

keynotes

presentations

panels

networking

associates



LEADING THE WAY

CCCTA CONFERENCE



welcome

LEADING THE WAY

As Chair of CCTA, I am delighted to extend a warm welcome to all attendees of the 2023 'Leading the Way' Conference.

We last met in April 2022, with a great conference in Liverpool; it was invigorating to meet in person after the restrictions placed on us during the pandemic. Discussions centred on how firms had adapted during those unparalleled times. Those conversations were enlightening and deeply resonant.

The programme for this year promises to be equally, if not more, engaging. We have a packed agenda that addresses pivotal topics faced by our members and the broader market.

We are fortunate to be joined by exceptional speakers, many of whom are recognised authorities in their respective fields. Each has given their time to develop contributions that draw on their expertise and insight. They have our sincere gratitude.

I know our other speakers will forgive me if I also say special thanks to both the Financial Conduct Authority and the Financial Ombudsman Service for their continued participation. It's been a consistent belief within the CCTA that members need to hear directly from the organisations that have a real impact on our sectors.

The consumer credit industry is navigating a sea of challenges, accentuated by the prevailing economic backdrop. The cost-of-living crisis is putting pressure on household finances, and many people are struggling to make ends meet, amplifying the need for regulated credit.

Simultaneously, the regulatory environment is becoming more complex. The Consumer Duty comes as one in a series of major developments that will change the way we are regulated. In this challenging environment, it is more important than ever for each of us to understand the needs of our customers and the latest regulatory developments.

This conference, I am confident, will serve as a pivotal platform for mutual learning and sharing of best practices. Of course, it will also be a chance to network with industry figures and make new contacts.

This event could only happen with the financial help of our conference supporters. Please ensure you pass on your appreciation.

Lastly, my profound thanks to the dedicated CCTA team whose tireless efforts have made this event possible.

Wishing you all a productive and insightful conference.

Mark Fiander
Chair, CCTA

CONFERENCE

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SPEAKERS

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09:15

09:25

09:35

10:20

10:35

10:55

11:25

12:10

12:20

WELCOME

Event details & housekeeping
Mark Fiander, Chair, CCTA

INTRODUCTION

Introduction from CCTA
Jason Wassell, Chief Executive, CCTA

NAVIGATING THE UNKNOWN

The alternative lending customer in 2023
With thanks to our panel sponsor, Data on Demand

SQUARE 4 PRESENTATION

Target operating model within a mass claim environment
Tom Jeffery, Advisory Director (Operations & Remediation) Square 4

MORNING BREAK

Refreshments & networking
Please be re-seated by 10:50

KEYNOTE SPEAKER

Update from the FCA
Martha Stokes, Head of Consumer Lending, FCA

UNDERSTANDING THE LANDSCAPE

The latest regulatory changes
With thanks to our panel sponsor, Themis Consultancy

PERCH VERIFY PRESENTATION

Do you really know your customer?
Andrew Bartle, Chief Commercial Officer, Perch Group

NETWORKING LUNCH

Lunch sponsored by Lantern
Please be re-seated by 13:15

A DIFFICULT PATH AHEAD

The impact of reduced access to credit
With Fair4All Finance and the Centre for Social Justice

CCTA PRESENTATION

An introduction to CCTA Academy
Naveed Asif, Head of Policy & Advice, CCTA

FRONT OF THE GRID

The latest innovations in lending
With thanks to our panel sponsor, Qualco

AFTERNOON BREAK

Refreshments & networking
Please be re-seated by 15:05

DELEGATE RAFFLE

£500 Amazon voucher prize
Hand your raffle card in at registration by 15:00

WALKER MORRIS PRESENTATION

The FCA's expectations for borrowers in financial difficulties
Leanna Bradshaw, Director, Regulatory, Walker Morris

KEYNOTE SPEAKER

Working with the Financial Ombudsman Service
Kevin Wright, Ombudsman Leader – Consumer Credit, FOS

EVENT CONCLUDES

13:20

13:55

14:05

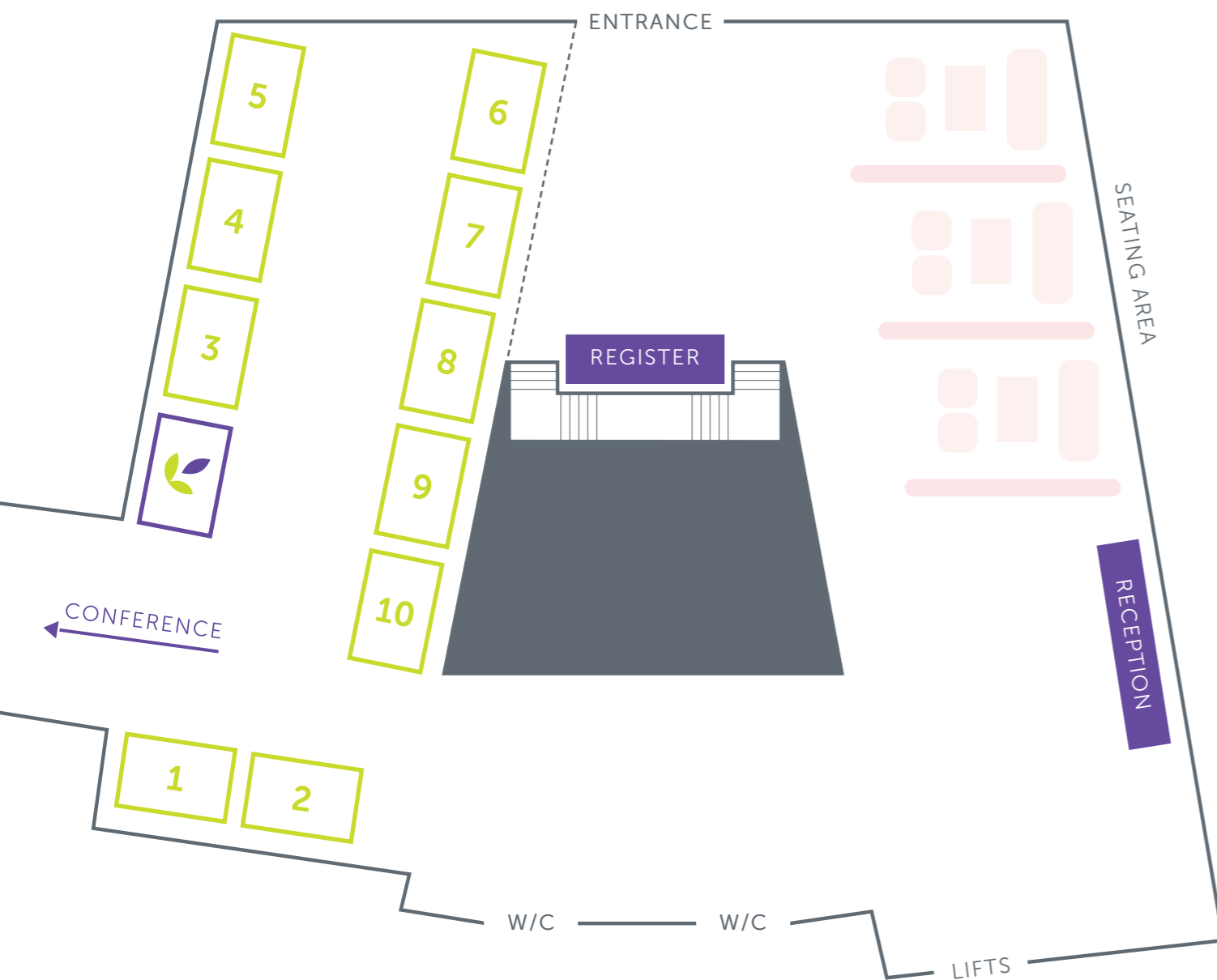
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16:00



