

13 March 2026

Final report by the Complaints Commissioner**Complaint number 202500596***The complaint*

1. On 15 December 2025, you submitted a complaint to my office about the FCA. You believe that the FCA is failing to ensure that regulated Firm X is upholding the standard expected under the Consumer Duty with respect to treating vulnerable customers fairly, specifically with respect to X's automatic opt-in for insurance renewals. You explain that, although X claims that opting out of automatic policy renewals is possible through an online account, in reality, the online account redirects consumers to a chat window. This process is particularly challenging for vulnerable customers like yourself. You believe X is breaching the Consumer Duty and want the FCA to take action against the firm.
2. **Outcome: Not Upheld.** The FCA's Decision Letter dated 15 December 2025 was unclear with its message, however, I can see that the FCA reviewed the information you provided appropriately, although due to confidentiality restrictions, I cannot say what action, if any, the FCA took as a result of the information you provided.

Background

3. You previously raised a complaint with both Firm X and the FOS concerning the absence of an accessible online option to opt out of automatic renewals on its motor insurance policies. Neither the firm nor the FOS upheld your complaint on the basis that Firm X's customer online account provides an online option for opting out.
4. I understand your view to be that there was an absence of an accessible option to opt out of the automatic renewal and that the only option available to you, led

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you to a web chat facility, which you found difficult to use. You provided me with screenshots of your online conversation with the customer service team which showed that they explained how to cancel auto-renewal through your online account with Firm X or alternatively they would cancel it for you during the chat. You ultimately resolved your issue through the online chat service with the customer service team at the firm.

5. Following the FOS decision, you formally raised a complaint with the FCA on 26 October 2025. The FCA summarised your complaints as follows:

- a. Part One – You say that the FCA accepted incorrect information from Firm X about the availability of a self-service toggle in Firm X’s online account, which you say does not exist. You explained that your screenshots show the option redirects to a live-chat function instead, and you feel the FCA should have verified Firm X’s statements or taken your evidence into account. You consider this to be maladministration.
- b. Part Two – you also say that the FCA failed to supervise Firm X appropriately in relation to accessibility and the treatment of vulnerable customers. You explained that requiring customers to use live chat as the only way to disable automatic renewal creates unnecessary digital barriers, particularly for vulnerable customers. You believe the FCA should have identified and addressed these issues through its supervisory work.

6. The FCA Stated that *“prior to receiving your complaint, the FCA had not been made aware of concerns about the cancellation process or accessibility barriers for [X]. The FCA did not hold any information, complaints or intelligence relating to the specific issues you have raised. As these concerns had not previously come to the FCA’s attention, there was no basis for the FCA to take action in relation to the cancellation route for this product. On that basis, I have not upheld this part of your complaint”*.

7. Subsequently, you raised your complaint to my office.

Analysis

8. I have considered your complaint that the FCA has not adequately investigated the concerns you have raised in relation to Firm X and its automatic renewal system for its motor insurance policies.

9. It is my view that the message provided to you by the FCA was not very clear and I can see how you would be justifiably concerned that the FCA had not reviewed the substance of your complaint. However, it is my understanding that this is not the case. To the extent that the FCA had not (prior to your concerns) received any other complaints about the cancellation route for Firm X's insurance policies, it is correct that it had by that point, not had cause to take action, as it explains. However, irrespective of what action it did or did not take in the past, clearly you provided information to the FCA which you asked it to review. I can confirm that the FCA did take steps to review the issue, although it fell short of explaining this in its decision letter.
10. The FCA Complaints Team made enquiries with the relevant supervisory area. Supervision reviewed and logged the concerns you raised and made a decision based on its assessment.
11. I consider the steps taken and the decisions made by the various FCA teams to be reasonable. The information you provided to the FCA has been considered appropriately, and I am satisfied that the actions of the FCA were reasonable. For this reason, I do not uphold your complaint.
12. However, under Section 348 FSMA, there are restrictions on the FCA's ability to share certain information about firms and registered societies (for example non-public information about their business or other affairs, that has been received by the FCA for the purpose/in discharge of its functions). This provision, to which both the FCA and I are subject, makes it a criminal offence to disclose such information.
13. In addition to this, any information that is not restricted by s.348 FSMA may be restricted due to the FCA's policy on sharing information about regulated firms and individuals, who also have legal protections. Under this policy, the FCA will not normally disclose the fact of continuing action without the agreement of the firm concerned. There is a good explanation of the statutory and FCA policy restrictions on information sharing [here](#). This means that, there is no general right for members of the public to know the outcome of reports that they make.
14. As a result, the treatment of your information about Firm X, is confidential under section 348 FSMA and/or its general policies on confidentiality.

15. Like the FCA, I am also subject to s348 FSMA and confidentiality restrictions and as such, this report is not able to cover much of the underlying material I have seen in detail.
16. However, as part of the Complaints Scheme, I have access to all the FCA's complaints papers, including confidential material. This is so that I, as an independent person, can see whether I am satisfied that the FCA has behaved reasonably. Having studied the confidential material, I am satisfied that the FCA has behaved reasonably – but I am unable to give further details. This can be frustrating for complainants, but it is better that I am able to see the confidential material.

Decision

17. My conclusion is that the FCA has not acted unreasonably in its review and investigations of your submissions, albeit the Regulator could have been clearer in its Decision Letter. For this reason, I **do not uphold** your complaint.

The Complaints Commissioner

Complaints Commissioner

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