

ccta

MAGAZINE



NOV
2025

issue features

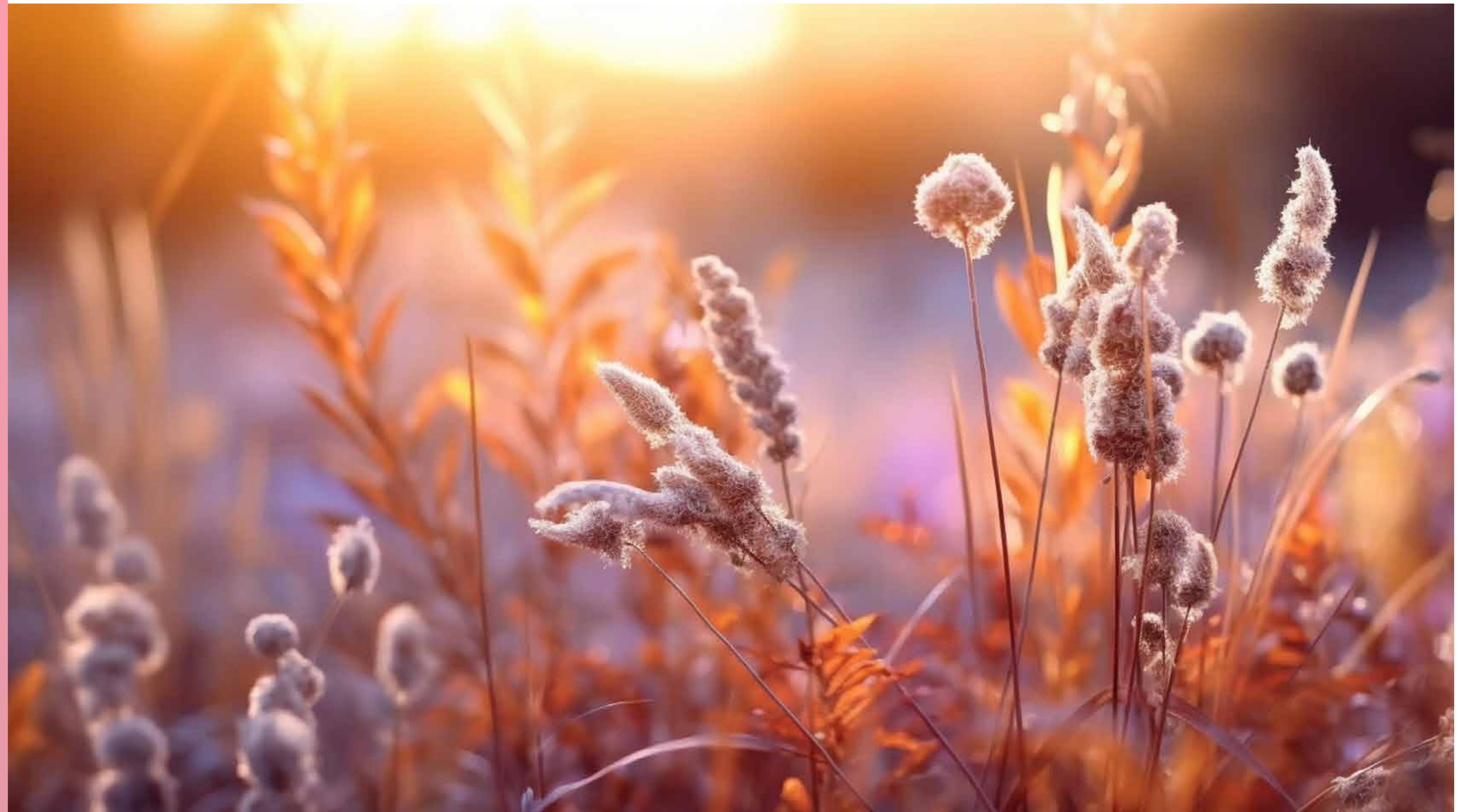
2025 Annual Conference
Equifax
CCTA

legal latest

Addleshaw Goddard
Grant Thornton
Walker Morris

member articles

Lantern Group • Acquired.com • Aryza
Lenvi • Transunion • Redporth
Square 4 • LexisNexis



in this issue

regulation in motion

What the motor finance redress scheme tells us about the wider direction of travel

p4

a raft of changes

Consumer credit rules in 2026

p8

10

building connections, gaining momentum

My first year as CCTA Membership Manager

12

ccta 2025 annual conference

A day of insight, innovation, and industry collaboration

06

CATO unlocked

The data revolution driving fairer lending

regulars

- 03 editor's latest
- 14 legal latest
- 20 your ccta
- 21 member news
- 24 member articles
- 33 the directory

contacts

Jason Wassell | Chief Executive
jason.wassell@ccta.co.uk

Lucy Donovan | Head of Strategy & Comms
lucy.donovan@ccta.co.uk

Naveed Asif | Head of Policy & Advice
naveed.asif@ccta.co.uk

Phill Harland | Head of Brand & Operations
phill.harland@ccta.co.uk

Sarah Garratt | Membership Manager
sarah.garratt@ccta.co.uk



Lucy Donovan
Head of Strategy & Communications
CCTA

industry events

**20
NOV**

Credit & Collections Conference
Credit Connect
Manchester
[MORE INFO +](#)

**25
NOV**

CCTA Workshop: Responsible Lending
CCTA
Online
[MORE INFO +](#)

**26
NOV**

Lending Awards
Credit Strategy
London
[MORE INFO +](#)

**02
DEC**

CCTA Roundtable: Motor Finance
CCTA
Online
[MORE INFO +](#)

**11
DEC**

CCTA Summit: Winter 2025
CCTA
Online
[MORE INFO +](#)

editor's letter

Welcome to the final edition of CCTA Magazine for 2025. It's hard to believe we're already approaching the end of another year – one that has been especially active for the sector.