STAND 1

STAND 2

STAND 3

STAND 4

STAND 5

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STAND 10

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WIN A £500 AMAZON VOUCHER

Collect six stickers from exhibitors and affix them to the postcard you were given when you registered. Hand this back to the registration desk during the afternoon break to enter our raffle for a £500 Amazon voucher.



PRESENTATION

AN INTRODUCTION TO CCTA ACADEMY

Recognising the importance of learning and development in a regulated environment, CCTA will be showcasing a multifunctional portal covering online compliance training, CPD accreditation, live learning sessions and sector-specific modules. An overview of the portal and its functionality will be provided in our afternoon presentation.



Naveed Asif
Head of Policy & Advice
CCTA



Kate Emmerson
Consultant
CCTA Academy



PRESENTATION

INTRODUCTION FROM
CONSUMER CREDIT TRADE ASSOCIATION

Jason will welcome our delegates, recognising that this is one of the best opportunities to hear from members and discuss the issues that we face.

It has been a challenging year on many different levels. There have been buffeting winds across the economy and several regulatory dynamics. The association has adapted, with an increased focus on advice and guidance. Jason will also discuss the work of the CCTA team in his introduction.

Jason will also briefly talk about the wider strategic approach, and how CCTA is planning for 2024.



Jason Wassell
Chief Executive
CCTA



PRESENTATION

TARGET OPERATING MODEL IN A MASS CLAIM
ENVIRONMENT - PROTECT YOUR CULTURE

Whether it's a reactive mass claim event or a proactive remediation exercise, we're advocating a standalone Target Operating Model overlaid with good governance and budget management. We will also talk about an associated resource planner to ensure you're right sized.

Protecting your well-cultivated consumer-focused culture and leadership team from the bleed out of a mass claim/remediation event is key to sustaining customer-focused operations in a post-Consumer Duty landscape. We aim to highlight some of the practices and points you need to be considering now through insights pulled from years of executing such initiatives.



Tom Jeffery
Advisory Director
Square 4



KEYNOTE

KEYNOTE: UPDATE FROM
THE FINANCIAL CONDUCT AUTHORITY

We are pleased that the FCA has once again accepted our invitation to speak directly to the membership about some of the key regulatory issues we all face.

This is an opportunity to learn more about areas of priority for the FCA, with a focus on the sectors that we operate in. Understanding their perspective will allow you to make better decisions about your future strategy.

Martha will talk about developing the regulatory framework, consumer outcomes (including Consumer Duty), the cost of living, and the role we can all play in delivering access to credit.



Martha Stokes
Head of Consumer Lending
FCA



PRESENTATION

DO YOU REALLY KNOW YOUR CUSTOMER?
THE EVOLUTION OF FIELD SERVICES

Andrew will join us to talk about the evolution of field services within the credit industry. His presentation will focus on the use of data and technology, and the benefits to both the customer and the lender.

Andrew will also cover the identification of vulnerability and financial difficulty, and what the future might hold considering the potential further effects of the ongoing cost-of-living crisis on consumers.

He will discuss how lenders can benefit from using field representatives at every stage of the customer journey. Andrew will share insights from Perch about what they are seeing within their organisation around these services and what lenders can gain from these options.



Andrew Bartle
Chief Commercial Officer
Perch Group



PRESENTATION

THE FCA'S EXPECTATIONS FOR
BORROWERS IN FINANCIAL DIFFICULTIES

For a number of years now, the FCA has had a firm focus on helping borrowers in financial difficulties. Following the coronavirus pandemic, and further motivated by the cost-of-living crisis, the FCA seems keen to take a more active role.

We are moving away from a regulatory regime where firms can simply consider the high-level Principles for Businesses and the rules and guidance in Chapter 7 of CONC; the FCA expects firms to do more to put customers' needs first and to deliver good outcomes.

To this end, the FCA has published a significant amount of guidance for firms. We consider the implications of this approach and the key considerations for firms.



Leanna Bradshaw
Director, Regulatory
Walker Morris LLP



KEYNOTE

KEYNOTE: WORKING WITH THE
FINANCIAL OMBUDSMAN SERVICE

The Financial Ombudsman Service is changing to deliver faster results for consumers and firms while maintaining the quality of its decisions. Kevin will talk through what that means in practice, what firms need to consider in working with the Ombudsman, and how we can help firms to resolve problems as they arise.

Kevin will cover key issues and trends in complaints about credit, the implications of the Consumer Duty, and our work to ensure that claims management firms and professional representatives bring complaints in the right way.



Kevin Wright
Ombudsman Leader
Financial Ombudsman Service



NETWORKING

VISIT OUR EXHIBITOR STANDS
DURING THE NETWORKING BREAKS

Our annual conference is made possible by the support provided to us by our sponsors and exhibitors. Be sure to visit their stands during our lunch and networking breaks today.

You can also enter our raffle for a chance to win a £500 Amazon voucher. Simply collect six stickers from our exhibitors, affix them to your delegate postcard and hand in to the registration desk before the final break.

- Morning break - 10:35
- Networking lunch - 12:20
- Afternoon break - 14:50



PANEL

NAVIGATING THE UNKNOWN

THE ALTERNATIVE LENDING CUSTOMER IN 2023

PANEL OVERVIEW

Long before the notion of Consumer Duty, CCTA talked about the importance of the customers our members serve and of understanding their needs. That discussion continues here with a panel session on the alternative lending customer.

