

Adviser update

October 2026

Welcome to the October Adviser Update.

Our flagship adviser event in London

I would like to encourage all readers to sign up to our flagship adviser event in London on Wednesday 21 October. We are encouraging all advisers, paraplanners and administrators from across the UK to join us. I will present the new Transact strategy to make financial planning easier and enable agentic AI processes for advice firms. There will also be guest speakers including Louise Cooper and Philip Calvert. But most importantly, there will be time for advisers to network and to share best practice related to technical financial planning and technology adoption. Ultimately advisers learn more from their peers than platforms broadcasting to advisers! You can [enrol at our events through the link below](#).

Raising our game on personal service

Through one lens, I am delighted with our service levels. Turnaround times are good, front-line staff are more experienced than at any time since I joined Transact and increasing the level of proactive engagement with advisers remains an area of focus for us. However, through another lens, it is clear we can do better. As regulation evolves and risks change, we have had to strengthen some of our controls and requirements. While these changes are important, we recognise that they can cause frustration. We need to continue evolving how we apply these requirements and how we communicate them to you, whilst remaining open to making sensible improvements where we can. This is a priority for us to get right and make Transact easy to do business with.

Making it easier to recommend Transact

We are pleased to confirm that the Transact platform has achieved an AKG rating of “**A (Superior)**” for Overall Financial Strength. The “**A (Superior)**” rating is the highest rating that has been issued in the platform sector. Our rating will now appear via Defaqto making it easier for

Topics covered in this month's adviser update:

2. [TOL – enhancements](#)
3. [Integration update to Account Opening, Contributions & Withdrawals and Valuation](#)
4. [Platform comparison tools and cash interest charges](#)
5. [ISA Reform: reviewing cash and cash-like holdings](#)
6. [Protecting your business and clients from cyber threat](#)
7. [Transact-BlackRock MPS update](#)
8. [Budget speculation – more changes to capital gains tax?](#)
9. [The pre-Budget pension panic – act in haste, repent at leisure](#)
10. [Interest on cash](#)
11. [Transact Events 2026](#)

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The guidance must not be reproduced in client materials or provided to advisers' clients. Unless stated otherwise, any opinions expressed are our own or based on our interpretation of relevant rules and regulation, which is subject to change. Referenced tax treatments depend on individual client circumstances and may change in the future. All referenced accounts are fictitious and do not include any client details.

advisers to select Transact. We are also engaging with all comparison tool providers on how they incorporate cash interest and we are excited to share positive progress in the below [comparison tool update](#).

Regulatory change: ISA reforms and Budget speculation

You can be confident that Transact will deliver and support you on the pension and ISA changes due next year. We have an adviser support campaign in place over the coming months, starting in this edition we have included an article on the proactive steps you can take to manage the impact of the ISA reforms. We have reports to help you identify high cash holdings and take actions. Some actions related to investment strategy changes can be quick to implement but others including new Cash ISA applications can take longer. Please act well in advance of the April 2027 deadlines. We have also written an article to help you stay ahead of the [Budget and speculation related to CGT changes](#).

Further integration with Intelliflo to support advisers

Over the coming years we will launch new APIs and transform the level of integration between Transact and other adviser systems. I am delighted to announce this month that we have upgraded our Contributions & Withdrawals App on Intelliflo (IO). This includes a new feature 'Transact C&W Sync' which goes beyond identifying differences and allows you to push contributions and withdrawals data into IO. We have piloted this new feature with advisers with excellent feedback. We have also developed material to help advisers with the IO – [Transact account opening journey](#). Please reach out to us if you are an IO user looking for further efficiencies with Transact.

Share your views in the latest Platform Adviser Survey

If you have time, please complete [the quarterly Platform Adviser Survey](#) to give your views on the effectiveness of the platforms you use and you can enter a prize draw to win one of four £100 amazon or John Lewis vouchers.

Kind regards,

Tom Dunbar

Chief Executive Officer

2. Transact Online (TOL) – recent enhancements

Transact Online continues to evolve, and this month we have made the following updates:

- **Offshore Chargeable Event Certificates** are now available through the Pick-Up Page, making them easier to find alongside other Transact documents.
- **Enhanced Performance Analysis** now includes Annual Allowance Charges and HMRC refunds, providing a more complete picture of portfolio performance.
- **Improved Rebalance Reporting** now clearly identifies wrappers containing Limited Liquidity Assets (LLAs) and highlights any resulting impact on template allocations.



3. Integration update: Account Opening, Contributions & Withdrawals and Valuation

Making it easier for you to do business remains a key priority for us. Recent enhancements include a new account opening video and updates to the contributions and withdrawals API, helping you to manage more client activity without leaving your back-office or planning software.

[Account Opening Integration: Why you should use it](#)

If you're using **intelliflo**, **moneyinfo**, **Plannr**, **Curo** or **Zerokey**, you could be opening new Transact portfolios starting from your adviser system.

The integration helps reduce rekeying, saves time, cuts down on errors, and makes the account opening process smoother.

[Watch our short video](#) to see how it works and why so many firms are making it part of their workflow. **It's only 68 seconds long, but it could save you many hours over the course of a year.**

Getting started is simple. Contact your adviser software provider to enable the integration and start benefiting from a faster, more efficient account opening process.

How to keep your intelliflo (IO) contribution and withdrawal records up to date, faster

Good news for IO users, the new **Transact C&W Sync** app, developed in conjunction with Sprint Enterprise, makes it easier than ever to keep contributions and withdrawals information aligned between Transact and IO. The app will be instore live for all users this month. To get you started there's an IO introductory webinar to help you follow best practice.