Unsurprisingly, the ongoing consultation on the proposed motor finance redress scheme features prominently throughout this edition. Our CEO, Jason Wassell, shares insights on why the wider sector should be paying close attention, exploring both the potential impacts and lessons for future redress programmes. You'll also find contributions from several associate members offering their perspectives on how lenders can best prepare for what lies ahead.

This issue also follows our Annual Conference, held in late September. I hope those who attended found it valuable and informative. As always, it was fantastic to see such strong support from our members. For anyone unable to join us, we've included a summary of the key discussions and takeaways from the day.

We're delighted to feature contributions from many of our sponsors, including our headline partners Walker Morris and Square 4, as well as Equifax, one of our newest members, who also took part. You'll also find our regular legal updates and a variety of articles showcasing insights and expertise from across the CCTA membership.

I hope you enjoy this edition and find plenty to reflect on as we move into 2026. Wishing you a Merry Christmas and a successful year ahead.



ISSUE FEATURES

Hot topic features written from a variety of industry experts, many of which are exclusive to CCTA Magazine.



REGULATORY INFORMATION

Updates from regulatory bodies are detailed in the latest issue of CCTA Inform, a member exclusive publication.



LEGAL LATEST

A range of legal experts give their views on recent cases that have made waves in the court room.



STAKEHOLDER VIEWS

We cover all the bases with articles from the wider industry. No stone is left unturned in the search for news.



YOUR CCTA

A snapshot of recent activity from your trade association of choice. Find out what's on the horizon here first.



MEMBER ARTICLES

A range of informative articles penned by our members. See what the experts have to say.



MEMBER NEWS

Reached a milestone or hit a target? Share your news with our members at magazine@ccta.co.uk.



ASSOCIATE DIRECTORY

Browse our associate directory to find the professional help you've been looking for.

regulation in motion

What the motor finance redress scheme tells us about the wider direction of travel

A sector-wide movement

This edition of CCTA Magazine focuses on motor finance. If you have read about the scope of the forthcoming redress scheme, you might understand why. But even if you are not in motor finance, I think it is valuable to stop and look at what is happening.

The Financial Conduct Authority's (FCA) proposed motor finance redress scheme is one of the most significant interventions in consumer credit for more than a decade.

Although focused on historic car finance agreements, the consultation signals something broader - how the FCA now expects firms to evidence fairness, manage complaints and deliver redress at scale. It's a development that matters across all lending sectors.

Scale and scope

Think about what it would be like if the FCA said that you needed to find and contact every customer

from the last 18 years. That in itself might be a daunting task, that is, before we even get into redress calculations for that period.

The consultation follows the Johnson Supreme Court ruling, which confirmed that undisclosed, high commissions and exclusive broker arrangements could make a lending relationship *"unfair"*.

The FCA estimates that 14.2 million agreements (around 44% of all written since 2007) may be affected. If 85% of eligible customers participate, they believe the total redress could reach £8.2 billion, with another £2.8 billion in implementation costs.

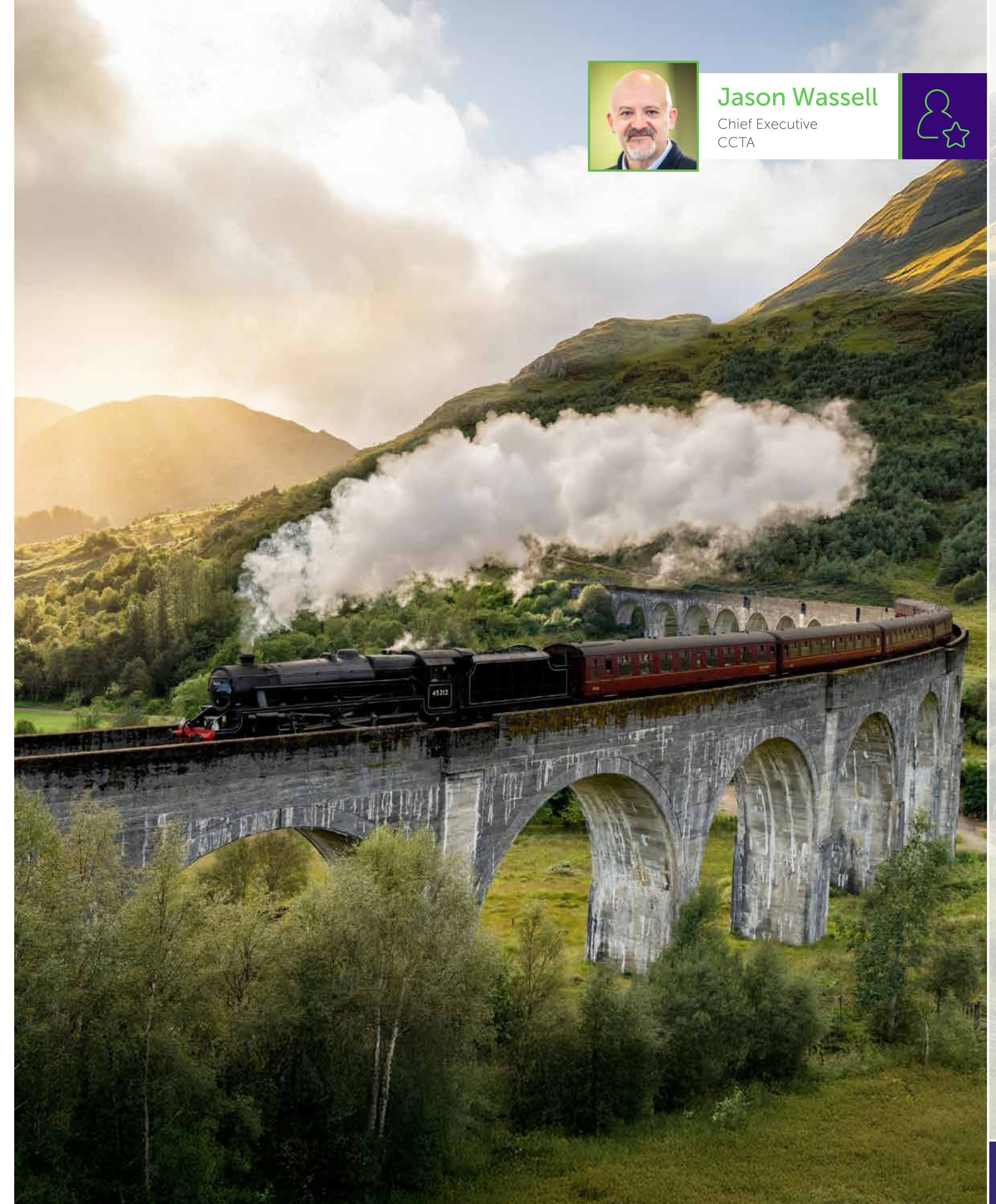
Most liabilities rest with large banks and lenders linked to the car makers, but the operational and compliance requirements will affect almost every market participant.