The panel will explore the pressures on UK families around the rising cost-of-living. Are families displaying signs of distress? Have we seen changes in behaviour? How should lenders be responding?

The discussion will look at other factors at play. We are keen to hear from those taking a wider view, alongside those who can share experiences from day-to-day consumer interactions.

PANELLISTS



Denise Crossley

Group Chief Executive Officer
Lantern



Sheraz Afzal

Group Legal, Risk & Compliance Director
Quint Group



Simon Gregory

Sales Director
Data On Demand



PANEL

UNDERSTANDING THE LANDSCAPE

THE LATEST REGULATORY CHANGES

PANEL OVERVIEW

This panel will be a review of regulatory change over the last year and looking to the future.

Among several themes, Consumer Duty stands out. It has been a dominant feature since the FCA set the deadline for implementation, and we know it will continue to be a factor for the foreseeable future. There will be other issues from an evolving regulatory landscape – reform of the CCA, the regulation of BNPL, and increasing complaints around commission practices in motor finance.

This will be an exchange of information as our panel shares their in-depth insights and answers questions from conference attendees.

PANELLISTS



Chris Bennett

Head of Commercial & Partnerships
Fair For You



Naveed Asif

Head of Policy & Advice
CCTA



Andrew Marsh

Chief Executive
Marsh Finance



Nicola Crump

Director & Regulatory Consultant
Themis Consultancy



A DIFFICULT PATH AHEAD

THE IMPACT OF REDUCED ACCESS TO CREDIT

PANEL OVERVIEW

Consumer credit is vital as a means to make essential purchases and manage financial emergencies when immediate funds are insufficient. We were founded over a century ago by a group of lenders that identified a gap in access to credit.

They realised that there were families that could not access the products provided by the banks and were unable to benefit from consumer credit. Since then, credit inclusion has been at the very core of CCTA.

As such, we are delighted to hear from both Fair4All Finance and the Centre for Social Justice about what they have found from their research into improving access to credit.



Niall Alexander
Markets & Consumer Insights Manager
Fair4All Finance



Matt Greenwood
Head of Debt
Centre for Social Justice



Jason Wassell
Chief Executive
CCTA



FRONT OF THE GRID

THE LATEST INNOVATIONS IN LENDING

SESSION OVERVIEW

The alternative lending sector is well known for its use of new technology. In this session, we will discuss recent developments and their impact on the lending process and wider customer journey.

Nearly every innovation event must make mention of Open Banking. Questions to the panel will be where we are, what progress has been made and where we might end up over the next year?

But what else is happening in terms of new support for lenders? We will explore how new products are helping firms to navigate some choppy waters.

We will also look ahead to further developments that might be coming down the track.



Rachel Fairhurst
VP of Credit Risk & Client Success
Bud Financial



AJ Davison
Senior Partner Manager
Acquired.com



Guy Statter
Country Manager, UK & Ireland
Qualco

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PANELLIST

SHERAZ AFZAL
Quint Group
Legal, Risk & Compliance Director

Sheraz is Group Legal, Risk and Compliance Director for Quint Group, which operates a network of fintechs based in the UK, USA, Australia, China and South Africa.

Before joining Quint Group, Sheraz was Chief Risk and Compliance Officer for Dollar Global Finance Corp where he had been responsible for the legal, risk and compliance teams in the UK, Finland, Sweden, Spain, Portugal and Romania.

Prior to this, Sheraz held senior roles within risk and compliance at Welcome Financial Services (Cattles) and also the Royal Bank of Scotland Group. He graduated in law from the University of Edinburgh.



PANELLIST

NIALL ALEXANDER
Fair4All Finance
Markets & Consumer Insights Mgr.

Niall joined Fair4All Finance in 2021, having previously anchored Carnegie's affordable credit work from 2016.

Niall spent the 1990's in community development and regeneration work within two disadvantaged neighbourhoods in Edinburgh; that experience led him to concentrate on affordable credit. He held positions within Bank of Scotland, Airdrie Savings Bank and Moneyline, although most of Niall's work has been in consultancy, addressing the impact on low-income households of a lack of access to financial products.

Niall is a Director of Right Way Credit Union and the Centre for Responsible Credit.



PRESENTATION

LEANNA BRADSHAW
Walker Morris LLP
Director, Regulatory

Leanna, our accomplished Director in Regulatory & Compliance, has over twelve years of experience in the financial services sector. With expertise in consumer finance, she provides guidance on regulatory permissions, compliant documentation, and FCA Handbook advice.

Leanna assists with remediations and non-compliance issues, serving a diverse client base including high street banks, building societies, fintech firms, and motor finance providers. Known for her practical advice, she simplifies complex legal matters, ensuring clients understand their options and associated risks. Building strong client relationships and understanding their businesses is Leanna's passion, as she collaborates to find innovative solutions for legal challenges.



PANELLIST

DENISE CROSSLEY
Lantern
Group Chief Executive Officer

Denise is a highly respected debt recovery industry specialist, with significant experience across a wide range of sectors. She holds the position as Group CEO of Lantern and Sonex, a Debt Purchaser and BPO provider, specialising in the acquisition and management of identified vulnerable portfolios. With a customer base of 4 million and growing, Denise has led Lantern to win several customer service awards consistently over the past five years, including GOLD accreditation from both Investor In Customers and Investors in People.

She is a Fellow of the CICM, Chair of the CSA's A&R Committee and was named as one of the 20 Most Successful Business Women to watch by Insights Success and was presented with a Lifetime Achievement Award at the 2021 Women In Credit event.



PRESENTATION

NAVEED ASIF
CCTA
Head of Policy & Advice

Naveed is the Head of Policy & Advice at Consumer Credit Trade Association. His role and responsibilities include advice and guidance to members in relation to legislative and regulatory matters.

Naveed has extensive experience and knowledge in Consumer Credit. Prior to joining CCTA, Naveed worked as a Compliance Consultant/Advisor for many years at various firms, supporting portfolios of clients with legislation, FCA regulation and compliance. Naveed regularly speaks at both CCTA and industry events on matters that affect our members, and wider financial services firms.



PANELLIST

CHRIS BENNETT
Fair For You
Head of Commercial & Partnerships

Chris joined Fair for You in 2015 to support the setting up of the business, and is now leading commercial development as it transitions from start-up to scale-up.

As Head of Commercial & Partnerships, Chris is responsible for the commercial success of the business through product development and key partner management. Working directly with retailers, housing associations, local authorities, charities and more, he supports the delivery of quality and innovative solutions for customers. Chris is also Company Secretary for Fair for You and its charity owner, the Fair Credit Charity.



