consumers to access or share their data. Smart data schemes in digital markets should empower consumers to navigate these complex environments more successfully.

Smart data gives consumers the ability to share their data between businesses and other organisations, to enable new uses of data in ways that benefit consumers, society, and economy. As the UK consumer champion, Which? is committed to ensuring that smart data initiatives work in consumers’ best interests. [Which? proposes a model for smart data trust frameworks](#) which is underpinned by principles of governance, protection and scalability.³ These aim to embed consumer control and trust from the start and create a trusted ecosystem for data-sharing within digital markets and also between digital markets and others.

¹ DSIT (2025), *Open call for evidence: Smart Data opportunities in digital markets*. Available at: <https://www.gov.uk/government/calls-for-evidence/smart-data-opportunities-in-digital-markets/smart-data-opportunities-in-digital-markets>

² Which? (2018), ‘Control, Alt or Delete? Consumer research on attitudes to data collection and use’. Available at: <https://www.which.co.uk/policy-and-insight/article/control-alt-or-delete-consumer-research-on-attitudes-to-data-collection-and-use-aTS7R0Z87Al2>

³ Which? (2024), ‘Building Consumer Trust in Smart Data’. Available at: <https://www.which.co.uk/policy-and-insight/article/building-consumer-trust-in-smart-data-aLpqI3q6tEdM>

If smart data initiatives are developed in an ad hoc way, consumers risk facing inconsistent protections and fragmented experiences, with a failure in one sector affecting engagement with the whole ecosystem. Without this cross-sector join-up, there is a risk digital markets will operate in isolation, which introduces risk of harm and detriment to consumers. Our trust framework seeks to address this by providing a set of minimum and consistent cross-sector requirements on participating organisations, which protect consumers from harm and foster trust and confidence.

Full response

1. What issues do customers face in accessing their data held by digital markets firms and sharing that data with third parties?

Consumers face a range of obstacles when trying to access their data from digital markets firms and share it with third parties. While these are likely to include both technical and behavioural barriers, our research speaks to the latter. [Which?'s 2018 report 'Control, Alt or Delete?'](#) highlights that the data ecosystem is largely invisible to most consumers, meaning most consumers have only a partial understanding of what information is collected about them, how it is used, and by whom.⁴ Many hold the mistaken belief that data exchanges are discrete and transactional, that they 'give' a piece of personal information solely in return for a specific product or service, without realising that their data may be shared more widely with third parties or combined to build detailed personal profiles.

This lack of transparency fosters what the report calls 'rational disengagement'. For many, the effort required to understand and control data collection far outweighs any perceived benefit, especially when there appears to be few or no alternative services available. Consumers often feel powerless to challenge or negotiate with organisations that hold their data, constrained both by limited knowledge of data practices and by their dependence on data-driven products. This sense of futility leads consumers to disengage, reinforcing a cycle where they remain unaware of the full extent of their rights or the ways in which they might exercise them.

These challenges are compounded by competition issues. In many digital markets, a small number of dominant platforms hold vast amounts of user data, giving them a significant competitive advantage over smaller rivals. Where competition is weak, platforms have little incentive to improve the quality of their services, including mechanisms for consumers to access or share their data. Monopolistic conditions can mean there is simply no viable smaller firm for consumers to transfer their data to. Slow, ineffective, or opaque processes for exercising data rights can therefore go unchallenged, and consumers may develop an inaccurate understanding of what is possible.

⁴ Which? (2018), 'Control, Alt or Delete?'. Available at: <https://www.which.co.uk/policy-and-insight/article/control-alt-or-delete-consumer-research-on-attitudes-to-data-collection-and-use-aTS7R0Z87A12>

2. What use cases do you believe could be supported through a Smart Data scheme to address those issues, including types of products and services that ATPs might be able to offer, and what outcomes could this result in?

Smart data schemes in digital markets should empower consumers to navigate these complex environments more successfully. Currently, there is an imbalance of information and power between consumers and digital firms. Therefore, a primary goal of any smart data scheme in this sector should be to equip consumers with the information and agency needed to find products and services that best meet their needs. Potential applications include facilitating easier switching between services, enabling data portability, and providing tailored comparison services.