Smaller specialist lenders

Many independent and specialist lenders found themselves drawn into a review that started with



Jason Wassell
Chief Executive
CCTA



The CCTA continues to argue for proportionality and practicality at every stage of implementation.

the use of discretionary commission arrangements. However, this redress scheme will look at every agreement that had a commission payment.

So lenders will need to review data, trace customers and show fairness. The FCA's own figures show that independent lenders account for only about 2% of total liabilities, yet they remain within scope.

This raises a familiar challenge: rules designed for large institutions often land hardest on smaller firms serving regional or non-prime markets. The CCTA continues to argue for proportionality and practicality at every stage of implementation.

Broader signals for all credit sectors

Even if your business has no link to motor finance, this consultation is worth following.

The FCA is moving towards managed, regulator-led redress rather than leaving consumers to the courts or the Financial Ombudsman Service (FOS).

Interestingly, the FCA has recognised that it is not in anyone's interest to push mass complaints through the FOS process. There are additional case fee costs, the costs of working through a FOS investigation, as well as a risk of differing decisions.

However, that is where we face an interesting challenge: keeping people in the scheme, through effective communication, so they don't go to FOS while keeping operational costs manageable.

The scheme introduces a presumption of non-disclosure if records are missing - firms must prove fairness, not the other way round. The regulatory experts among you will point out that this is how unfair relationships are handled in the Consumer Credit Act.

However, for many firms, the concern is that this burden becomes even more difficult as we look further back in time. Proving a fair relationship spanning nearly two decades is a challenge when data is properly deleted.

We are aware that if successful, this will become the template for future industry-wide schemes. That means it is essential that the approach is considered and properly debated.

What happens next

The consultation now closes on 12 December 2025, with final rules expected early next year. Payments to customers could begin later in 2026.

The CCTA will submit a detailed response focusing on proportionality, data practicality and the potential costs of Ombudsman case fees. We will continue discussions with the FCA and the FOS to ensure smaller lenders can meet expectations without a disproportionate burden.

If you have any thoughts or comments, then please do get in contact with us.

In summary

1.

The FCA expects to recover just over £8 billion in redress from motor finance firms.

2.

The operational costs to deliver are going to be nearly £3 billion.

3.

Independent lenders form a small share of the redress exposure but face similar obligations.

4.

The FCA is seeking to avoid using the FOS route for mass claims.

5.

The scheme shows how future redress exercises may operate.

6.

Strong records and clear disclosure remain the best defence - often well beyond what you might expect under GDPR.



Andrea Cox
Affordability Director
Equifax



CATO unlocked:

The data revolution driving fairer lending

In an era defined by economic shifts and heightened regulatory scrutiny, the UK lending landscape has undergone a dramatic transformation over the last two decades.

From the Credit Crunch in 2007 to the introduction of the FCA in 2013 and the subsequent rollout of the CONC sourcebook and creditworthiness rules, the focus has consistently sharpened on responsible lending and tackling consumer indebtedness.

This evolution has been further accelerated by the COVID-19 pandemic and the cost-of-living crisis, which have amplified the need for lenders to truly understand a consumer's financial reality.

In this complex environment, the ability to accurately measure a consumer's affordability, the capacity to comfortably repay credit or a loan, is not just a regulatory necessity (reinforced by the 2023 Consumer Duty), but the cornerstone of sustainable business growth.

As mortgage payments increase and more people rely on credit cards, having a comprehensive view of income and expenditure is non-negotiable.



The enhanced data revolution driving financial inclusion

The ability to evidence a consumer's income is a key part in any affordability assessment. Many lenders rely on Current Account Turnover (CATO) data to verify a consumer's declared income.

A significant, industry-led change to consumer CATO membership, effective from March 2025, has fundamentally changed access to this vital data. This change ensures more FCA-authorised organisations can access a full suite of enhanced CATO data insights, which were previously only available to CATO providers.

This provides a significant uplift in the quality of data available to a wide range of organisations, including:

- credit card companies
- banks that do not have current accounts products
- retail credit providers
- telco and auto finance providers

For these organisations, the benefit is immediate: access to more data to improve affordability risk decisions.

The benefits: Granularity, inclusion, and confidence

The key innovation of the enhanced CATO data is the shift from a simple Red/Amber/Green (RAG) verification flag to providing more granular metrics that solve critical lending challenges:

1. CATO income estimate

Where a customer's declared income cannot be verified, an actual income estimate can be provided under certain conditions. For new credit applications, this estimate can be provided if it is less than or equal to 110% of the customer declared income.

2. Income Verification Index & income confidence

These are powerful tools and provide more granularity than the old RAG flags. They help determine if a consumer's current account has sufficient, consistent, and stable CATO to support the income declared.

3. Enhanced CATO insights

This provides clear evidence of income for an independent view of income separate from declared income, alongside Income Confidence (which measures the number of months CATO meets a defined percentage of declared income).