What's new in this version?

The original app helped identify differences between Transact and IO. Phase two goes a step further by allowing you to review and push contributions and withdrawals data directly into IO, helping to ensure your records in IO are 100% accurate, reduce manual data entry as well as any more reconciliation work.

Importantly, you remain in control at all times. Nothing is updated without your say so. You decide which records to push into IO, which records to ignore and when changes should be made. Transact remains your source of truth, but the choice of what is updated in IO sits firmly with you.

Getting started is simple

1. Install the new **Transact C&W Sync** app from the IO Store. You can uninstall the old, original **Transact C&W Review** app.
2. Authorise using your **Transact Super User** credentials.
3. In IO, open a client plan, review any unmatched records and choose which items you would like to sync.

Note for multiple Transact adviser firms under the same IO Tenant

If you are an IO user with more than one Transact adviser firm under the same IO tenant, please follow the install instructions for one of the adviser firms and then contact tol@integrafin.co.uk so we can arrange for the others to be added under that tenant.

Benefits at a glance

- Reduce manual rekeying of contribution and withdrawal data.
- Improve the quality of client data held in IO.
- Save time when preparing for reviews and cashflow planning.
- Identify and resolve discrepancies quickly.
- Stay in control of every change made to your records.

Resources

- [User guide](#) and [Demo video](#)

Transact valuations via your CRM

If you currently receive Transact valuations through your CRM, there will be a small change coming over the next few months.

As part of our move to the new Transact API, you will be asked to authorise your CRM's valuation service using a Transact **Super User** account. This helps provide a more secure and modern way for trusted applications to access Transact data on your behalf.

Each CRM provider will move to the new service on its own timetable, so there's nothing you need to do at this stage. Your CRM provider will contact you when action is required, and we'll keep you updated too.

For now, no action is needed.

4. Platform comparison tools and incorporating cash interest into charging

While industry adoption remains at different stages, the direction of travel is clear.

More comparison providers now recognise that cash interest can have a meaningful impact on platform value and that advisers benefit from tools that reflect the real-world cost of investing. Here's the status as we understand it.

Defaqto

Defaqto does not currently incorporate cash interest holdings when assessing platform charges, as its system is primarily designed to compare functionality rather than cost. However, you can apply a functionality filter that distinguishes between platforms that retain cash interest and those that do not. Defaqto has reviewed the accuracy of this data and removed a number of providers that were incorrectly categorised. As a result, the number of platforms meeting the filter criteria has reduced significantly.

Filters for: Cash Interest Retained

☒ Predefined filters

DNA Score	Description
5	Cash interest is not detained
1	Cash interest is detained

Product List Preview

Included (5)

Excluded (46)

Fusion Wealth	Fusion Wealth Platform
PI Investment Services	PI Platform
Timeline	Timeline Platform
Transact	Transact
Wealthtime Classic	Wealthtime Classic Platform

As a further differentiator, our AKG rating is now displayed within Defaqto applying both the cash interest and AKG rating filters highlights the strength of our overall proposition.

Filters for: AKG Platform Financial Strength

☒ Predefined filters	
DNA Score	Description
5	A ranking is equivalent to excellent
4	B+ ranking is equivalent to very good
3	B ranking is equivalent to good
2	B- ranking is equivalent to satisfactory
1	C ranking is equivalent to weak
Description	
Financial Strength rated above average by AKG	
Financial Strength Rated average or better by AKG	
Financial Strength rated superior by AKG	

Product List Preview

Included (1)	Excluded (50)
Transact	Transact

SelectaPension

In our view, SelectaPension has made the most significant progress to date in trying to capture the true cost of retained cash interest. Initially, the system introduced functionality allowing you to apply a rebate percentage. This can be used to reflect cash offsets, negotiated terms and other pricing arrangements that are not hard coded into the system. The next phase of development is even more significant. SelectaPension is exploring a solution that would automatically incorporate cash interest offsets across the platform market, adjusting effective platform charges where a proportion of assets is held in cash. The key challenge remains sourcing accurate and consistently updated [data across providers](#). SelectaPension is also considering the introduction of a filtering option similar to Defaqto's, allowing advisers to differentiate between providers that retain cash interest and those that do not.

Fintegrate

Fintegrate is developing a similar approach to SelectaPension's planned enhancement. Its proposal is to maintain regularly updated platform cash interest data and use this information to automatically calculate the impact of retained interest on overall platform costs. This would allow headline charges to be adjusted and presented on a more representative basis.

CLIENT HOLDINGS BY PRODUCT TYPE					
☒ Stocks & Shares ISA ☐ Junior ISA ☒ General Investment Account ☒ Pension (Accumulation) ☐ Pension (Decumulation) ☐ Junior SIPP ☐ Onshore Bond ☐ Offshore Bond					
Stocks & Shares ISA		General Investment Account		Pension (Accumulation)	
Fund value	Of which cash	Fund value	Of which cash	Fund value	Of which cash
£60,000	£2,000	£100,000	£5,000	£40,000	£2,000
Overall	TI	Stocks & Shares ISA	TI	General Investment Account	TI
Platform A	0.17% £339.00 after £261.00 interest	0.30% £180.00	0.30% £300.00	0.30% £120.00	2.90% + £261.00
Platform B	0.10% £198.50 after £279.00 interest	0.25% £145.00	0.25% £237.50	0.25% £95.00	3.10% + £279.00
4 platforms hidden outside your preferred platform list.					
Overall shows the aggregate charge with assets linked across wrappers; a platform is suitable only where it supports every product type held. Wrapper columns show each provider's charge for that wrapper held on its own, so tiered structures may show a higher standalone rate than the aggregated Overall figure. Tap the information icon on any					

O&M

O&M is taking a proposal to its governance committee to consider incorporating cash holdings and cash interest into its Profiler calculations. If approved, O&M would explore an approach similar to that being developed by other comparison providers.