The Competition & Markets Authority has identified how price transparency schemes, as a subset of smart data schemes, may be particularly beneficial to consumers.⁵ Since these schemes rely only on business data and do not require customer data then this avoids the behavioural barriers we outline in response to Question 1.

3. What types of data and data holders would need to be in scope of a scheme in order to support any business models and address data access issues and use cases you have identified above?

For a digital market smart data scheme to be effective, it should bring into scope the full range of data types collected and used by the most influential digital platforms. This could include social media companies, streaming services, online marketplaces, search engines and app stores. [Which?'s 2020 report 'Are you following me?'](#) highlighted various types of data collected by online platforms, and a smart data scheme for digital markets should consider utilising these data types.⁶ This includes first-party data, which is directly collected by a platform about a user while they are on the platform's owned website or app (e.g., user activity and profile information). Additionally, third-party data is gathered about a user from an organisation external to the primary platform.

While the quantity and type of data consumers access is ultimately a matter of individual preference, [Which? has highlighted](#) that a scarcity of high-quality, substantial data can lead to suboptimal products and services.⁷ These offerings may not accurately reflect consumer circumstances, as noted in response to Question 7 regarding risks to consumers.

⁵ Competition and Markets Authority (2025) Smart data and price transparency schemes. Available at <https://www.gov.uk/government/publications/smart-data-and-price-transparency-schemes-discussion-paper>

⁶ Which? (2021), 'Are you following me? Consumer attitudes to towards data collection methods for targeted advertising'. Available at: <https://www.which.co.uk/policy-and-insight/article/are-you-following-me-a1Bbn7F3C7RD>

⁷ Which? (2024), Building Consumer Trust in Smart Data. Available at: <https://www.which.co.uk/policy-and-insight/article/building-consumer-trust-in-smart-data-aLpql3g6tEdM>

- 4. What are your views on the feasibility to deliver a digital Smart Data scheme? Please consider any current or planned industry developments or changes that might affect delivery and highlight any key challenges.**

The [Competition and Markets Authority's Strategic Market Status \(SMS\)](#) investigation into Google Search in June 2025, which is considering a remedy enabling consumers to port their search history and related data to other providers, demonstrates that practical mechanisms for data mobility are already being explored⁸. There may be further interventions of this kind in digital markets as additional SMS investigations are undertaken.

However, the Digital Market Unit's (DMU) current approach to data portability focuses only on enabling consumers to port data from the largest firms within a market. In contrast, smart data schemes in digital markets cover the broader scope of data portability within the market, which could also include data portability between large companies, between small companies, and data portability both from large to small firms and vice versa. These wider forms of data flows are critical to unlocking innovation, fostering a greater variety of products and services, driving improvements in quality, and potentially lowering prices for consumers.

Furthermore, a smart data scheme that is confined to a single market risks missing much of the potential value of data flowing between or across sectors and markets. For this reason, cross-sector join-up is essential in smart data development and implementation. A scheme designed to enable secure and interoperable data flows across the economy, rather than just within narrow sectoral boundaries, will unlock greater benefits for consumers, competition, and innovation.

- 5. Do you have an initial or provisional view on the likely impacts (positive and negative) on:**

- Existing and future customers
- Data holders
- Small and micro businesses

[Combined response]

- 6. Do you have an initial or provisional view on the likely impacts (positive and negative) on:**

- Innovation in the supply or provision of goods, services and digital content whether directly affected by a scheme or otherwise
- Competition in markets for goods, services and digital content affected by the regulations or other markets
- Business investment in the UK
- Economic growth

[Combined response]

⁸ Competition and Markets Authority (2025), Strategic market status investigation into Google's general search services: Roadmap of possible measures to improve competition in search. Available at: https://assets.publishing.service.gov.uk/media/6859810eeaa6f6419fade671/Roadmap_.pdf

Over the past two and a half years our [Consumer Insight Tracker](#) (a monthly poll weighted to be demographically representative of the national population⁹) has consistently shown that [the majority of consumers](#) (between 60-65%) are worried about how data about them is collected and used by businesses¹⁰, and also about the security of the data they share (67%-71%).¹¹

Well-designed smart data schemes could deliver positive impacts for consumers, data holders and the wider economy, provided they are implemented effectively and with strong consumer safeguards. For consumers, [Which? has found](#) that smart data schemes could have a positive effect on many important markets¹². Providing consumers with easier access to their data and the ability to share it with third parties could significantly reduce the costs of making informed decisions, and in this way improve competition and innovation.