PANELLIST

NICOLA CRUMP
Themis Consultancy
Director & Regulatory Consultant

Having worked with and for regulated consumer credit firms since 2014, Nicola possesses an outstanding working knowledge of FCA regulatory compliance, with particular in-depth knowledge of the Consumer Credit Act, Data Protection/GDPR and the FCA Handbook (CONC, PRIN, SYSC, COND, GEN, SUP and DISP) as well as experience in managing conduct risk, outcomes testing and financial crime and SM&CR.

Nicola has a wealth of experience in building and leading compliance teams in consumer credit environments, having led and implemented various large scale regulatory and strategy change transformational projects. She has a sound understanding of the importance of stakeholder relationships, collaboration and communication to drive success.



PANELLIST

AJ DAVISON
Acquired.com
Senior Partner Manager

AJ Davison is Senior Partner Manager at Acquired.com, a UK payments specialist offering tailored processing and treasury solutions.

AJ boasts over eight years of experience in the payments industry and tech sector working for businesses including American Express and Biller. With an extensive background spanning multiple markets, including APAC and EMEA, he is an expert in developing invaluable partnerships which boost Acquired.com's market presence and expand its reach to a broader client base.

AJ has a deep understanding of the lending sector, and he's passionate about new payment technology. AJ plays an integral role in driving Acquired.com's efforts to remain at the forefront of the payments industry.



 **PANELLIST**

RACHEL FAIRHURST
Bud Financial Ltd
VP of Credit Risk & Client Success

Rachel is VP of Credit Risk and Client Success at Bud, having recently joined the data intelligence company.

Rachel started her career in credit risk in 2000 at Equifax, then spent fifteen years in various senior credit roles at a wide variety of companies ranging from MBNA and RBS to British Gas and Wonga. She has worked across products and the lending lifecycle, including loans, current accounts, high cost short term and credit cards.

Rachel re-joined Equifax in 2017, where she first became involved in developing solutions for lenders using Open Banking. She joined Credit Kudos in 2019, staying until a year after their successful exit to Apple.



 **CHAIR**

MARK FIANDER
GAIN Credit
Chief Executive

Mark is CEO of Gain Credit LLC, the company behind Lending Stream and Drafty. Having started his career in fast moving consumer goods he moved into financial services working across banking, insurance and consumer guidance.

Committed to doing the right thing for customers, Mark is a graduate of the MAT/UK Finance vulnerability academy and has spoken at the UN and G20 on driving consumer financial resilience. Mark is also Chair of CCTA.



 **PRESENTATION**

ANDREW BARTLE
Perch Group
Chief Commercial Officer

Andrew was the original founder of Lowell Financial Ltd, with over 20 years' debt purchase and industry experience. Since joining Perch Group in 2021, Andrew has been responsible for business development, data analytics and strategy.

The latest project Andrew has headed up has been the introduction of Verify, the group's brand new data and technology lead field service which has resulted in the group now being uniquely positioned to provide a full end to end collections, legal, purchase and field offering.



 **PRESENTATION**

TOM JEFFERY
Square 4
Advisory Director

Tom Jeffery is the Advisory Director (Operations & Remediation) at Square 4. He works closely with clients to ensure their operations and remediation programmes are fit for customer, regulatory and commercial purposes.

Tom has worked in Financial Services for the past 22 years and has a proven track record of leading large scale and omnichannel remediation programmes, as well as front-line operations, including deploying the latest technologies such as speech analytics in regulated environments.



 **PANELLIST**

MATT GREENWOOD
Centre for Social Justice
Head of Debt

Matthew Greenwood is the Head of Debt at the Centre for Social Justice (CSJ), an independent think tank based in Westminster.

The CSJ, in their Swimming with Sharks report, carried out the most extensive research into the extent of illegal money lending in the UK for well over a decade. It was this work that delivered an independent estimate that over a million people in England borrowed from an illegal lender.

Matthew has played an important role in taking that message out and into the public debate, speaking to the media, key stakeholders, and politicians.



 **PANELLIST**

SIMON GREGORY
Data on Demand
Sales Director

Having built a career in both the Consumer and Commercial data sectors, Simon is currently part of the Exec Team at Data On Demand where his role is focused on supporting the business to grow its Alternative UK Consumer Data services across new and existing markets with a focus on Financial Services.

Prior to Data On Demand, Simon spent seven years with Credit Reference Agency TransUnion UK (previously Callcredit) as part of the leadership team for their Alternative Lending & Fintech division.

Outside of work, Simon is an avid supporter of the treble winning Manchester City, fair weather cyclist and thoroughly average golfer.



 **PANELLIST**

ANDREW MARSH
Marsh Finance
CEO

Andrew Marsh is a renowned CEO in financial services with thirty years' experience. An accomplished and recognised industry expert, Andrew earned a spot in the prestigious credit-500 index.

Andrew's knowledge of car finance, coupled with his innovative mindset, has enabled him to lead Marsh Finance to unprecedented levels of success.



 **PANELLIST**

GUY STATTER
Qualco
Country Manager, UK & Ireland

Guy Statter worked in financial services software and consultancy for twenty years, focusing primarily on innovation and transformation within credit, collections and fraud.

He is currently Country Manager for Qualco in UK and Ireland, having held previous positions at Target Group, BAE Systems, Salesforce and Experian.



 KEYNOTE

MARTHA STOKES
Financial Conduct Authority
Head of Consumer Lending

Martha's 'Consumer Lending' department supervises firms and senior individuals involved in providing credit to consumers. Her teams work closely with regulatory partner agencies. Martha is a lawyer by background, having joined the FCA in 2010 from a leading City law firm. Martha has extensive investigation and litigation experience, and has led a range of high profile regulatory and criminal enforcement cases.

Prior to her move to Consumer Finance, Martha headed up a multi-disciplinary department in Enforcement which brought together strategically important teams delivering triage, interventions and cancellations of firms for the protection of consumers and markets, across many different sectors. Martha is an Executive Decision Maker for the FCA.



 KEYNOTE

KEVIN WRIGHT
Financial Ombudsman Service
Ombudsman Leader

Kevin is an Ombudsman Leader at the Financial Ombudsman Service, responsible for leading an area of ombudsmen and investigators in reaching fair resolutions to complaints about consumer credit.

He has worked across a number of different product areas during his seventeen years at the Service, and has developed a particular interest and expertise in the fields of affordable lending and the Service's jurisdiction to consider complaints.



 PRESENTATION

JASON WASSELL
CCTA
Chief Executive

Jason has over twenty years' experience in strategy development, risk, and communications. He has increasingly focused on risk and strategy in financial services over recent years.