Other providers

At present, Analyser (Lang Cat) and Adviser Asset (FE/Nexus) do not incorporate cash interest holdings into their platform cost calculations. Both tools continue to compare platforms using headline charging structures only.

Summary of research provider development

	Position today	Cash in charge comparison	Cash retained filter	Manual cash offset	Hard-coded scenarios	Automatic offsets	Next stated development
Defaqto	Functionality-led comparison	—	✓	—	—	—	Internal teams considering further changes
Selecta Pension	Most developed current solution	✓	○	✓	✓	○	Automated offsets and retained/not-retained filter
Fintegrate	Planned solution; build not confirmed	—	—	—	—	○	Monthly provider rates and adjusted headline charges
O&M	Awaiting governance consideration	—	—	—	—	—	Governance approval to update Profiler calculations
Analyser (LangCat)	Headline gross rates only	—	—	—	—	—	Internal discussion on whether to make changes
Adviser Asset FE/Nexus	Headline gross rates only	—	—	—	—	—	Internal discussion on whether to make changes

✓ Live ○ Planned — Not started

Note: Research was conducted in October 2026 and reflects our assessment of provider functionality and stated development plans at that time.

A positive direction of travel

We will continue working closely with comparison providers to encourage greater transparency and will keep you updated as further developments are announced. If you would like to learn more, please contact your regional [Adviser Support Manager \(ASM\)](#).

5. ISA reform: reviewing cash and cash-like holdings

Proposed ISA reforms from April 2027 remain subject to final legislation and HMRC guidance. While details are still being finalised, you may find it helpful to identify clients who currently hold significant cash or cash-like assets within Stocks & Shares ISAs and consider whether their existing arrangements remain aligned with their objectives.

Cash can play a valuable role within an investment portfolio by providing liquidity, supporting short-term spending needs and offering a temporary home for funds awaiting investment. However, it can be helpful to review larger cash holdings periodically, as inflation may reduce their purchasing power and clients could miss opportunities for longer-term investment growth.

Areas that may warrant attention include:

- Clients holding significant cash balances or cash-like investments within Stocks & Shares ISAs.
- Term deposits and other cash products approaching maturity.
- Portfolios where regular withdrawals, recent subscriptions or rebalancing activity can result in higher cash balances over time.
- Clients who may benefit from using both a Stocks & Shares ISA and a Cash ISA, where appropriate to their circumstances.
- Ensuring sufficient cash remains available in both wrappers to cover any charges or potential auto-sell requirements. Alternatively, consider using fee payment wrappers.
- Reviewing your clients cash report which is available from your Transact login home page and through the Reports tab, enabling you to review cash holdings across all wrappers, including ISAs, pensions, bonds and General Investment Accounts.

For clients wishing to retain higher levels of cash, Transact supports transfers between Stocks & Shares ISAs and Cash ISAs held by the same investor. Assets, including term deposits, can be transferred between ISA wrappers without affecting the deposit term, interest rate or maturity date. Use Guided Apps (via Housekeeping > Open Wrapper) to produce the forms for this process. The Guided Application process will produce a T004. However, where a term deposit is to be moved, then this must be instructed manually (i.e. with a covering letter). Please contact your regional team for guidance on moving the term deposit. Remember transfers do not fall within ISA contribution limits.

To support you in monitoring cash levels, we have recently reviewed the cash rebalance threshold and next month we are introducing an optional flexible threshold down to 0.5%, helping you manage portfolios where cash balances may increase through client activity, withdrawals, asset sales or portfolio rebalancing.

Quick ISA transfer reminders

Where transfers are required between Transact ISA wrappers:

- Transfers can be made in cash or in specie. Only cash and term deposits can be transferred into a Cash ISA.
- Transfers may be full or partial, although current-year ISA subscriptions must be transferred in full.
- Ensure the receiving wrapper is open before submitting instructions.
- Consider any pending trades, charges or maturing term deposits before requesting a transfer.

Clear and complete instructions will help avoid delays.

Prepare and submit the required documentation via Guided Apps

Complete an illustration and obtain client authority on the following documents:

- T004[D] ISA Transfer Authority
- T001[D] Portfolio Application Form
- Upload documents via Transact Online via **Tools> Upload Documents**

If you require any assistance, please contact Sales & Online Support on 020 7608 5387 or speak to your [Adviser Support Manager \(ASM\)](#).

6. Protecting your business and clients from cyber threat

Cyber threats continue to evolve at pace, and financial services remains an attractive target for cyber criminals due to the sensitive information and financial assets entrusted to the sector.

Over recent months, we have observed an increase in cyber security incidents affecting financial adviser firms. While the methods used vary, many attacks continue to exploit familiar weaknesses, including phishing, social engineering, compromised credentials and attempts to circumvent authentication controls. Increasingly, criminals are also leveraging artificial intelligence (AI) to make these attacks more convincing, enabling them to create highly credible emails, messages and other content designed to deceive individuals into disclosing information or granting access.

