



# Breaking Bad Thinking

The Advice Gap, AI, and the New Paradigm

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## Foreword: What Has Changed

*“The formulation of a problem is often more essential than its solution.”*

— Albert Einstein

When the original three papers in this series were published in 2024, they set out a thesis: that the financial advice industry was framing its central challenge incorrectly, that disruption was both necessary and inevitable, and that the firms who moved first would operate in a fundamentally different way from those who waited.

Two years on, that thesis has not simply held — it has accelerated beyond the pace even those papers anticipated.

The AI landscape has transformed. What were experimental capabilities in 2024 are now deployable infrastructure. Firms are no longer asking “could AI help us?” — they are asking “why haven’t we done this yet?” And yet the industry’s structural response remains largely the same: incremental process improvements, feature additions to existing tech stacks, cautious pilots. The gap between what is possible and what is being done has never been wider.

This updated paper integrates the thinking from all three original chapters — the reframing of the advice gap, the case for market disruption, and the evolution of adviser technology — into a single, updated thesis. It adds what two years of building, deploying and operating has taught us. And it introduces, with more clarity than was previously possible, what the new paradigm actually looks like in practice: not as a vision, but as a thing that exists and works.

*The spoon is still not there. But the kitchen has changed completely.*

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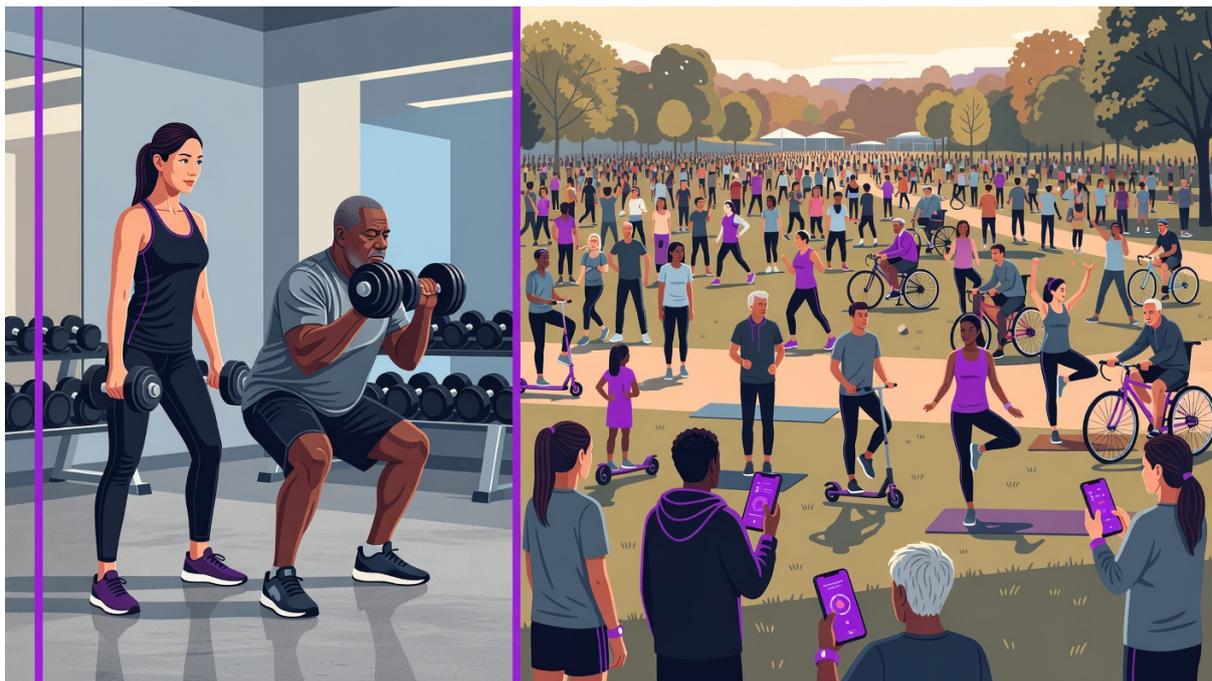
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## Part One: There Is No Spoon (Revisited)

### The Problem with the Problem

The advice gap — broadly defined as the disparity between the ~4 million people in the UK who receive regulated financial advice and the ~39 million who would benefit from some form of financial guidance — continues to grow. This is despite years of industry discussion, regulatory encouragement, technology investment, and genuine goodwill from many quarters.

The original thesis was simple: the problem is not being solved because it is not being framed correctly. Calling it an “advice gap” frames regulated financial advice as the desired outcome for all 39 million people, and therefore frames financial advisers as the ones responsible for closing it.