This allows lenders to move away from binary decisions. Instead of declining an applicant due to a low-level RAG status, lenders have the confidence to approve those managing their finances responsibly, thereby driving genuine financial inclusion.

Key areas: Data, expertise, and technology

Affordability orchestration is a key area of focus for Equifax. We recognise that a combination of different data sources are necessary to serve all major consumer groups and drive better customer experiences.

Equifax supports clients through three pillars:

• Data

Our rich depth and breadth of consumer data helps lenders optimise new lending, identify growth opportunities, and proactively manage at-risk consumers. The Equifax Affordability Suite combines the best of bureau, open banking, and modelled expenditure data to help organisations derive an accurate net disposable income.

• Consultancy

Consultants, like me, help organisations understand their consumers, ensuring they gain access to the right products and services and create a positive customer outcome.

• Technology

New technology, including our cloud migration, enhances stability and availability, ensuring "always-on" access to data. This commitment to technology ensures quick deployment of new data, allowing us to deliver innovative solutions that meet evolving market needs.

With these enhanced insights, we are enabling the next generation of responsible lending, where decisions are not just compliant, but also faster, fairer, and built on the foundation of confidence.





Lucy Donovan

Head of Strategy & Communications
CCTA



Next year will mark a landmark moment for the UK consumer credit market.

Regulators and Government are moving ahead with a package of reforms that will reshape how credit products are designed, marketed, and managed - as well as how lenders communicate with consumers. Many of these changes are already in motion and will reach key implementation stages in 2026.

Deferred payment credit moves into FCA regulation

The headline reform is clear: From 15 July 2026, many forms of deferred payment credit (previously known as Buy-Now, Pay-Later or BNPL) will come fully under the Financial Conduct Authority's (FCA) regulatory regime.

a raft of changes **Consumer credit rules in 2026**

Under the new framework, short-term, interest-free instalment plans offered at the checkout will be treated as regulated credit agreements. This will bring with it the full suite of regulatory expectations, from clearer pre-contract information and affordability assessments to access to the Financial Ombudsman Service (FOS).

For consumers, this should mean stronger rights and fairer outcomes - such as easier redress where goods are faulty or where disputes arise. For providers, it represents a significant compliance uplift, as systems, controls, and disclosures will all need to align with the FCA's standards.

The reform responds to the rapid expansion of BNPL over recent years, alongside concerns that some consumers were accumulating unaffordable debt outside of the protections afforded to regulated credit cards or loans. The FCA's intervention seeks to close this protection gap and promote consistency across credit markets.

Consumer Credit Act reform: A two-phase overhaul

The Government is moving ahead with the modernisation of the Consumer Credit Act 1974 (CCA) - a complex and foundational piece of legislation that underpins our regulatory framework.

Phase 1 of reform, published as a consultation in May 2025, focuses on updating information requirements, sanctions, and criminal offences, signalling a move toward simplification and greater alignment with the FCA's rulebook.

The reform responds to the rapid expansion of BNPL over recent years.

Phase 2, expected in early 2026, will take on the more substantive task of recasting consumer remedies and protections. This could reshape how statutory rights operate across products such as hire purchase, motor finance, and credit cards.

Given that the CCA forms the legal basis for Section 75 protections and other key consumer rights, the implications of transferring these powers into FCA rules will be closely watched by lenders, merchants, and consumer groups alike. It will be critical to ensure that small and specialist lenders have clarity on their obligations and that the transition does not create uncertainty or inconsistency in the market.

The Consumer Duty & supervisory focus

The Consumer Duty will continue to anchor the FCA's supervisory agenda into 2026. The regulator has already confirmed further thematic reviews, updated guidance, and targeted communications for the year ahead.

The FCA is also expected to tighten its focus on how firms identify and support vulnerable customers, ensuring that the Duty's principles translate into tangible results.

Practical impacts for BNPL firms

For firms, the immediate priorities are already emerging. Contract terms, onboarding processes, and compliance frameworks for deferred payment credit will need to be revised well in advance of the July 2026 deadline.

Lenders must also prepare for stricter affordability checks, enhanced disclosure requirements, and more robust complaint-handling systems.

For consumers, the reforms should deliver clearer information, fairer treatment, and stronger redress routes. However, as firms adapt, there may be a period of adjustment where product terms, processes, and customer journeys evolve to meet the new standards.

Both the Government and FCA have indicated they will pursue staged implementation and ongoing

engagement with industry to manage the transition effectively.

Looking beyond 2026

Even once these milestones are reached, reform of the UK consumer credit landscape will remain a work in progress. The CCA review could extend over several years, while the Consumer Duty continues to evolve as the central benchmark for good practice.

2026 will therefore be both a turning point and a starting point - the year that deferred payment credit becomes mainstream regulated credit, and the beginning of a broader modernisation of how consumer credit operates in the UK.

“

The CCA review could extend over several years, while the Consumer Duty continues to evolve as the central benchmark for good practice.

”

building connections, gaining momentum

My first year as CCTA Membership Manager



Sarah Garratt
Membership Manager
CCTA



When I joined the CCTA as Membership Manager, I knew I was stepping into a community with a proud history and an important role in supporting our industry.

What I didn't realise then was just how quickly I would come to feel part of something bigger, a network of people who are passionate about collaboration, learning, and making a difference.



My first year has been about building connections, listening to members, and finding new ways to strengthen engagement. It has been a year of ideas, data, and plenty of conversations, but most of all, it has been about people.

Creating the CCTA Member Health Check

One of the first projects I developed was the CCTA Member Health Check. I wanted a clear and consistent way to understand how each member was engaging with us, not just at renewal time but throughout the year. The Health Check considers when a member joined, whether their main contact details are current, and how actively they are interacting with our communications and events.

It highlights potential triggers, for example, if open rates are dropping or if a contact has not been in touch for a while, so we can reach out before disengagement sets in.