He is currently Chief Executive of Consumer Credit Trade Association which represents firms that offer alternative lending products. Jason helps firms adapt to the changing regulation of consumer credit, engaging directly with the FCA on issues of policy and supervision.

Jason's previous experience includes work within financial services, energy and infrastructure development. Before coming to consumer credit, Jason was involved in planning around resilience issues including fuel shortages and pandemics.



UPCOMING ISSUE
AVAILABLE **OCTOBER 2023**

The Consumer Principle is here!

Where will the FCA look next?

A VERY BRIEF BACKGROUND

Firms will be familiar with the new Consumer Duty principle by now. Implementation (for new and existing products and services) happened on 31 July 2023.

The familiar principles of “treating customers fairly” and communicating in a way that is “clear, fair and not misleading” are disapplied (where the Consumer Principle applies) in favour of this new, higher standard.

Firms must act to deliver “good outcomes” for their retail customers. They’ll need to do this using the three cross cutting rules to interpret the four outcomes (products and services, price and value, customer understanding and customer support).

WHAT NEXT?

Implementation is only the start. The FCA has been clear that it expects a culture shift from firms. It will be actively monitoring compliance with the new Consumer Principle, with a view to prioritising the most serious breaches and “acting swiftly and assertively” where it finds evidence of harm or risk of harm to consumers.

WHERE WILL THE FOCUS BE?

The FCA’s “Ten key questions for firms to consider”, published on 28 June 2023, provides some useful insight to the FCA’s high level expectations and priorities.

Given the wider economic climate (and with 24% of UK adults either in financial difficulty or finding it a “heavy burden” to pay their bills) we expect a particular focus on (a) firms’ assessments of a customer’s financial situation and (b) how they deal with those customers who are at risk of or in financial difficulties.

CREDITWORTHINESS

The assessment of ‘affordability risk’ (being the risk of customers being unable to make their repayments under an agreement) is likely to come under more scrutiny. Firms will need to be able to demonstrate that they are taking a thorough approach to their creditworthiness assessments. In addition to the initial work already undertaken as part of the implementation of the Consumer Principle, firms should ensure they are continually assessing the effectiveness of their approach to affordability risk by (for example) monitoring

ongoing customer performance as against the original creditworthiness assessment, and making changes and improvements where they can.

The FCA has been clear that it expects a culture shift from firms. It will be actively monitoring compliance with the new Consumer Principle.

CUSTOMERS IN FINANCIAL DIFFICULTIES

We are already seeing the FCA take steps in this space, with its consultation on Strengthening Protections for Borrowers in Financial Difficulty: Consumer Credit and Mortgages. New rules are expected in H1 2024. Given the wider economic context, it is likely that this focus will continue.

Firms should look closely at their written policies, communications, and training. In particular, firms should consider just how tailored their forbearance support really is. The FCA will want to see evidence of firms (a) providing forbearance to customers at risk of payment difficulties (not just those who have missed a payment), (b) being really clear with customers about where they can go for help and support and (c) tailoring their forbearance approach to the customer’s circumstances

(which means ensuring that customer facing colleagues understand and are ready to offer a broad range of appropriate options). A “one size fits all” approach will not be good enough.

CUSTOMER COMMUNICATIONS

Many firms will already have assessed their customer communications as part of the Consumer Duty implementation process. But paying particular attention to those communications to customers in financial difficulties will be even more important. The FCA will expect this to be an ongoing process, with firms assessing, learning and improving as they go.

Firms will also need to ensure they are not inadvertently making the customer’s financial situation worse (by charging customers for arrears communications, or by allowing customer’s arrears balances to escalate).

CCA REFORM

Any thoughts on the next steps for consumer credit firms would be incomplete without a mention of the FCA’s commitment to reform. Lenders and consumer groups have been pushing for this for a long time. While there’s a lot that firms can do (and are doing) to improve things for customers, their efforts could be helped by some sensible changes to the legislation. The FCA’s commitment to improving communications will be welcomed by all in the industry, but there’s much more that can and should be done.

Leanna Bradshaw
Director, Regulatory
Walker Morris LLP



Waste not, want not

Verifying customer data under the new Consumer Duty

As someone with over 35 years' experience in collections and field services across all sectors, I know how complex customer journeys can be. Under the Financial Conduct Authority's new Consumer Duty, these journeys will need to be more streamlined than ever.

When it comes to verifying customer data and reconnecting creditors with customers they have lost touch with, there are many routes to reaching a resolution – but all too often different methodologies are not joined-up, resulting in time and resource being wasted. This has a knock-on effect on the customer in not only delaying a resolution for them but also potentially causing unnecessary added inconvenience and stress.

However, in 2023 there is a win-win solution. We now have access to the data and technology to ensure that when customer information is missing or inaccurate, it

can be gathered quickly and effectively and kept up to date to inform future activity and engagement. How we use this data is key though. This is where technology, automation, human input and expertise must work together to tailor the approach.

MORE INFORMED DECISION-MAKING, FAIRER OUTCOMES FOR ALL

Customers may be uncontactable for a whole host of reasons and these reasons may change over time. In such an ever-changing environment, it is rare we ever have a completely up to date snapshot of someone's circumstances. However, we can open up lines of communication and draw on a whole range of different sources and methods to get as clear and current a picture as possible.

Interacting with customers in arrears, whether over the phone, via email, or on the doorstep is never

straightforward but when it is up-to-the-minute intelligence-based, it will ultimately be more effective. There's no doubt about it; more informed decision making results in fairer outcomes for all involved so the more information we can gather and then verify, the better. However, if we can avoid putting too much of the onus on the customer by doing everything we can behind the scenes before reaching out to them, we can ensure that the interaction with them is about quality and not quantity.

VERIFYING DATA DURING THE DEBT LIFECYCLE

Another way that we can utilise data, technology and collaboration to improve the customer journey is by recognising that reconnecting with customers and verifying their data doesn't just need to happen at a certain point of escalation; it can take place anywhere in the 'debt lifecycle'.

This is where field services needs to move to: being part of an inter-connected, omni-channel, data-driven suite of activities rather than a standalone method as a last resort. This is exactly what attracted me to joining Perch Group, to launch our new Verify business so that we could tap into the wider capability, especially data and analytics, of

the group of companies as an end-to-end solution from pre-arrears to post-litigation/pre-enforcement.

PARTNERING WITH THE CUSTOMER

To truly streamline the customer journey we must see all forms of recoveries as a partnership with the customer. Changing the language we use, the outcomes we seek, and the targets we set so that 'Pre-Disconnection Visits' become 'Customer Verification Visits' is all part of this.