There is also great potential for smart data schemes to deliver benefits across many sectors of the economy. Greater productivity and competition benefits enabled by personal data mobility was estimated in 2018 to [increase UK GDP by £27.8bn](#).¹³ [Which?'s 2024 paper 'Consumer Policy for Economic Growth'](#) noted that by improving access to high-quality data and enabling secure data sharing, such schemes can stimulate innovation, open up new market opportunities, and improve competitiveness across sectors.¹⁴ The experience of Open Banking shows how measures initially designed for a narrow purpose, such as bank switching, can unlock much broader value, enabling fintech firms to develop entirely new products and services, attract significant private investment and create thousands of skilled jobs.

[Which? also found](#) that for small and micro businesses, greater data mobility can level the playing field, allowing them to compete alongside larger incumbents, enter new markets, and collaborate across sectors. Streamlined data access can also improve operational efficiency, reducing administrative burdens and freeing resources for growth.¹⁵ The public sector stands to benefit too, with data sharing already helping to make services such as tax collection faster, more accurate, and more cost-effective.

⁹ Which? (2024). *About the Consumer Insight tracker*. Available at:

<https://www.which.co.uk/policy-and-insight/article/about-the-consumer-insight-tracker-asxTG8k9XrQW>

¹⁰ The survey question is: "How worried are you, if at all, about how data about you is collected and used by businesses? Very worried, Fairly worried, Not very worried, Not at all worried, Not applicable, Don't know." The proportion of consumers worried is calculated by adding the proportion of respondents that are Very worried or Fairly worried. Which? (2024), *Consumer worries dashboard*. Available at:

<https://www.which.co.uk/policy-and-insight/article/consumer-worries-dashboard-akJMn5c4FKMv>

¹¹ As above; the survey question is "How worried are you, if at all, about the security of the data you share?" Which? (2024), *Consumer worries dashboard*. Available at:

<https://www.which.co.uk/policy-and-insight/article/consumer-worries-dashboard-akJMn5c4FKMv>

¹² Ibid

¹³ DCMS, Ctrl-Shift (2018), 'Data Mobility' Available at:

https://assets.publishing.service.gov.uk/media/5be5b8dbe5274a0829c9fb96/Data_Mobility_report.pdf

¹⁴ Which? (2024), 'Consumer Policy for Economic Growth'. Available at:

<https://www.which.co.uk/policy-and-insight/article/consumer-policy-for-economic-growth-atjpZ9s9kQb6>

¹⁵ Which? (2024), 'Consumer Policy for Economic Growth'. Available at:

<https://www.which.co.uk/policy-and-insight/article/consumer-policy-for-economic-growth-atjpZ9s9kQb6>

7. What challenges and risks should we consider when developing a digital markets smart data scheme and how can we mitigate these? This might include (but is not limited to): competition; customer exclusion; data quality or data misuse; ethical, operational or technical readiness.

During the course of our stakeholder engagement for [Which?'s 2024 'Building Consumer Trust in Smart Data' paper, stakeholders](#) across industry sectors warned us that if smart data is developed without some central oversight, there is a risk that schemes will be designed without taking into account the potential for consumer harm.¹⁶ Given that digital markets operate horizontally across the economy, not just vertically, it is critical that smart data schemes within these markets are coordinated across different sectors.

Smart data schemes, particularly those that support products or services that involve making significant decisions about consumers, must consider the wider consumer position and the potential unintended consequences for consumers. There is often an imbalance of power and knowledge between consumers and businesses. Smart data may be able to help mitigate this in some circumstances, but we've also seen examples where smart data services have exacerbated this power imbalance. This is particularly prevalent when offering an essential service or one which targets consumers in vulnerable circumstances.