It is not about numbers for the sake of numbers; it is about relationships. The Health Check helps me see where a friendly message or extra support might be useful. Sometimes it is as simple as reminding a member about an upcoming event or sharing a new resource that could help. Other times, it is about reconnecting with someone who has been too busy to make the most of what is available.

Month by month, this approach is giving us clearer insight into the member journey, and it is

already making a difference. Engagement is more consistent, feedback is more informed, and we are spotting opportunities to add value earlier on.

Welcoming new members

One of my favourite parts of the role is welcoming each new member to the association. Every introduction feels like a chance to showcase everything the CCTA stands for: a supportive network, practical resources, and a genuine sense of belonging.

I have worked to make the onboarding process more personal. Every new member receives a tailored welcome email with links to key services,

upcoming events, and information on how to get started with CCTA Academy if they wish to join. It is a small gesture, but it helps each member feel part of the community from the very beginning.

It is also about helping the member find their place within the association. Whether joining from a large organisation or a small startup, I want every member to feel that their voice matters and that the CCTA is here to support them as they grow and succeed.

CCTA Academy: Supporting growth

CCTA Academy has become a huge part of how we support our members, and I have loved being involved with it this year. CCTA Academy offers structured learning pathways, expert led training, and a wide range of resources to help members stay informed and compliant in an ever-changing regulatory environment.

My role involves enrolling each new member, sending welcome details, and helping them find the training that suits their goals. Beyond that, I have been inspired by how members use CCTA Academy to upskill teams, increase confidence, and share knowledge across their organisations.

It has been rewarding to see people not only complete training but engage with the wider CCTA community afterwards. The platform has become a bridge, connecting learning with real professional development, turning education into action.

Supporting members one to one

A big part of my day-to-day work involves direct contact with members. I regularly email and speak with individual firms to offer help, answer questions, and provide support tailored to their needs.

Sometimes that means clarifying membership details or helping them make the most of the benefits available. Other times, it involves listening to their challenges and connecting them with the right CCTA resources or people who can assist further. These one-to-one interactions are some of the most rewarding parts of my role. They allow me to build genuine relationships and ensure that each member feels valued and supported.

Through these conversations, I have learned just how diverse and dynamic our members are. Every organisation has a unique story, and it is a privilege to be part of that journey.

Looking back and looking forward

As I look back on my first year, I am proud of what has been achieved: introducing the Health Check, supporting the growth of CCTA Academy, welcoming new members, and strengthening engagement across the association.

Reflecting on the year, what stands out most is the progress we have made together and the enthusiasm in shaping the CCTA community.

Ideas, feedback, and a willingness to collaborate have been key to everything we've accomplished.

Looking ahead, I am excited to keep building on this foundation. I plan to refine the Health Check to offer deeper insights, expand Academy participation, and create new opportunities for members to connect, learn, and collaborate.

The credit industry is evolving quickly, and so are the needs of our members. My goal is to make sure that every CCTA member, whether they have just joined or been with us for many years, feels valued, supported, and confident about the future.

It has been a busy and inspiring first year, and I cannot wait to see what the next one brings.



Reflecting on the year, what stands out most is the progress we have made together and the enthusiasm in shaping the CCTA community.





CCTA 2025 Annual Conference:

A day of insight, innovation, and industry collaboration



Lucy Donovan

Head of Strategy & Communications
CCTA



The 2025 CCTA Annual Conference brought together leaders from across the consumer credit sector for a dynamic day of discussion, learning, and forward-thinking collaboration.

Held in Manchester, the event showcased the industry's response to regulatory change, technological advancement, and the evolving needs of consumers.

Setting the stage: Opening remarks and strategic vision

The day began with a welcome from Jason Wassell, Chief Executive of the CCTA, who provided a thoughtful overview of the association's recent activities and strategic direction. His opening remarks emphasised the importance of adaptability and innovation in a rapidly shifting regulatory landscape.

Following this, Nicola Crump of Square 4 delivered a compelling session on the role of artificial intelligence in outcomes testing. She demonstrated how AI can support firms in meeting the FCA's Consumer Duty requirements by automating customer outcome assessments, offering both efficiency and improved compliance.

Collaboration and clarity: Enhancing customer outcomes

One of the standout sessions featured Asif Nadeem (Evlo) and Sara Dias-Foster (StepChange), who shared their collaborative model for improving customer outcomes. Their joint approach illustrated how partnerships between lenders and charities can deliver holistic support to vulnerable consumers.

Mike Ellicock then introduced the Plain Numbers method, a data-driven approach to improving numeracy communication. His presentation revealed that simplifying numerical information can double customer understanding - an insight with powerful implications for financial services.



Naveed Asif followed with an update on CCTA Academy, highlighting its expansion and accessibility. Now open to non-members, the Academy offers a growing suite of online training modules designed to upskill professionals across the sector.

Regulatory deep dive: **FCA strategy and legislative reform**

The mid-morning sessions turned to regulation, with Mark Burns from the FCA outlining the regulator's strategic priorities for the consumer credit market. His talk emphasised transparency, fairness, and the importance of data in shaping policy.

A robust panel discussion followed, tackling key regulatory issues including reforms to the Consumer Credit Act, the role of the Financial Ombudsman Service (FOS), and the implications of the motor finance commission review. The panel provided a balanced mix of legal insight and practical guidance, helping attendees navigate complex changes on the horizon.

Afternoon insights: **Data, innovation and policy**

Before lunch, Andrea Cox of Equifax explored the power of CATO (Current Account Turnover) data in lending decisions. Her session demonstrated how granular financial data can enhance affordability assessments and reduce risk.

Rebecca Denham from HM Treasury then provided a policy update, covering financial inclusion initiatives, Buy-now Pay-later regulation, and upcoming legislative changes. Her insights underscored the government's commitment to balancing innovation with consumer protection.