*The personal training analogy: would we say there is a personal training gap?*

The personal trainer analogy still holds. We would not say there is a “personal training gap” simply because 80% of the UK population does not use a personal trainer. We would say there is an exercise problem — a broader challenge of physical inactivity that personal trainers can contribute to solving, but cannot and should not be expected to solve alone.

The same is true of financial health. What 39 million people need is not a regulated financial adviser — at least, not as their first point of contact. What they need is to be financially active. To engage with their money. To make better decisions. To begin building financial awareness and, over time, financial fitness.

*Regulated financial advice sits at the top of the continuum. Treating it as the baseline metric of success is like measuring a public health programme by how many people have seen a surgeon.*

## **What Has Changed: The Framing Is Now Worse**

In 2024, the framing problem was largely an intellectual one. In 2026, it has become operationally damaging.

Consumer Duty has pushed firms further right, not further left. Rather than expanding their propositions to serve more people, firms have responded to the compliance burden by tightening their minimum AUM thresholds and off-loading lower-value clients. The average minimum investible asset requirement has continued to rise. The number of people receiving advice has not significantly increased, and in some segments has decreased.

Meanwhile, AI has created an entirely new class of capability — one that could genuinely reach the 39 million — but the industry's response has been to layer it onto the existing model as a cost-saving measure, rather than rethinking the model entirely.

*More efficiency innovation on the right. No meaningful new market-making on the left. This is the most expensive version of standing still.*

## **The Reframing (Updated)**

**The old framing:** There is an advice gap. Financial advisers should close it by becoming more efficient and serving more clients.

**The updated framing:** The UK population is financially sedentary. Financial services businesses have an opportunity to change that by building engaging, scalable propositions that meet people where they are and move them along a continuum toward financial fitness, with regulated advice available at the far end for those who need it.



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## Part Two: The Disruption Case (Reinforced)

### The Preconditions Are All Present

The original paper made the case that the financial advice market met all the preconditions for disruptive innovation. All five preconditions have strengthened since 2024.

- The market is larger and more defined. 8.4 million UK adults with £10,000 or more in investible assets received no formal financial advice. An estimated £150bn in uninvested assets represents a 50%+ market increase opportunity.
- Stagnation has deepened. The average age of financial advisers is approximately 58. The standard operating model remains largely unchanged. M&A activity has slowed technology adoption, not accelerated it.
- Technology has advanced beyond the industry's adoption rate. The gap between what is technically possible and what advice firms are actually doing has never been wider.
- The threat of obsolescence is now real. Digital-first platforms, bank self-serve tools, and AI-native fintechs are entering the space.

### What Disruption Looks Like in Practice

**Efficiency innovation** is further along than most firms realise. Annual review processes that currently cost firms approximately £800 per client and five hours of staff time can be reduced to under thirty minutes through automated digital journeys. That is an 80%+ time saving.

**Propositional innovation** — the expansion of advice firm activity into unregulated financial development, coaching, content, and community — is emerging but nascent. The MyWealthVault platform, developed by Ningi for Eva Wealth, is an example of what this can look like in practice.

**Distribution innovation** is the area of greatest untapped potential. Employer-based distribution, subscription pricing models, and content-first acquisition remain largely unexplored by traditional advice firms.

### The Efficiency Trap

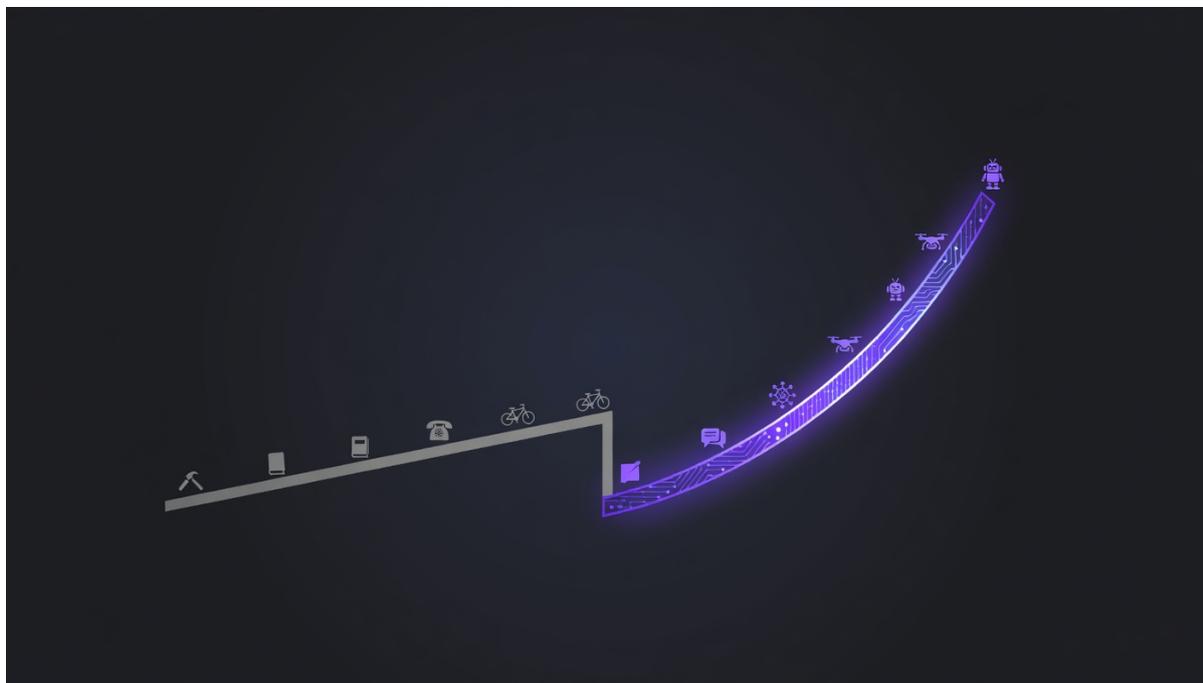
Efficiency innovation alone will not close the advice gap. Making advice 50% more efficient means one adviser can serve 170 clients instead of 115. Neither gets anywhere near the 2,000–3,000 clients per adviser that would be required to meaningfully address the macro opportunity.