The risks identified include, but are not limited to:

Poor quality products and services - Consumers are at risk of being offered subpar smart data products or services that do not accurately reflect their circumstances, thereby increasing the probability of reduced choices that are mismatched to their needs. This harm is compounded when consumers are recommended unsuitable financial products, such as insurance or mortgage products which can have a significant and long-lasting effect on their financial well-being. Our engagement concluded that the absence of personalised products can be due to the limited availability of consumer data. In addition to inaccurate product or service recommendations, consumers could be treated differently by service providers depending on the cost or technical ease in accessing their data. In a start-up environment this is often an acceptable risk and scheme providers may consider a minimum viable product (MVP) to test consumer appetite.

Lack of meaningful consent - Consumers may not understand what they are consenting to in a smart data scheme and/or may suffer losses of privacy that they are not comfortable with. A case study provided to us outlined circumstances in which the consumer did not have the opportunity to provide meaningful consent over the control of their personal data. A consumer in receipt of means-tested benefits and facing mounting debt with their energy supplier requested a repayment plan to avoid their energy supply being cut off again.¹⁷ The supplier advised that they could only do this by accessing the consumer's bank account,

¹⁶ Which? (2024), Building Consumer Trust in Smart Data. Available at: <https://www.which.co.uk/policy-and-insight/article/building-consumer-trust-in-smart-data-aLpql3q6tEdM>

¹⁷ Case study was provided to Which? by an external stakeholder, we were not informed of the energy supplier's name or details.

using Open Banking, to assess how much the consumer could afford to repay. The consumer, who was facing financial insecurity and feared losing their energy supply, did not want to consent and did not trust the provider with their data, but felt they had no choice but to comply with the provider. The supplier defended its use of Open Banking in recovering debt, claiming its use as a tailored approach which would result in less stress and a better financial position for the consumer. They were confident in the advantages it offered their customers and the supplier has held firm to their Open Banking policy.

Risk to consumer safety - Consumers may be at increased risk of loss of privacy and fraud if third parties are poor stewards of their data. Firms which meet sector regulatory requirements are still vulnerable to data breaches or cyber attacks. The greater the number of firms involved in handling consumer data, the more weak points will emerge where data privacy and data security harms can occur. A data breach can result in the consumer being exposed to fraudulent actors, resulting in psychological impact and the consumer having to spend a considerable amount of time changing their passwords or attempting to recoup their financial losses. These types of cyber attack also risk damaging the reputation of smart data schemes, which may result in a reduction of consumer trust and confidence in sharing their data for smart data schemes. In addition, there is a high risk for consumers wishing to benefit from smart data innovations, as they may become accustomed to handing over highly personal and sensitive information such as log in details. This could provide a fertile environment for fraudsters to build malicious apps to trick consumers.

Exploitation of vulnerable users - Smart data schemes run the risk of further exploiting vulnerable consumers, for instance those facing debt. This was seen in the case of [SafetyNet Credit](#) (SNC) who offered customers high-cost rolling credit. SNC used Open Banking to check how much was in the consumer's bank account and chose a repayment amount using this information.¹⁸ SNC often took much more than the minimum payment set. It said this was to minimise the interest someone paid. This left the borrower with so little money that they had to borrow again from SNC, falling into a payday loan trap. In late 2022, the Financial Conduct Authority (FCA) imposed restrictions requiring SNC to evaluate a customer's creditworthiness. This assessment included the assumption that the complete capital balance, including interest, would be collected without the customer needing to borrow additional funds to make repayments. The company went into administration in January 2023 and in March 2024, payments for remaining loan balances were written off.

8. What are the potential implementation costs to industry of introducing a digital markets Smart Data scheme? What aspects of a scheme might be most expensive to implement?

N/A

¹⁸ Debt Camel (Jan 2023), 'SafetyNet Credit goes into administration'. Available at: <https://debtcamel.co.uk/safetynet-credit-administration/>

9. How can we build and maintain customer trust in a digital markets Smart Data scheme? For example, what responsibilities need to be considered for data owners and ATPs?

For a digital markets smart data scheme to succeed, consumer trust and confidence are essential. Without trust, consumers are unlikely to engage with or adopt smart data products and services, limiting the potential benefits such schemes can offer. The use of a trust framework can protect consumers from harm and foster trust and confidence by providing a set of minimum and consistent cross-sector requirements on participating organisations.