A lively technology and innovation panel followed, featuring leaders from Aryza, LexisNexis, and coeo UK. The discussion centered on AI, data-driven lending, and the ethical use of technology in credit decisions. Panellists shared real-world applications and debated the future of automation in the industry.

Legal landscape: **Payment innovation**

Russell Kelsall of Walker Morris delivered a timely analysis of the Supreme Court's decision in the Johnson case and its implications for compliance and redress. His legal expertise helped attendees understand the broader impact on motor finance and regulatory enforcement.

Lawrence Byers (Acquired.com) and Rachael Magowan (Moneyline) then introduced Variable Recurring Payments (VRPs), a new frontier in payment technology. They highlighted how VRPs offer greater flexibility and control for consumers, especially in budgeting and debt repayment.

Closing remarks: **Redress and reform**

The final session featured Charlotte Wilson from the FOS, who shared updates on modernising the redress system. She discussed proposed reforms to

compensation structures and the FOS's efforts to streamline dispute resolution.

The 2025 CCTA Annual Conference offered attendees a blend of regulatory insight, technological innovation, and collaborative spirit. From AI-driven compliance tools to legislative reform and payment evolution, the event reflected a sector that is not only responding to change - but actively shaping it.

As the consumer credit industry continues to evolve, this year's conference reaffirmed its role as a catalyst for progress and a champion of better outcomes for consumers and firms alike.

If you are keen to be involved in our 2026 event please get in touch.



click here for more
conference photography



a good day to bury bad news?

The FCA's motor finance redress scheme consultation

So we finally have it. The FCA published its consultation, CP25/27, on its proposed motor redress scheme on 7 October 2025.

All 360 pages of it.

But there's more: the FCA also published a [press release](#) and a [statement to the market](#).

And in the CP, there's even more:

- a ['diagnostic report'](#) covering 81 pages
- a ['Technical Annex 1'](#) covering 153 pages
- a ['Technical Annex 2'](#) covering 39 pages
- a ['Technical Annex 3'](#) covering 26 pages.

So that's nearly 600 pages on a scheme the FCA says will be *"simple for people to use and lenders to implement"*. The old saying of a 'good day to bury bad news' might be more appropriate.

So what might a firm think after an initial read? As Sir Chris Whitty once said during a COVID press release: *"there are several things we don't know; but all the things we do know are bad"*.

But after a second, or even a third, read of the documents the view is probably more nuanced and depends on a lender's position. If you're a lender who has a lot of documents and data, and only did fixed commissions which don't satisfy the definition of a 'high commission arrangement' (and didn't have any ties), then you're probably fairly happy.

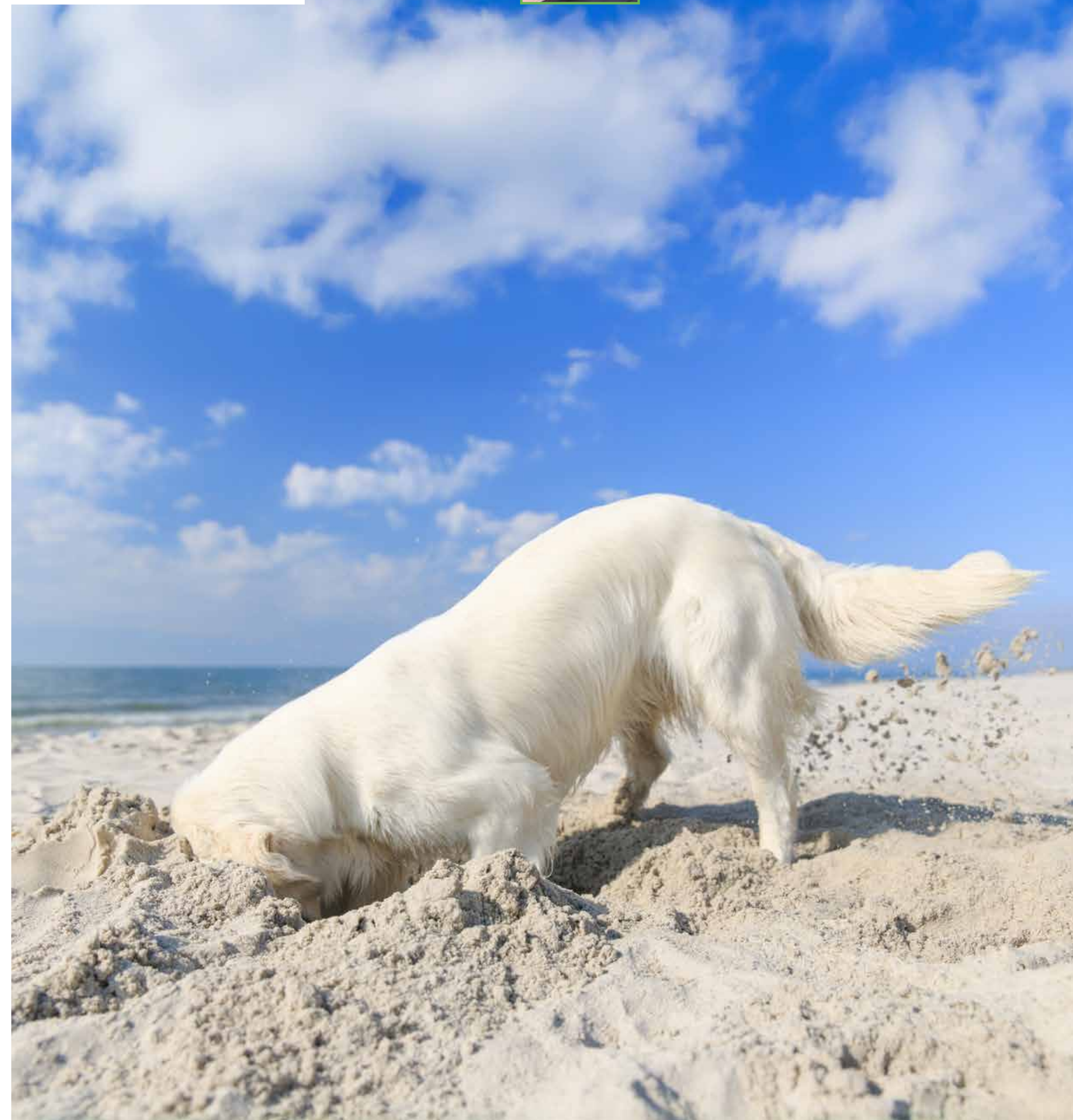
But if you did a mix of discretionary and fixed commissions, and had ties, you're probably thinking of your options. As James Bond said to Blofeld in Spectre: *"Well, it's all a matter of perspective"*.