For adviser firms, the consequences of a cyber incident can extend beyond the immediate disruption caused by an attack. Compromised accounts may provide unauthorised access to confidential client information and increase exposure to fraud and other financial crimes. Taking appropriate steps to protect systems, accounts and data is therefore an important part of maintaining client confidence and supporting the secure operation of your business.

Whilst no security measure can eliminate risk entirely, there are a number of practical steps your firm can take to strengthen your cyber resilience:

1. Use Multi-Factor Authentication (MFA) everywhere possible

Passwords alone are no longer sufficient protection. MFA provides an additional layer of security and significantly reduces the likelihood of unauthorised access, even where credentials have been compromised.

2. Strengthen password management

Use unique, complex passwords for all business systems and online services. Consider using a reputable password manager to generate and securely store credentials. Passwords should never be shared between colleagues or reused across multiple services.

3. Remain vigilant to phishing and social engineering

Many cyber-attacks rely on persuading individuals to take actions they would not normally take, such as clicking a malicious link, sharing credentials, or disclosing sensitive information. AI is making these attacks increasingly convincing by enabling criminals to create professional, personalised, and legitimate-looking communications. Staying alert to unusual requests, unexpected attachments and suspicious links can help reduce the risk of a successful attack.

4. Take a moment to verify

Cyber criminals often rely on urgency and pressure to encourage quick decisions. If a request relates to a payment, changes to account details, confidential information, or access to systems, it is worth taking a moment to confirm it is genuine before proceeding. A quick verification through a trusted channel can often prevent fraud, data loss, or other costly mistakes.

5. Keep systems and devices updated

Ensure operating systems, applications, browsers, and security software are kept up to date. Applying security updates promptly reduces exposure to known vulnerabilities that are actively targeted by threat actors.

6. Review user access regularly

Employees should be granted only the access required for their role. Periodic reviews of user accounts and permissions help reduce unnecessary exposure and limit the potential impact of compromised credentials.

7. Maintain reliable backups

Regularly backing up critical business information and testing recovery processes can help reduce disruption in the event of ransomware, data loss, or other cyber incidents.

8. Ensure staff awareness training is current

Technology alone cannot prevent every attack. Regular cyber awareness training helps employees recognise and respond appropriately to common threats. Training programmes should increasingly cover AI-enabled threats, including sophisticated phishing attempts, impersonation techniques, and other forms of digital deception.

Simple steps, meaningful impact

As cyber threats continue to evolve, simple security measures such as MFA, strong password management, and a healthy degree of scepticism towards unexpected communications can make a significant difference. By maintaining good security practices, you can reduce your exposure to cyber threats and better protect your clients, your information, and your business.

7. The Transact–BlackRock MPS update

Retirement strategies lunches – back on the road!

It has been great to get back on the road with our Retirement Strategies Lunches. During September, we welcomed advisers to events in Birmingham and Leeds to discuss the practical challenges of supporting clients as they approach and move through retirement.

Thank you to everyone who joined us. The sessions generated some fantastic discussion around building effective retirement propositions, managing withdrawals and tax efficiency, and selecting investment strategies that can support clients throughout retirement.

Upcoming locations and registration links:

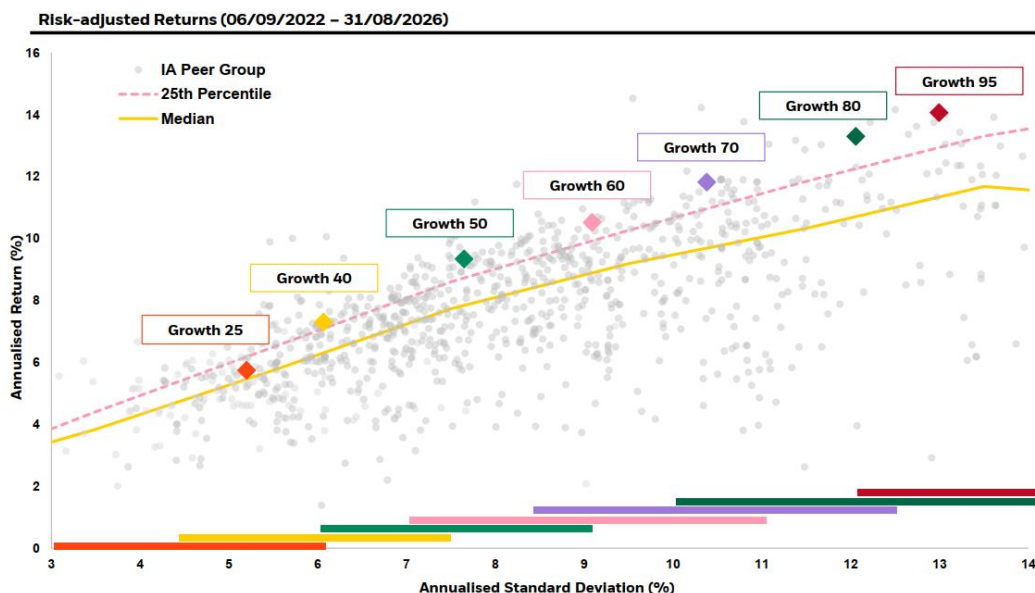
When	Where	Register
25 Nov 2026	12pm -2pm The Ivy, Bournemouth	Bournemouth Register Here

Unstructured CPD accreditation will be available to all attendees.

Latest peer group performance

We are pleased to report that all models continue to perform well against their peer groups on a risk-adjusted basis, while remaining within their defined risk targets. Importantly, this strong performance has been delivered while keeping portfolios within their intended risk levels, helping advisers remain aligned to client objectives through different market conditions.