[Which? has proposed a trust framework](#) underpinned by a set of principles which smart data schemes should include, our response to Question 10 outlines these in further detail. A critical component of trust is ensuring that consumers have clear and meaningful control over their data. Best practices for consumer consent, which has been widely supported by stakeholders, should be embedded in the design of the scheme. Transparency is key - consumers must fully understand what they are consenting to, why their data is being used and for how long. The duration of consent must be clearly communicated and consumers should have an accessible and straightforward way to revoke their consent at any time. Additionally, the entire consent process must be user-friendly, ensuring that consumers can easily give, modify, or withdraw their permission. The ability for consumer consent to be interoperable - allowing for seamless interaction across different use cases and ideally, across sectors - further enhances trust by providing consistency. Importantly, all communications related to consent should be presented in plain, clear language that is easy to understand. By adhering to these standards and ensuring they are universally adopted by service providers, the scheme can create clarity and consistency, strengthening consumer confidence and encouraging greater uptake.¹⁹

Ultimately, building and maintaining consumer trust in a digital markets smart data scheme requires a proactive and consumer-centric approach. [Which? has called on](#) organisations and businesses participating in smart data schemes, the scheme providers and the Government to adopt the principles we outline below, and participating organisations should use these principles to strengthen their approaches to protection (data management and cybersecurity), and accessibility.

10. What common principles are needed to support the development of a digital markets smart data scheme and why?

As mentioned above, [Which?](#) has put forward a model for smart data trust frameworks, and this includes three common principles: **governance, protection and scalability**. These principles aim to collectively build consumer trust and confidence, thereby increasing the adoption and use of smart data products and services. Applying consistent principles across all sectors also reduces the risk of failure in one sector damaging overall consumer trust and

¹⁹ Which? (2024), Building Consumer Trust in Smart Data. Available at: <https://www.which.co.uk/policy-and-insight/article/building-consumer-trust-in-smart-data-aLpql3g6tEdM>

engagement with smart data. For these reasons, sector-agnostic principles are crucial.

Governance is fundamental to maintaining consumer trust throughout the lifecycle of a smart data scheme. Strong governance structures not only safeguard the system but also create incentives for all participating organisations to actively identify, assess, and manage risks to consumers. A key aspect of governance is the clear definition of roles and responsibilities. With multiple stakeholders involved, including data holders and authorised third parties, absolute clarity on consumer protection obligations is essential. Accountability and liability are also critical. While accountability ensures organisations are answerable for their actions, legal certainty around liability is needed to guarantee that consumer harm is addressed consistently and fairly. Effective monitoring strengthens governance further. Ongoing, technology-enabled assessment of consumer journeys, outcomes, and data flows allows risks to be detected and resolved quickly. Finally, robust mechanisms for redress are vital. Fair and reliable dispute resolution processes help to maintain consumer confidence and trust in smart data markets.

The principle of **protection** focuses on safeguarding consumer data from misuse and cyberattacks. It ensures that consumers have a clear understanding from the outset of what data is being shared, processed, and retained. Rigorous cybersecurity measures are vital to reducing the risks of data breaches and fraud. By embedding strong technical standards that enable systems to interact securely, smart data schemes can better uphold consumer protection. Central to this is data management. How businesses process and handle consumer data should be transparent and open to scrutiny, giving consumers confidence in how their information is used. Equally important is cybersecurity. Robust safeguards must be in place to protect the integrity of consumer data and maintain resilience against threats. Together, these measures ensure consumers retain control over their secure access and use of their data, building greater confidence and trust in smart data schemes.

Scalability is another important factor in fostering trust and broadening participation in smart data schemes. Ensuring that the technical infrastructure allows for interoperability across different platforms and sectors will enhance the scheme's functionality and accessibility. Expanding access to further data points can also increase inclusion, helping to unlock a wider range of innovative smart data products and services. Incorporating inclusive-by-design measures, such as common language and accessibility standards, will help ensure that all consumers - including vulnerable individuals - can participate and benefit. A scalable and inclusive scheme encourages the engagement of more consumers and service providers, leading to greater innovation and improved consumer outcomes.

11. Are there any tensions, overlaps, gaps or other features of the regulatory landscape in digital markets that the government should take into consideration?