WALKER
MORRIS



Russell Kelsall

Partner, Head of Consumer & Motor Finance
Walker Morris



What does the consultation actually propose? Here are our nine key points:

1. The nature of the scheme

A consumer redress scheme under Section 404 of the Financial Services and Markets Act 2000.

2. Scope

It applies to all regulated credit agreements entered into from 6 April 2007 and before 1 November 2024 which wholly or mainly financed a vehicle (but not consumers who have already been compensated).

3. Opt in or opt out

It depends on whether there's already a complaint (included unless they opt out) but other consumers will need to opt in.

4. Unfairness approach

There will be a presumed unfair relationship where (subject to some 'rebuttals') if a customer did not know (a) there was a discretionary commission arrangement, (b) the commission was 'high' (ie 35% of the total charge for credit and 10% of the amount of credit) or (c) there was a contractual arrangement of tie giving exclusive or near exclusive rights to lenders to provide credit.

5. Interest

Annual average Bank of England base rate plus 1%.

6. Rebuttals to unfairness

If (a) there's adequate disclosure (including both fact and nature of commission), (b) (for DCA) the broker selected the lowest rate or (c) the consumer was "sufficiently sophisticated".

7. Compensation

Refund of the commission in "rare" cases where there's (a) a contractual tie and (b) the commission is at least 50% of the total charge for credit and 22.5% of the amount of credit. For everyone else, generally an award of the average of the FCA's estimate of what they have overpaid, or lost. For non-DCA, can be some rebuttals.

8. Ombudsman

Can look at compliance with scheme's rules; will also deal with existing complaints.

9. Court

Consumers can choose not to take part in the scheme and, instead, go to the Court.

Potential challenges

Whether all or some of the following challenges within the scheme apply will depend on a lender's situation. But some of the key challenges are:

- **The scope of the scheme:** Section 404(1) of FSMA sets out when a scheme can be made. It can only relate to activities regulated under FSMA. But before 1 April 2014, the entering into a regulated credit agreement was not regulated under FSMA. It was a licensable activity under the Consumer Credit Act 1974 (the CCA). The FCA's proposals set a dangerous precedent of the FCA intervening in products before they regulated them.
- **The approach to unfairness:** There's a presumption of unfairness if one of the three factors apply. But that's not how the Supreme Court approached fairness: it decided it is "highly fact-specific" and even the FCA submitted that the Court should consider different factors. What may be fair in one relationship could be unfair in another. But the scheme overlooks this.
- **The absence of any real harm:** The scheme has very limited rebuttals. So, if a relationship is presumed unfair, it's likely that a consumer will get redress. But this is also inconsistent with the Court's approach to unfairness: the Court will do the minimum necessary to redress the unfairness and will avoid a windfall to the customer.
- **The approach to limitation:** The scheme effectively proposes to make it very difficult to time-bar any complaints. Such an approach is not consistent with how the Court has applied Section 32 of the Limitation Act 1980 (dealing with deliberate concealment) both before and after the Supreme Court's decision. The FCA

relies on Potter but such a decision involved non-disclosure of commission (rather than inadequate disclosure).

So what do lenders do next?

Eisenhower famously said: "Plans are worthless, but planning is everything". We entirely agree. Plan to get on top of the consultation so you can understand the key issues for your firm, plan for the different eventualities and plan to lobby (both directly and through trade associations).



enhancing customer journey through digitisation:

Opportunities and challenges



Michelle Brewins

Compliance Director
Addleshaw Goddard



In recent years, along with other sectors the financial services industry has been highlighting the significant benefits from the usage of artificial intelligence (AI). Some of the largest perceived benefits include combatting fraud, customer engagement and services, and customer care. Similarly, apps and digital platforms have changed customer journeys.

On 31 July 2025, the Financial Conduct Authority (FCA) published findings of its review of consumer credit customers' online journeys. The increasing use of technology has affected how customers engage with firms, apply for products and borrow money. The purpose of the FCA's research is to understand how firms acquire customers through digital channels and ensure that they are delivering good customer outcomes, in line with the Consumer Duty.

The review identified that the design of digital platforms can encourage customers in a specific direction and influence their understanding of products and features. As such, design can support good consumer outcomes. However, customers

may also be driven towards quick decisions which may not be in their best interests or consistent with the Consumer Duty.

The review focused on specific categories such as design aspects, different customer groups, testing and quality assurance, and management information and oversight. Below we discuss some of the key findings and considerations for firms to improve their online customer journeys.

Design aspects

Firms often neglect target customer needs, fail to support vulnerable individuals, and make it hard to disclose vulnerabilities. Poor design can lead

to rushed decisions, biased nudges, and unclear product information. Marketing focused on speed may mislead customers and harm outcomes. Key product details, such as fees and features, are sometimes not clearly presented, limiting customer understanding and informed decision-making.

Firms should design digital journeys to meet diverse customer needs, support vulnerable groups, and use clear layouts with plain English. Add friction if helpful, include visuals, involve frontline agents, and ensure testing for good outcomes, focusing on speed and timely information.