Peer Group Performance – Since Inception



The figures shown relate to past performance. Past performance is not a reliable indicator of current or future results. BlackRock, Morningstar as at 31/08/2026. For illustrative purposes only. Performance numbers are in GBP, official net with inception date of the model portfolio range at 6 of September 2022. Peer group performance shows net, total return performance of GBP denominated multi-asset portfolio's available for UK investors, illustrated by the Investment Association's Mixed Investment, Volatility Managed and Global Investment sectors.

Using the Transact - BlackRock MPS at retirement

This [practical guide](#) provides a framework for using the MPS as part of a Centralised Retirement Proposition. It brings together the key considerations of longevity, sequencing risk and income generation, alongside practical guidance on cash-flow modelling, portfolio selection, tax-wrapper and withdrawal sequencing, and regular client reviews.

The guide also considers how Transact sub-wrappers and the cash facility can support a bucket-based approach, with assets segmented according to clients' spending needs, longer-term investment objectives and intended legacies.



An adviser's guide to retirement investing

This [guide](#) takes a deeper look at three important retirement investment objectives: guarding against longevity drift, managing sequencing risk and replacing income from salary. It provides a straightforward framework to help advisers assess the investment requirements of clients approaching or already in retirement.

It explores the role of growth-focused portfolios across different volatility levels, the importance of downside resilience and bucket-based planning, and the use of controlled unit encashment to provide regular client payments.

Together, the guides provide both a practical overview of how the Transact - BlackRock MPS can support retirement planning and a more detailed exploration of the investment challenges advisers need to consider.



More information and get in touch

If you have any questions about the service, need help with managing client wrappers linked to BlackRock or need to know where to find the latest marketing support material, please get in touch using our dedicated MPS support mailbox or phone line.

Email: TransactMPS@integrafin.co.uk

Telephone: 020 7603 8025

For financial adviser use only. The value of investments and any income from them can fall as well as rise. Clients may not get back the amount originally invested.

8. Budget speculation – more changes to capital gains tax?

As we approach the Autumn Budget on 28 October 2026, it is difficult to ignore some of the rumours and speculation that are making headlines in the media.

Once again, we hear speculation about the possibility of changes to pension taxation – although with the seismic changes already scheduled for April 2027, when most unused pension funds and death benefits come into scope for Inheritance Tax (IHT), hopefully they will be left alone this year.

Individual savings account (ISA) changes are also scheduled for April 2027, when the cash ISA subscription limit falls to £12,000 for those aged under 65, and so it seems unlikely that there would be further changes in the near term.

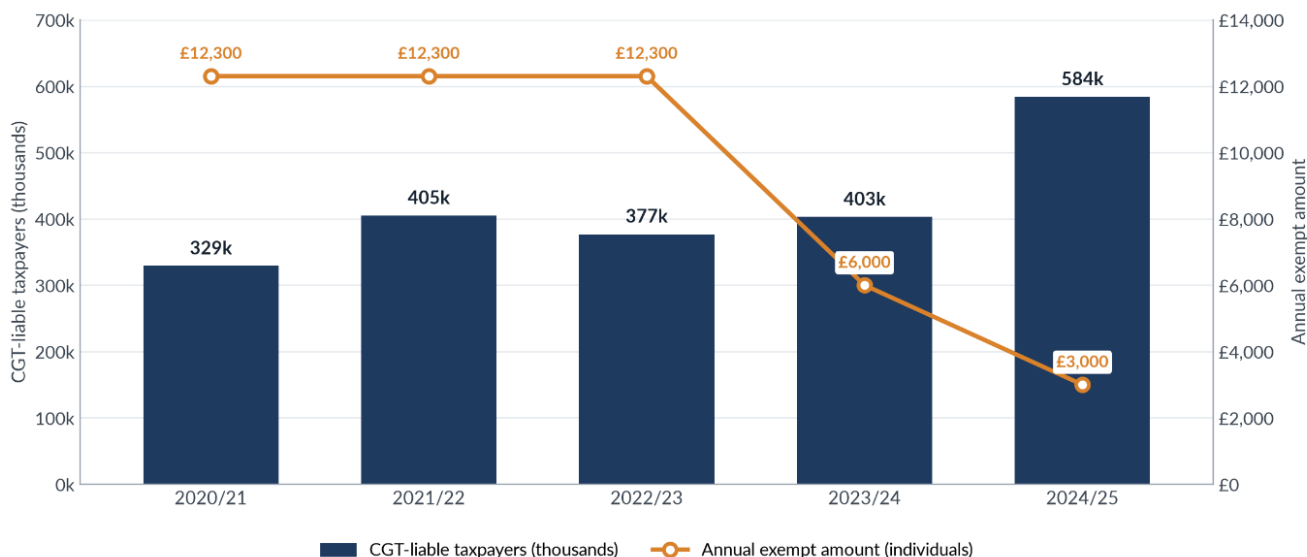
What has not gone away is the call for higher taxes on wealth. Most of the attention is on capital gains tax (CGT) – a tax that has already seen significant changes to both its rates and its annual exempt amount in recent years.