To truly streamline the customer journey, we must see all forms of recoveries as a partnership with the customer.

Adhering to the new Consumer Duty across the whole customer journey is much more than a tick box; it requires cultural change and, when it comes to things such as field activity, an almost 'revolutionary' approach. In many ways it has come at the best possible time to accelerate a direction and shift that was already happening and it should be very much welcomed.

Gary Jones
Managing Director
Perch Verify



Consumer Duty

Mission accomplished or a new way of life?

Themis Consultancy is delighted to return to another CCTA conference, continuing to build on existing relationships with the trade association and member firms. The opportunity to get together like this is vital, to share thoughts and knowledge - and to have the FCA and FOS in the same room to hear from them directly.

Naturally, the Consumer Duty remains a key focus for all attending and will likely feature significantly throughout this year's conference agenda. Since the last conference, undoubtedly CCTA member firms have been working to address the immediate challenges the Duty poses, tackling their target market analysis, product governance arrangements, fair value assessments, reviewing their highest risk customer communications and addressing their data and monitoring capabilities.

It's now almost two months since the Consumer Duty deadline of 31 July 2023 passed. Mission accomplished for most firms, right? Or wrong... Implementing the new Duty by the deadline was likely just the beginning. Every firm's plan needs to be an iterative process of continuous self-examination, learning and action. The Duty is a new way of life for all firms, and one which is here to stay.

MEASURING SUCCESS

In its policy statement (PS22/9) the FCA referenced complaints as a key metric in its measurement of

success for the Duty, with the hope that effective implementation of the Duty will lead to an eventual reduction in upheld complaints.

Additionally, PS22/9 references the Financial Lives Survey (FLS) as an FCA tool to monitor what products and services consumers use, what consumers are seeing and feeling and assess levels of trust and confidence in the market. New questions were added to the most recent FLS in May 2022, providing insights into how firms are meeting the requirements of the Duty ahead of the July deadline.

The recent FLS results exposed how much work remains to be done, with a key finding being that 7.4 million people experienced difficulties contacting at least one of their financial services providers in the period, with vulnerable customers being most likely to struggle.

CONCLUSION

Don't be complacent. We know firms are being contacted by the FCA about the Duty at the moment. Map phases 2, 3 and 4 for the Duty, ensuring continuous improvement. And if you haven't already considered the FLS, do so, not least because there are plenty of questions that firms may wish to use within their own base to inform focus.



Guy Statter
Country Manager, UK & Ireland
Qualco



QUALCO

Innovating the future of credit

We are on a mission to future-proof the financial world by harnessing the power of technology, data and industry expertise. Qualco's proven solutions empower businesses to make well-informed decisions and optimise their credit management operations, streamlining their financial processes for greater success.

Qualco stands out as a frontrunner in the industry, using AI-powered solutions to revolutionise traditional methods and streamline operations, efficiency, offering substantial benefits to global credit and financial organisations.

QUALCO 360 offers an expanding solutions ecosystem for organisations managing Non-Performing Loans (NPLs), Non-Performing Exposures (NPEs), and credit portfolios. With advanced analytics, Machine Learning, the most comprehensive collections and recoveries platform in the market, and digital engagement tools, QUALCO 360 transforms the management of NPEs and credit portfolios.

QUALCO Loan Manager is an end-to-end loan management and servicing solution. It supports creditors and loan servicing companies with powerful functionality for onboarding, disbursement, termination, and restructuring of loan portfolios.

Loan origination processes can be simplified using the QUALCO Loan Originator. It enables accessing loan applications online via multiple channels such as bank

branches, call centres, merchants, internet banking, and web portals.

Embedded in our essence are the core values that have been our driving force over the years:

- **End-to-End Solutions:** Our offering comprises a broad spectrum of technology solutions in areas that include but are not limited to credit, receivables management, and digital transformation.
- **Client Intimacy:** With high NPS scores, we put the client first and offer the best-fit solution.
- **Product Leadership:** We consistently strive to provide our clients with robust products and services. To offer the best products, we significantly invest in them while staying creative, agile, and fast.
- **Delivery and Operational Excellence:** We provide clients with reliable products and services delivered seamlessly by accessing powerful delivery resources.
- **A Strong AI Backbone:** We're investing in explainable AI to make sense of our client's data by bringing predictive insights to their operations.
- **International Footprint:** With offices across Europe, the UK and the Middle East, we serve over 100 clients in over 35 countries.



Nicola Crump
Director & Regulatory Consultant
Themis Consultancy





Simon Gregory
Sales Director
Data on Demand



A call to action, not intention

How does the saying go ... “you can lead a horse to water, but do you even know where the horse is, let alone have the ability to lead it there and make it drink” ... something like that anyway!

Consumer Duty has landed. For some, I’m sure they are now a little numb to phrases like “vulnerability” and “cost-of-living crisis”. Understandable, but also understandable that since regulators have broadly had the same asks on firms in terms of supporting vulnerable customers for the past two years, that we should start to see more action and less intention.

From a Data On Demand perspective, we created a service to help businesses better align with regulatory requirements to identify customers most in need of support. IDVU uses unique information captured directly from the consumer to quickly identify any change of circumstance, which helps firms engage at the right time. The data set is growing and includes 100+ unique vulnerability variables on over 4 million UK consumers.

Over the past 24 months we have engaged with many firms across multiple sectors to help them plan strategy

to align with regulatory requirements and identify and engage with their most vulnerable customers. I’m pleased to say we have a growing number of clients utilising IDVU.

What surprises me is the number of businesses who are still solely focused internally on making sure that when customers contact them, they have the right training and process to provide the best support they can. This is absolutely required, but it’s only half the battle and doesn’t align with the full scope of regulatory requirements, or the needs of customers.

Universally, regulators are calling for more proactive monitoring. They are asking firms not to rely on their customer asking for help, but to identify solutions and datasets which allow them to engage at the right time for the large numbers of customers who don’t know they are vulnerable, or don’t know how to ask for help.

I think it is fair to say that from the perspective of the Regulator and consumer, the time for planning has passed. Now is the time to act!

Empowering borrowers & lenders

The role of Open Banking in credit collections

From streamlined collections for lenders to increased financial control and tailored repayment options for borrowers, including open banking payments as part of a customer-centric collections strategy is paving the way for a more inclusive and secure lending ecosystem. But what are the practical applications of open banking in the credit collections process?

Most individuals in the UK currently possess more than one bank account, and therefore an individual’s funds are often distributed across multiple accounts, with no singular account holding all their assets. Consequently, the account associated with their Direct Debit (DD) or Continuous Payment Authority (CPA) set up for credit collections may not always be the account which has available funds – this is where open banking comes in.