*The efficiency trap produces firms that are incrementally more profitable but no more impactful.*

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## Part Three: The AI Inflection Point



*The gap between what AI makes possible and what firms are doing has never been wider*

### What Has Changed Since 2024

In early 2024, the relevant AI capabilities were primarily around note-taking, summarisation, and drafting. By 2026, the relevant capabilities include:

- Autonomous agents capable of completing multi-step tasks without human intervention — chasing letters of authority, populating fact finds from meeting transcripts, generating compliance documentation
- Retrieval Augmented Generation (RAG) enabling AI to reason over a firm's own data — client records, documents, communications, investment philosophy
- Embedded compliance intelligence that reviews processes against FCA standards in real time
- Personalised client communication reflecting firm tone, client circumstances, and specific financial plan
- AI-native interfaces replacing traditional form-based workflows with conversational interactions

A compliance task that previously required 50 hours of manual preparation can now be completed by an AI agent in seconds. This is not efficiency. This is transformation.

## The Data Sovereignty Problem



*Client data stays within the firm's own GDPR-compliant infrastructure*

One of the most important barriers to AI adoption in financial services is data sovereignty. Using AI tools with client data requires sending that data to third-party servers — in many cases, US-based infrastructure outside the GDPR-compliant data environment that firms are required to maintain.

The resolution is not to forgo AI. It is to build an AI environment in which the data stays within the firm's own infrastructure: a dedicated data environment, an AI model instance running within that environment, EU-hosted, GDPR-compliant architecture.

## From Features to Agents



*Purpose-built agents: compliance, research, reporting, operations, and financial development*

An agent is an AI system with a specific skill set, access to relevant data, and the ability to complete a defined task autonomously or semi-autonomously. Unlike a feature, which assists a human in doing something, an agent does the thing — and escalates to a human only when it needs to.

- Compliance agent — reviews processes against FCA standards, generates audit documentation, flags inconsistencies
- Investment research agent — analyses fund data and the firm’s own CIP, reduces dependence on expensive third-party research
- Client reporting agent — generates valuations, review packs, and communications tailored to firm tone and client circumstances
- Operations agent — summarises meetings, drafts follow-up actions, triages requests, manages compliance deadlines
- Financial development agent — provides guidance, education, and coaching to consumers not yet ready for regulated advice

*Without a unified, structured data environment, agents are hobbled. With it, they become the operating system of the firm.*

## **The Single Platform, Revisited**



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## Part Four: The New Operating Model



*Unified data foundation, AI agents, and tiered propositions — from mass market to full advice*

### What a Modern Advice Firm Looks Like

- A unified data environment — all client data in one structured, secure, GDPR-compliant data store
- A single platform spanning the full advice process — from client attraction through to compliance documentation
- AI embedded throughout, not bolted on — purpose-built agents handling compliance, research, reporting, and operations
- A tiered proposition covering the full client continuum — from mass-market financial development to sophisticated regulated advice
- Multiple revenue streams and flexible pricing — traditional fees, subscriptions, courses, content, community
- Distribution at scale — employer schemes, social media, digital tools, partnerships

### The Ningsi Stack in Practice: Eva Wealth

The work done with Sarah Roughsedge and Eva Wealth provides a concrete example. From a single codebase and shared infrastructure, Ningi built a complete digital financial planning platform (MyWealthVault) — combining guided courses, an AI financial coach trained on the firm’s own content, community forums and challenges, a gamified achievement system, investment tools, a document vault, and a lifetime cashflow model.