What the latest figures show

HMRC's 2026 CGT statistics, published in August, show record gains and CGT liabilities for 2024/25. The annual exempt amount was cut from £12,300 to £6,000 in 2023/24 and then to £3,000 in 2024/25, and the number of CGT taxpayers rose by 45% to 584,000 in 2024/25:

CGT taxpayers vs the annual exempt amount, 2020/21 to 2024/25

Number of CGT-liable taxpayers (bars, left axis) and annual exempt amount for individuals (line, right axis)

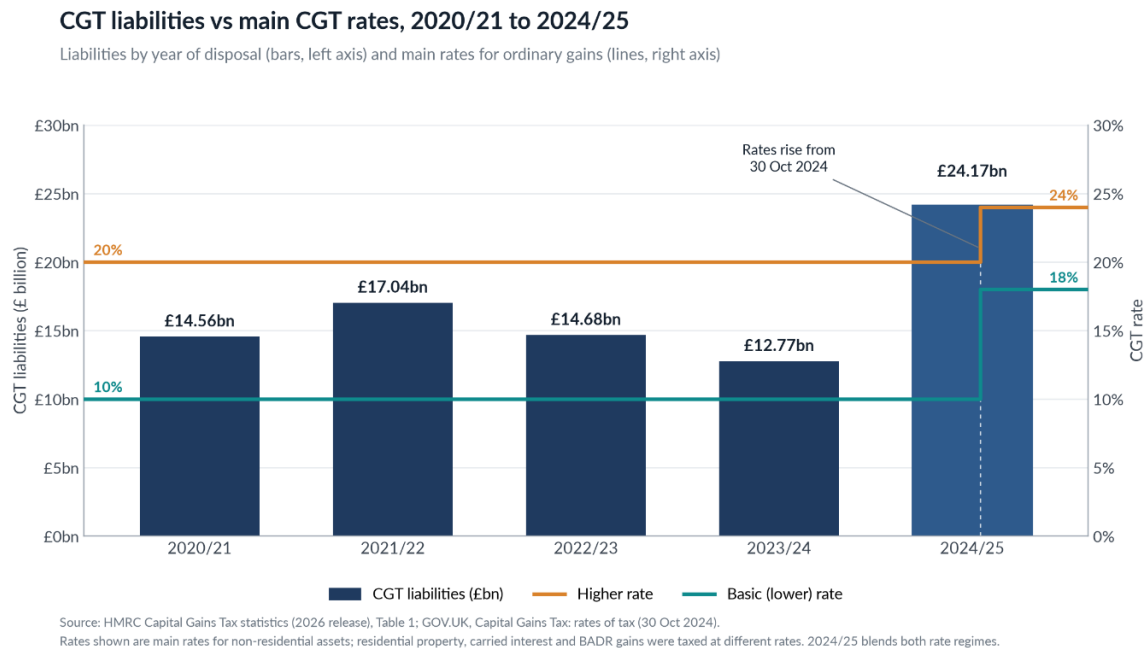


Source: HMRC Capital Gains Tax statistics (2026 release), Table 1; allowance per Autumn Statement 2022.

Taxpayer counts are by year of disposal and include trustees as well as individuals. Trustees have a separate, lower allowance (half the individual amount).

The allowance cuts are only part of that story. HMRC estimates that the two reductions brought up to 163,000 taxpayers into scope for 2024/25, but between them these taxpayers reported only £1.1bn of gains and £108m of tax. The larger effect was on those already paying CGT, with around £4.8bn of additional gains charged overall.

We also saw an increase to the main rates of CGT from 10% and 20% to 18% and 24% for disposals made on or after 30 October 2024. Shown below are the historic rates alongside the corresponding CGT liabilities for the relevant year:



CGT liabilities rose by 89% to £24.2bn in 2024/25, on gains of £127bn. HMRC does not quantify how much of this is due to the higher rates applying for part of the year, as opposed to taxpayers bringing forward disposals to beat those same rate rises. It also points to the pre-announced increases in the Business Asset Disposal Relief rate (to 14% from April 2025 and 18% from April 2026) and the cut in the residential property higher rate from 28% to 24% from April 2024 as contributing factors. What is clear is that a significant part of the 2024/25 spike reflects one-off changes in behaviour rather than a new baseline.

So, what new changes are being talked about?

Looking at the above chart, it would be easy to believe that simply increasing the rates of CGT will generate additional revenue. A range of possibilities has been suggested, from a modest rise in the current rates to full alignment with income tax rates. There are also renewed calls to remove or restrict the CGT uplift on death, under which assets are rebased to their market value at the date of death with no CGT charge.

Nothing has been confirmed. However, when the main rates last changed, the new rates applied to disposals made on or after Budget Day itself, and anti-forestalling rules were introduced for certain unconditional contracts entered into before Budget Day but completed afterwards. One should not assume there would be any lead-in period this time.

Planning considerations

This speculation gives rise to a number of financial planning considerations that you may wish to explore:

- Review unrealised gains: identify clients with significant unrealised gains and model the impact of different outcomes, including full alignment with income tax rates.

- Timing of disposals: for CGT, the date of disposal is the date of the contract (the trade date for listed investments), not settlement. If any change took effect from Budget Day, disposals would need to be made no later than 27 October 2026.
- Weigh up the costs: crystallising a gain now means paying tax with certainty, and earlier, to guard against a change that may not happen. For older or seriously ill clients, it also gives up the uplift on death if that survives the Budget. Time out of the market and dealing costs should also be considered.
- The 30-day rule: where the same shares or units are repurchased within 30 days, the 'bed and breakfasting' rule matches the sale with the repurchase, so the gain is not crystallised at current rates. Buying back through an ISA, a pension or a spouse or civil partner, or into a similar but not identical fund, avoids this.
- Bed and ISA and Bed and Pension: consider bringing forward any planned arrangements, within the £20,000 ISA subscription limit and the pension annual allowance (including any tapered annual allowance or money purchase annual allowance) and relevant UK earnings for tax relief.
- Use allowances and losses: make sure the 2026/27 annual exempt amount and any available losses are used and consider no gain/no loss transfers between spouses and civil partners to make use of both annual exempt amounts and basic rate bands.