Introducing the option to pay via open banking from a different bank account than the one linked to their CPA or DD allows borrowers to make loan repayments from an account of their choice, enabling them to manage their cash flow more effectively. This benefits both the lender and the consumer. Open banking also enables borrowers to have the flexibility to select the repayment amount within their means. In the context of Consumer

Duty, this helps safeguard the consumer’s financial well-being by allowing them to pay back only what they can afford in a given month.

Open banking payments have a much lower failure rate compared to direct debits or card payments. In fact our payment transaction data found an average acceptance rate for open banking payments of 97% compared to 70% for standard card authorisations. Open banking also relies on secure Application Programming Interfaces to initiate transactions directly between banks, eliminating the potential for manual input errors or outdated payment details. The automated nature of open banking payments significantly reduces the likelihood of payment failures, the associated inconvenience for the lender, and potential fees.

The combination of lower failure rates and instant settlement offered by open banking payments ensures that borrowers can make affordable and reliable payments, reducing the risk of missed or late payments that may negatively impact their credit score. The efficiency and speed of open banking payments contributes to a smoother and more seamless borrowing experience for borrowers and lenders alike.

AJ Davison
Senior Partner Manager
Acquired.com





Denise Crossley
Group Chief Executive Officer
Lantern

Consumer Duty

We've only just begun...

If only I had a pound for every time I've heard – "We're going to sort that after 31st July, once Consumer Duty is done". Yes, the deadline for readiness was 31st July but that's exactly what it was, readiness and not completion!

The real work started on 1st August. All that effort put into your gap analysis and building meaningful and insightful MI – now is where the work starts to review that data and see what it's telling you.

Are you delivering the right outcomes to your customers? Are your processes working as you expected them to? The data we all have available to us is our most valuable asset to allow us all to sleep at night, knowing we're doing the right thing by our customers – always.

Of course it's not just about checking that what we're doing is right – it's also checking that what we're not supposed to be doing isn't happening. As an example, we all know that once a customer is given necessary breathing space, our communications must stop – but have you built the reporting to evidence that?

We've all spent a long time showcasing the things that go well, but a real mindset shift is needed to build evidence around things that shouldn't be happening, but in fact were. It's as important to make sure we all know, and can evidence, that our processes and strategies are working as designed.

So, it's not just about what you are doing, but equally about what you are **not** doing!

To those waiting until Consumer Duty is over – just remember it won't be. This is just the beginning of a continual and iterative review cycle!

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CORE MODULES

- Introduction to the FCA & Consumer Credit
- FCA: Conflicts of Interest
- FCA: Whistleblowing
- FCA: Consumer Duty
- Regulated Complaints Handling
- Vulnerable Customers
- Bribery Act 2010
- Data Protection Act 2018
- Money Laundering
- Financial Promotion Rules
- SM&CR: Staff Conduct Rules



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WALKER MORRIS LLP

Walker Morris provides market-leading advice to consumer, motor and asset finance providers. We have one of the largest teams of talented and specialist lawyers, with experience of working both in-house and at the regulator, and advising on regulatory sensitive matters. We have experience of advising a wide range of providers: from large household names to smaller players and new entrants into the market. We advise on the full range of issues from authorisation and permissions, to regulatory process, procedures and policies, to consumer documentation (including post-contractual documents) to challenges to the very way in which you operate business (for example, enforceability challenges, documentation, responsible lending, commission structures and business procedures).

Our recent experience includes:

- providing strategic advice to motor finance providers on commission issues (including advising on their responses to the Financial Conduct Authority and the Financial Ombudsman Service, their approach to dealing with claims and complaints and potential risks);
- advising motor finance providers on prospective diesel emission claims (including advising on the basis of claims and the threatened group litigation orders);
- providing strategic advice to consumer, motor and asset finance providers on remediation plans and making notifications to the FCA because of non-compliance (including advising on projects with potential remediation of over £500m); and
- advising consumer, motor and asset finance providers on the impact of the implementation of the Consumer Duty (including advising on policies and procedures, and re-drafting documentation to ensure good outcomes).



walkermorris.co.uk



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PERCH GROUP

North West-based Perch Group is one of the fastest growing and most ambitious debt purchase, collections, litigation and reconnection firms in the UK. To keep it simple for both clients and customers, we provide a one-stop-shop of market leading, data-led services across the whole debt lifecycle through our sub-brands Perch Capital, ACI-UK, TM Legal and Verify.

We're not just a buyer that sees debt purchase as transactional. We build long-term partnerships as an extension of our clients' teams. We are able to service the full spectrum of debt types and sectors from mail order and financial services to utilities and telecoms, whatever the size, type or complexity of portfolios or accounts.

While our highly experienced leadership team has long-standing relationships, when it comes to unpicking issues, we make it our mission to get it sorted as quickly and fairly as possible. Because of our entrepreneurial culture we can make quick decisions, while our track record of regulatory compliance, award winning customer service, and digital-first solutions make us a safe pair of hands in turbulent economic times.

This unique combination of experience and agility allows clients to focus on their customer acquisition strategy and front end journeys and customers to move on, using us as a 'perch' to lean on before flying away.



perchgroup.co.uk



marco.pace@perchgroup.co.uk



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Themis Consultancy assists consumer credit firms to balance compliance, customer and commercial needs, whilst delivering good outcomes for customers. Our compliance advisory services are highly professional but moreover they are personal; tailored to suit the needs and budgets of our clients.

Nicola has unprecedented experience in fast paced, highly regulated commercial settings and as such, understands the need for practical, solutions focused regulatory advice. Themis Consultancy offers compliance and regulatory support through our retained services packages, training services, and bespoke project support, including, amongst other things, Consumer Duty support, customer outcomes testing, understanding customer vulnerability, complaints strategy assessments, Past Business Reviews (PBRs) and mock section 166 reviews.



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QUALCO offers a wide range of analytics-driven fintech solutions that enable enterprises to effectively manage their customers and assets.

With more than twenty years of proven experience, QUALCO is a leading Fintech solutions provider, enabling clients to realise value through the provision of operational platforms, data insights, digital experiences, and domain knowledge.

More specifically, our technology comprises enterprise class, highly scalable, end-to-end software solutions and allows our 90+ clients in over 35 countries to automate, streamline and standardise their operations.