The result is a firm that can engage its target audience at the very beginning of their financial journey — at the point of curiosity, not crisis — and accompany them through to regulated financial planning.

### **The Ningi Stack in Practice: Acacia Wealth**

Acacia Wealth represents the leading edge for an established advice firm going AI-native. Everything the firm touches flows into a single secure data environment. Purpose-built AI agents provide compliance support, investment research, automated client reporting, and operations management. EU-hosted, GDPR-compliant, dedicated AI model instance.

A compliance task that previously required 50 hours was completed in 7 seconds. Annual review packs are generated automatically. Research is produced by an agent trained on public fund data and the firm’s own investment philosophy.

*This is not a one-time implementation. It is a continuously evolving partnership.*

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## Part Five: Breaking Consumer Inertia

### The Psychological Barrier

The deepest barrier to closing the advice gap is not access, price, or distribution. It is psychology. People who are not currently engaging with their finances are not waiting for a cheaper way to get advice. They are actively avoiding the subject — because it feels overwhelming, irrelevant, shameful, or simply unpleasant.

*“People don’t think what they feel, don’t say what they think, and don’t do what they say.”*

— David Ogilvy

### What Works

- Social and community-based approaches outperform information-based ones — people in financial communities are more likely to take action
- Well-designed gamification changes behaviour — progress tracking, achievements, challenges, and streaks improve adherence and outcomes
- Identity-based framing matters — Eva Wealth’s proposition is explicitly designed for women, from language to investment products to AI coach tone
- Personalised AI coaching changes the relationship — not a generic chatbot, but trained on the firm’s content, speaking the firm’s voice

### The Continuum



*From financial curiosity to regulated advice — a single, coherent journey*

A user who starts with a Money Mindset Quiz is on the same continuum as a client working with a regulated adviser on their retirement strategy. The journey from one end to the other is a single, coherent experience — not disconnected products.

*Not cheaper advice. Not more efficient advice. A fundamentally different relationship between the firm and the population it wants to serve.*

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## Part Six: Market Predictions

- Single-platform technology will become the baseline expectation within two to three years
  - AI agents will replace significant portions of paraplanning and back-office work within one to two years
  - The advice market will bifurcate — highly personalised at the top, AI-native digital at the bottom, maximum pressure in the middle
  - Consumer-facing financial development propositions will become significant businesses
  - Data ownership will become a competitive differentiator — firms with unified data environments gain compounding AI advantages
  - Subscription pricing will become normal for the mass market
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## Conclusion: The Call to Action

The technology to build a different kind of financial services business exists. It is not experimental or theoretical. It has been deployed, and it works. A firm that builds a unified data environment, deploys AI agents across its operations, creates a tiered proposition, and distributes at scale is not imagining a future — it is operating in a present that most of the industry has not yet caught up with.

*“The firms that refused to believe Netflix was serious carried on improving their store layouts and expanding their food and drink offerings. They were not wrong that these things added value. They were wrong about what the competition was.”*

— Marc Randolph on Blockbuster

The competition now is not another advice firm with a better tech stack. It is a world in which every person in the UK has a financially intelligent companion in their pocket — one that knows their circumstances, speaks their language, and guides them from their first tentative engagement with their finances all the way through to a retirement that actually works.

*There is still no spoon. But there is a kitchen full of possibility, and it is time to start cooking.*

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## Summary of Key Propositions

**On the advice gap:** The framing is counterproductive. The real challenge is financial inactivity among 39 million UK adults. The solution is a fundamentally different engagement model.

**On disruption:** All preconditions are met. Disruption is not merely possible — it is required. Early movers build structural advantages that are difficult to replicate.

**On technology:** The future is a single, horizontally integrated platform with AI embedded throughout. Configuration drift is especially costly in an AI-accelerating environment.

**On AI:** AI is an operating environment, not a feature to bolt on. Data sovereignty and a unified data foundation are prerequisites for meaningful deployment.

**On consumer behaviour:** The deepest barrier is psychological. Identity-based community propositions, gamification, and AI coaching are more effective than information and access alone.

**On the new model:** Firms of the future operate across the full continuum — from mass-market financial development to regulated planning — with AI woven through every interaction and a data environment that compounds in value over time.



## Get in Touch

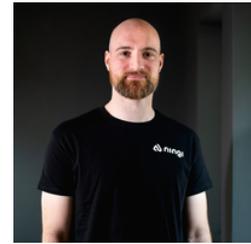
We'd love to talk about how Ningi can help your firm.



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