As ever, decisions should be driven by the client's wider objectives, individual circumstances and the rationale for acting ahead of an unconfirmed change, should a decision be made to do so, should be recorded.

What it could mean for investment bonds

Any increase to the rates of CGT will affect the tax analysis that compares directly held investments with an onshore or offshore bond. Directly held investments are taxed each year on dividends and interest, and CGT can arise whenever holdings are sold or switched. One of the many features of investment bonds is that they allow investors to defer personal tax on the underlying investments until a chargeable event gives rise to a chargeable gain, and switches within the bond do not give rise to a personal tax charge. With an offshore bond, the underlying fund largely rolls up gross; with an onshore bond, the life company pays tax within the fund, and the gain comes with a non-reclaimable basic rate tax credit.

This deferral is most valuable where the investor's tax rate is lower when the gain is realised – for example in retirement, or by assigning segments to a lower rate taxpayer. However, bond gains are taxed as savings income, so neither the CGT annual exempt amount nor the lower CGT rates are available. From 6 April 2027 the savings rates of income tax rise to 22%, 42% and 47%, and the onshore bond tax credit rises from 20% to 22%, so the further tax payable by a higher or additional rate taxpayer on an onshore bond gain is unchanged.

If CGT rates are aligned with income tax rates, the rate advantage that direct holdings currently enjoy would largely disappear, and the deferral, control and top-slicing features of investment bonds would strengthen their tax appeal for a much wider range of investors. This would be even more so if the CGT uplift on death were also removed, as bonds do not benefit from it – on the death of the last life assured, the gain on the bond is taxed as income.

All information is based on our understanding and interpretation of applicable law and regulation which is subject to change. Tax treatment depends on individual client circumstances and may change in the future.

9. The pre-Budget pension panic – act in haste, repent at leisure

As the Autumn Budget on 28 October approaches along with a need to raise more tax, we once again face speculation about the future of pension tax-free cash. With officials refusing to rule out any changes, the last two budgets have shown that the fear of change is sufficient to shape client behaviour.

The Financial Conduct Authority's latest retirement income market data shows that the total value withdrawn from pension pots rose by 21.7% to £91.2bn in 2025/26, up from £75.0bn in 2024/25 and £53.6bn in 2023/24.

The wish to 'bank' tax-free cash before the Chancellor stands up is understandable. However, crystallising benefits on the strength of a rumour carries risks that can last far longer than any Budget headline.

The precedent of protection

Previous major changes to pension tax limits have often been accompanied by transitional or protection provisions for individuals affected by the new rules.

- **A-Day (2006):** primary and enhanced protection, alongside scheme-specific tax-free cash protection for members whose lump sum rights exceeded the new 25% limit.
- **Lifetime allowance reductions:** reductions to the lifetime allowance led to reductions in the maximum tax-free cash that could be paid. However, fixed protection 2012, fixed and individual protection 2014, and fixed and individual protection 2016 protected pre-existing rights.
- **The introduction of the lump sum allowance (LSA) and lump sum and death benefit allowance (LSDBA):** the new LSA and LSDBA were accompanied by transitional provisions, that meant that some clients could receive more tax free cash than was previously available compared to the previous calculation.

Two points are worth noting. First, restrictions have typically taken effect from the following 6 April rather than on Budget Day itself and the provision of protection meant that there was no panic to access tax free cash ahead of the changes being introduced.

Second, protection has not always been automatic – it often had to be applied for and could come with conditions, such as fixed protection requiring an end to further pension saving. Nobody has a crystal ball, but a rushed withdrawal ignores how sweeping pension reforms have been handled in the past.

An irrevocable decision

Taking tax-free cash is a one-way street. The FCA and HMRC have confirmed that a payment of a pension commencement lump sum (PCLS) or an uncrystallised funds pension lump sum (UFPLS) is not a cancellable contract under FCA rules. Where a provider voluntarily offers additional cancellation rights, exercising those rights would not reverse tax consequences that have already arisen. This means that returning the lump sum will not restore any LSA or LSDBA used when it was paid, and paying tax-free cash back into the pension could also have further tax consequences, including an unauthorised payment where the relevant conditions are met. In the case of an UFPLS, the tax consequences of the original payment also remain, including the triggering of the money purchase annual allowance (MPAA).

Of course, once the cash is outside the pension, it also loses its tax-advantaged status.

The danger of the 11th hour

For clients who decide to take the PCLS ahead of the budget, please ensure that the request is received in good time because leaving the request to the last moment increases the risk of delay:

- Missing historical data, such as details of benefits crystallised before April 2024, which are needed to calculate the remaining lump sum allowance or to apply for a transitional tax-free amount certificate before the client's first relevant benefit crystallisation event.
- Incomplete provider records, or protection certificates that cannot be found.
- Incorrectly completed forms, or instructions that require further clarification.

If a request is caught in a backlog, the payment could be pushed past Budget Day anyway – making the rush pointless and leaving the client in administrative limbo.

The recent surge in withdrawals reflects very real anxiety among savers. Any decision to access pension funds should be driven by a genuine need for capital and a structured financial plan, rather than Budget speculation – and where clients do decide to act, the rationale should be recorded and the request submitted as early as possible.

All information is based on our understanding and interpretation of applicable law and regulation which is subject to change. Tax treatment depends on individual client circumstances and may change in the future.