Our solutions cover a wide range of needs for banking, financial services, utilities, and retail organisations. More specifically, we offer end-to-end technology solutions for non-performing loans and receivables management, data analytics and AI and loan management.



qualco.eu



gstatter@qualco.eu



PANEL SPONSOR
DATA ON DEMAND

Data On Demand provides data and insights to companies that service end customers, helping them to better understand and improve engagement with consumers. Our alternative database of unique, compliant UK consumer insights help businesses deliver better outcomes across the full customer lifecycle from onboarding and customer management through to collections and recoveries with real-time data.

Our award winning 'Fin.Trace' product supports risk decisioning, customer management and collections and recoveries. Proven to uplift customer insights and liquidation, versus traditional data sources with a focus on relevant digital contact channels including mobile and email.

Our 'ID.VU' solution supports compliance with regulatory requirements such as Consumer Duty by helping lenders identify and monitor existing and emerging signs of vulnerability and financial hardship within their customer base, monitoring life events and borrowing behaviour not covered via traditional data sources.



dataondemand.co.uk



simon.gregory@dataondemand.co.uk



DINNER SPONSOR
ACQUIRED.COM

Acquired.com has built a one-stop-shop platform for full payment life cycle management, including collections via card and open banking, faster payments and treasury solutions. Their deep data expertise and consultative approach enables businesses to accelerate their growth through customer-led payment solutions.

With market-leading technology and variety of acquiring connections, Acquired.com digitise and streamline payments, tailoring their solutions to perfectly align with the individual needs of each customer.

They pride themselves on their advisory approach, providing best in class service with a view to resolving complex challenges.

Acquired.com are an FCA regulated business, an EMD Agent and a licensed Payment Initiation Service Provider.



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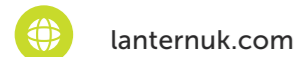


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Lantern is the industry leading debt purchaser of consumer accounts, with a specialist focus on managing both vulnerable customers and those in financial difficulties.

We operate at the very highest level of corporate governance and interpretation of regulatory requirements. Our approach is tailored to customers individual needs, discussing their situation with empathy, honesty and above all, humanity.

Our exceptional approach is independently evidenced and recognised through our consistent achievement of GOLD standard accreditation from Investor In Customers (IIC) and Investors in People (IIP).



lanternuk.com



sam.barnard@lanternuk.com



EXHIBITOR & SPEAKER SQUARE 4

Square 4 was founded with the vision to support businesses to grow and thrive across the evolving spectrum of conduct, financial crime and operational risk.

We leverage our expertise to design tailored solutions across our core service lines; Advisory, Resourcing, Recruitment and Learning and Development. Success for us is simple – to provide an unrivalled level of service and expertise by designing bespoke solutions across a diverse and challenging regulatory agenda.

We build relationships for the long term as a trusted and capable partner, as we aim to be your first point of contact for all advisory and resourcing needs.



square4.com



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EXHIBITOR ARYZA

Aryza is a pioneering technology company. We work with our customers and partners to create and deliver solutions that improve the financial health and lives of the millions of people that engage with our products every day. Our mission is to transform the financial relationship businesses have with their customers.

Focused on the credit, debt recovery and insolvency sectors, Aryza's solutions automate a wide range of activities including loan origination and management, data collection and affordability assessment, administration, recovery, and payment processing, covering every stage of the credit cycle.

Aryza's solutions are underpinned by unrivalled expertise and powerful data. Since its foundation in 2002, the business has grown rapidly. Today it has global operations across four continents.



aryza.com



EXHIBITOR ARMALYTIX

Armalytix are making it simple for consumer credit firms to spot the customers who are vulnerable to harm.

Armalytix is a data intelligence firm that allows consumers to safely share open banking and other data to deliver financial insights to firms, helping those firms comply with their Consumer Duty obligation with faster and more effective affordability and creditworthiness checks.



armalytix.com/industries/financial-services/



EXHIBITOR CFH DOCMAIL

For more than 40 years, CFH Docmail have taken the practical approach to communications, developing technology to support the changing way we all share information.

Today, we are an accredited, trusted leader for communications on every channel. Print, online, mail – wherever you need to be, we'll get you there quickly, effectively and impactfully. This enables you to communicate with confidence, create meaningful connections and improve business outcomes.

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Whether it's specialist financial and regulatory legal advice, or helping you with the day-to-day legalities of running your business, our specialist lawyers are there to protect your interests and make sure you get the return you want.



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Perch Capital is a well funded, entrepreneurial and agile debt purchaser that combines data, expertise and advanced analytics to segment and price portfolios. Our customers are assessed with our own unique behavioural and credit analytical tools to ensure we take a customer centric approach and provide the appropriate customer journey.

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ACI-UK is an FCA regulated debt resolution agency, which engages with its clients customers in order to help them resolve the balances on their account and take positive steps on their path to financial wellbeing.

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TM Legal Services is an SRA regulated firm of solicitors, who commence litigation activity on behalf of its clients. TM Legal Services enforce debts with particular specialism in Civil Litigation and the Consumer Credit Act 1974.

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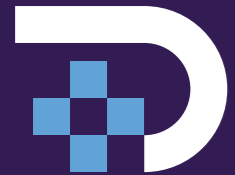
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We aim to give each one of them a genuinely personalised service and then we invite them to rate us on Trustpilot (where they give us scores you really wouldn't expect a debt collector to receive).

Yet another reason why lenders choose Lantern.

Source: Trustpilot, August 2023

For more information:

Call us on **07816 531 373** or email **sam.barnard@lanternuk.com**



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aryza

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Automation of loan origination and management

Onboarding

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Recovery

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Building stronger relationships with customers

Creditor Services

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For more information please email us at **hello@aryza.com** or visit our website **www.aryza.com**. Alternatively contact us on **0800 072 0092**.



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For many years, we have been supporting CCTA members meet their objectives.

From reducing the conversion time for new loans to ensuring regular payments are made and improving awareness of your products and services. CFH take the complexity out of communications and offer an elite package of products and services to provide secure, cost effective and impactful solutions on every channel.



GET IN TOUCH

To find out more, why not stop by our stand!
Alternatively, you can get in touch with:

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Shelley Hawkins

Email: shelley.hawkins@cfh.com • **Tel:** 07850 099660



SQUARE 4 PARTNERS

Square 4 was founded with the vision to support businesses to grow and thrive across the evolving spectrum of conduct, financial crime and operational risk. We are an advisory and resourcing business that leverages our extensive expertise to design bespoke solutions across our core service lines of:

- Advisory
- Resourcing
- Recruitment
- Learning & Development

Success for us is simple – to provide an unrivalled level of service and expertise by designing bespoke solutions across a diverse and challenging regulatory agenda.

We build relationships for the long term as a trusted and capable partner. We aim to be your first point of contact for all advisory and resourcing needs.

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