In the light of our responses to other questions in this call for evidence, we are particularly concerned to ensure that the supplementary matters mentioned in Section 3 of the Data (Use and Access) Act 2025 that would give sufficient protections and safeguards for

consumer smart data are robustly implemented²⁰. This includes matters such as the conditions under which organisations can receive data, how consumers must be given information about rights to complain about misuse of their data and how disputes regarding consumer data must be dealt with. We would appreciate an early discussion about any suggested drafting of such provisions, and urge that there is full consultation on them.

12. What data sharing initiatives already exist in digital markets that the government should be aware of when evaluating a Smart Data scheme in digital markets?

N/A

13. What lessons should we bear in mind from Open Banking that would be helpful to consider when developing a digital markets Smart Data scheme?

The development of Open Banking provides valuable insights that should be considered when designing a digital markets data scheme. The first lesson is the value of a dedicated entity. Open Banking Limited was tasked with establishing industry standards and guidelines to drive innovation. This helped create a trusted framework developed in collaboration with the broader ecosystem. However, a critical limitation of this was the lack of meaningful consumer representation in governance structures. While there were some consumer representatives, they had limited influence over decision-making. This resulted in a governance model that prioritised technical and commercial considerations over consumer needs, leading to gaps in protections, particularly for vulnerable users. For a digital markets smart data scheme, consumer representation must be embedded in governance arrangements. A focus on vulnerable consumers will be particularly important to prevent exclusion or exploitation.

The second lesson is the need for a robust dispute management system. Since 2018, there have been attempts to develop a dispute management system and a [Code of Best Practice](#), but no single, effective process has been adopted.²¹ The [Joint Regulatory Oversight Committee](#) has recommended a gap analysis of current dispute processes and stressed the importance of applying existing liabilities through a common resolution framework.²² We would encourage future schemes to learn from the Open Banking example, noting that it is important to consider redress mechanisms, including the need for a dispute management system, as early as possible in the development of smart data schemes.

²⁰ Data (Use and Access) Act (2025); Part 1, Section 3. Available at: <https://www.legislation.gov.uk/ukpga/2025/18/section/3>

²¹ Open Banking (July 2018), 'Dispute Management System (DMS)'. Available at: <https://www.openbanking.org.uk/wp-content/uploads/Dispute-Management-System-Code-of-Best-Practice.pdf>

²² Joint Regulatory Oversight Committee (April 2023) 'Recommendations for the next phase of open banking' Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1150988/JROC_report_recommendations_and_actions_paper_April_2023.pdf p.36

The final lesson is the need to monitor consumer outcomes. While Open Banking has accelerated in recent years, [with recent figures revealing over 11.7 million active users of open banking-enabled products, and over 22.1 million open banking payments made monthly](#), there has been no comprehensive assessment of its impact on consumer outcomes.²³ While usage statistics demonstrate adoption, there has been limited evaluation of key issues such as its impact on financial inclusion, lack of payment purchase protections, risks of onward data sharing and potential ethical concerns regarding how Open Banking functionalities are used by lenders. For a digital markets smart data scheme, it is crucial to define clear success metrics from the outset. These should go beyond adoption figures and focus on tangible consumer benefits. An assessment of outcomes should also include identifying whether distinct groups of customers, such as those with characteristics of vulnerability or those with protected characteristics, are receiving worse outcomes.

14. What lessons should the government bear in mind from the EU DMA and other Smart Data schemes in other jurisdictions including the establishment of Open Banking schemes around the world?

N/A

15. Do you have any additional comments on any aspect of developing a digital markets Smart Data scheme that has not been covered elsewhere in this call for evidence?

N/A

About Which?

Which? is the UK's consumer champion, here to make life simpler, fairer and safer for everyone. Our research gets to the heart of consumer issues, our advice is impartial, and our rigorous product tests lead to expert recommendations. We're the independent consumer voice that works with politicians and lawmakers, investigates, holds businesses to account and makes change happen. As an organisation we're not for profit and all for making consumers more powerful.

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²³ Open Banking, OBL celebrates seventh anniversary of PSD2 and the creation of Open Banking (2025). Available at: <https://www.openbanking.org.uk/news/obl-celebrates-seventh-anniversary-of-psd2-and-the-creation-of-open-banking/>