10. Interest on cash

To support adviser due diligence, we have completed our own desktop analysis of different platforms and their treatment of cash interest. This is based on our review of publicly available information.

The table below sets out current interest rates payable to clients on their cash holdings as well as the retained interest charges levied by the platform (where it is disclosed). Where it isn't disclosed, we have used information from the firm's report and accounts (again if available). We have also included links to the documents we reviewed in the table below. Note that all links to the documents we reviewed were accessed on 8 October 2026, and content may have changed since then.

Some documents are written for customers and advisers; other documents are written for investors. We recognise that it isn't easy for advisers and clients to find the necessary information, so the table below is our best endeavour at this based on the information that we reviewed.

Aviva [announced a change to their approach](#). They now take a margin on the interest received on client cash. Similarly, we are also aware that SS&C Platform Solutions (formerly Hubwise) altered their approach from the 1 August and have moved to retain 25% of cash interest earned. Given their different business and distribution model, we don't currently track SS&C on the table below.

Please let us know if we have missed anything.

Platform	Published client cash interest rate	Explicit platform charge on cash (same level as for investments)	Platform charge on cash (through retained cash interest)	Is retained interest disclosed?	Is amount of retained interest charge disclosed?	Cash charges disclosed (interest retained)	Cash charges (interest retained)	Link to source
Transact	3.76%	✓	✗	N/A	N/A	0%	-	n/a
P1	3.00%	✓	✗	N/A	N/A	0%	-	Link 1
Soderberg	3.00%	✓	✗	N/A	N/A	0%	-	Link 1
Wealthtime Classic	2.85%	✓	✗	N/A	N/A	0%	-	Link 1 & Link 2
Fidelity²	2.30%	✗	✓	Yes	No	-	Unknown	Link 1
Quilter	2.23%	✗	✓	Yes	Yes	1.16%	-	Link 1
Morningstar	2.03%	✗	✓	Yes	Yes	1.40%	-	Link 1
Fundment	2.00%	✗	✓	Yes	No	-	Unknown	Link 1
Nucleus Wrap	1.94%	✗	✓	Yes	Yes	2.11%	-	Link 1
Aviva	1.93%	✗	✓	Yes	Yes	1.12%	-	Link 1
Parmenion¹	1.88%	✗	✓	Yes	Yes	2.08%	-	Link 1
Aegon	1.81%	✗	✓	Yes	No	-	Unknown	Link 1
M&G Wealth	1.79%	✗	✓	Yes	Yes	1.64%	-	Link 1 & Link 2
7IM	1.75%	✗	✓	Yes	No	-	Unknown	Link 1
Aberdeen	1.68%	✗	✓	Yes	No	-	2.51%	Link 1 & Link 2
AJ Bell¹	1.28%	✗	✓	Yes	No	-	2.26%	Link 1 & Link 2
Wealthtime	1.04%	✗	✓	Yes	Yes	2.65%	-	Link 1

Note 1: assumes a £25,000 cash balance held in a SIPP

Note 2: Fidelity's SIPP cash rate is 2.35%; the table shows the standard cash rate of 2.30%.

The rate we pay

As stated above, the annualised rate of interest earned on Transact cash, all of which we pass on to clients, for August 2026 was 3.76% (paid monthly) and this has been credited to client portfolios. Following further positive conversations with our banking partners, we hope to see it increase further in the coming months. At the end of August 2026, clients held on average 7.63% of their portfolio values in cash.

We use eight UK-licensed banks: Barclays, Cater Allen, Clydesdale (now with Nationwide BS), HSBC, Lloyds, NatWest, Royal Bank of Scotland and Santander, and our treasury function expertly manages the cash across different notice periods (up to 95 days - the maximum allowed under the FCA's client money rules). To help you and your clients when considering your FSCS exposures, details of the banks we use and the percentages held with each bank are updated monthly and published [here](#).

11. Transact events 2026

Connect events in 2026

Our in person 2026 events start back in a matter of weeks. Please join us for an informative and sociable event.

At each event you gain access to our Transact leadership team and some of your regional client service operational staff. The event is hosted by **Tom Dunbar, our CEO** who will be joined by **Andrew Cullen-Jones, CDO** plus guest speakers. The agenda for the day typically includes:



- Welcome, Objectives and Agenda
- Priorities & Progress
- Breakout sessions – you can attend two from:
 - Advice Technology, efficiencies and use of AI
 - Marketing - Growing your business with Philip Calvert, founder of LifeTalk
 - Technical - IHT and Pension changes
- Technical update
- Transact CEO Q&A

Attending a Transact Connect event can also count towards CPD. Welcome refreshments will be served from 09:00am, with the morning presentations starting at 09:30am followed by a buffet lunch. You can be back in the office for the afternoon. To register click [here](#).

Date	Location	Venue
21 October 2026	London	Leonardo Royal London, St Paul's
4 November 2026	Cardiff	The Vale Resort
12 November 2026	Warrington	The Park Royal

Breakfast events in 2026

Our breakfast events are hosted by Stuart Fleet, our Head of Distribution, and you can expect:

- Latest tax and relevant regulatory news.
- Engagement with Transact staff and your fellow peers.
- A CPD certificate sent electronically following the event.

Each event will run from 08:30am to around 10:30am with a sit-down breakfast on arrival. The dates are shown below. To register click [here](#).

Date	Location	Venue
15 October 2026	Huntingdon	Old Bridge Hotel
20 October 2026	Bournemouth	The Village Hotel