Different customer groups

Firms should better tailor digital journeys to the needs of their target customers, including offering alternative communication channels and additional support. They should analyse target markets to understand customer needs, including those acquired through various channels, requiring extra support, or with vulnerabilities. Digital-only firms must ensure support for non-standard issues and vulnerable customers, offering additional help for third-party referrals. Identifying vulnerable customers and testing support channels improves effectiveness.

Testing and quality assurance

Firms should test product information for clarity, ensuring fees and features are understood. Accessibility software simplifies language but may not aid comprehension of complex products. Therefore, firms must test language used in their website, apps and promotion and assess how easy it is to understand.

Testing should cover end-to-end journeys, device compatibility, and visibility of pages and settings. Firms should ensure that quality assurance, data and feedback is used to improve support and the digital journey. Quick digital journeys may lack necessary friction, and testing should ensure all customer groups achieve good outcomes.

Management information and oversight

Relying too heavily on online reviews, will rarely provide a full picture of customer outcomes. Data showing customers rushing through journeys without accessing key information or support should be analysed to improve design and outcomes.

Concluding remarks

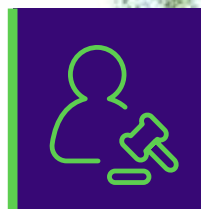
It is expected that the benefits arising from these technologies will continue to grow over the next three years. As the perceived benefits grow, so do the perceived risks. It is vital that firms consider the relevant risks and take into account the best practice guidance published by the regulator to improve their systems and processes and to ensure that they do not fall short of the Consumer Duty requirements and other relevant regulations.

“As the perceived benefits grow,
so do the perceived risks.”



Chris Laverty

Head of Financial Services Restructuring
Grant Thornton



Jarred Erceg

Partner, Financial Services Restructuring
Grant Thornton



Subprime lending:

A cornerstone for financial inclusion

A resilient subprime credit market is essential to providing access to credit among underserved groups and ensuring financial inclusion in a changing regulatory and competitive landscape.

The size and shape of the subprime credit sector has changed considerably over the past decade which has been driven by a combination of regulatory reforms, shifting consumer behaviours and economic pressure. By way of example, the 'high-cost' credit sector has reduced by almost £3 billion of lending since 2019, with more than 250 firms exiting the market, according to the **FCA**.

Growing concerns the subprime credit market is not currently delivering for consumers

But with so many lenders exiting the market, there are significantly fewer options available for non-prime consumers who need to access credit. Without this, non-prime consumers are forced to turn to illegal lenders, with more than **3 million adults** believed to have used an unlicensed lender or loan shark in the last three years. This is a threefold increase from the FCA's previous estimate of 300,000 in 2020.

Research shows that currently 16 million people are financially underserved, with around £2 billion of unmet but potentially commercially viable

credit need. A well-functioning subprime credit market is vital to meeting this need and presents an opportunity for firms, despite inherent challenges.

Challenges faced by subprime lenders

The rise of Buy-Now Pay-Later (BNPL)

The rapid expansion of the BNPL market has affected demand for subprime lenders, particularly those offering short-term, lower-value loans. Many consumers view BNPL as more accessible and cost-effective alternative, avoiding traditional credit checks and interest charges. However, from July 2026, BNPL providers will be subject to regulation and will be required to carry out affordability and creditworthiness assessments.

The FCA also plans to consult on introducing a mandatory requirement for BNPL providers to report to credit reference agencies. This shift is expected to improve consistency and coverage of consumer credit files, giving lenders a clearer view of a borrower's financial position and helping reduce the risk of consumers taking out credit beyond their means.

Regulatory and compliance

Firms are navigating a complex and evolving regulatory landscape. In March 2025, operational resilience rules came into force, requiring firms to identify key business services, set impact tolerances, and test their ability to operate within those limits during disruption.

Meanwhile, the implementation of the Consumer Duty introduced a higher bar for good outcomes and fair value to consumers. This can be particularly hard to assess in the subprime market, as **research** has shown that consumers in this market segment often value availability, timeliness and flexibility over price when making their borrowing decisions.

Technology and innovation

Many lenders continue to grapple with ageing IT systems that lack the flexibility and scalability needed to support today's increasingly digitised lending environment. Integrating alternative data sources to improve credit decisioning remains a challenge, while AI and machine learning presents an opportunity to enhance the customer journey and streamline operations.

At the same time, firms must contend with the growing threat of financial crime, including increasingly sophisticated fraud and cyberattacks that are harder to detect and mitigate. Meeting these demands requires significant investment.

Access to capital

Both economic uncertainty and a changing regulatory landscape over the past decade, including remediation exercises for historic lending practices, has deterred some long-term investors in the sector.

Funders are increasingly cautious, meaning subprime lenders are often reliant on more expensive capital from hedge funds or private credit, which can put pressure on profitability. In contrast, BNPL firms have been able to attract high levels of investment due to its significant rise in popularity among consumers.

Economic pressures

While inflation remains elevated, it is expected subprime lenders will see increased demand as households look to manage rising living costs and limited access to traditional credit. However, persistent inflation may challenge borrower affordability, increasing the risk of arrears and defaulting customers, particularly among financially vulnerable consumers.

While economic pressures, shifting consumer behaviours and a changing market landscape may present certain challenges, they also create opportunities for firms that can adapt and innovate.

Supporting financial inclusiveness

The Government has recently published its National Financial Inclusion Strategy, which incorporates the views of the **Financial Inclusion Committee** consisting of the FCA, the Money and Pensions Service (MaPS) and stakeholders from the industry.

Conclusion

Subprime lenders have faced many headwinds over the past few years, however, they play a critical role in the market, supporting financial inclusiveness and helping consumers access the credit they need. It is essential lenders have a viable and resilient operating model, allowing them to navigate change and fulfil their role in an inclusive, well-functioning consumer credit sector.

“

Subprime lenders have faced many headwinds over the past few years, however, they play a critical role in the market, supporting financial inclusiveness and helping consumers access the credit they need.

”

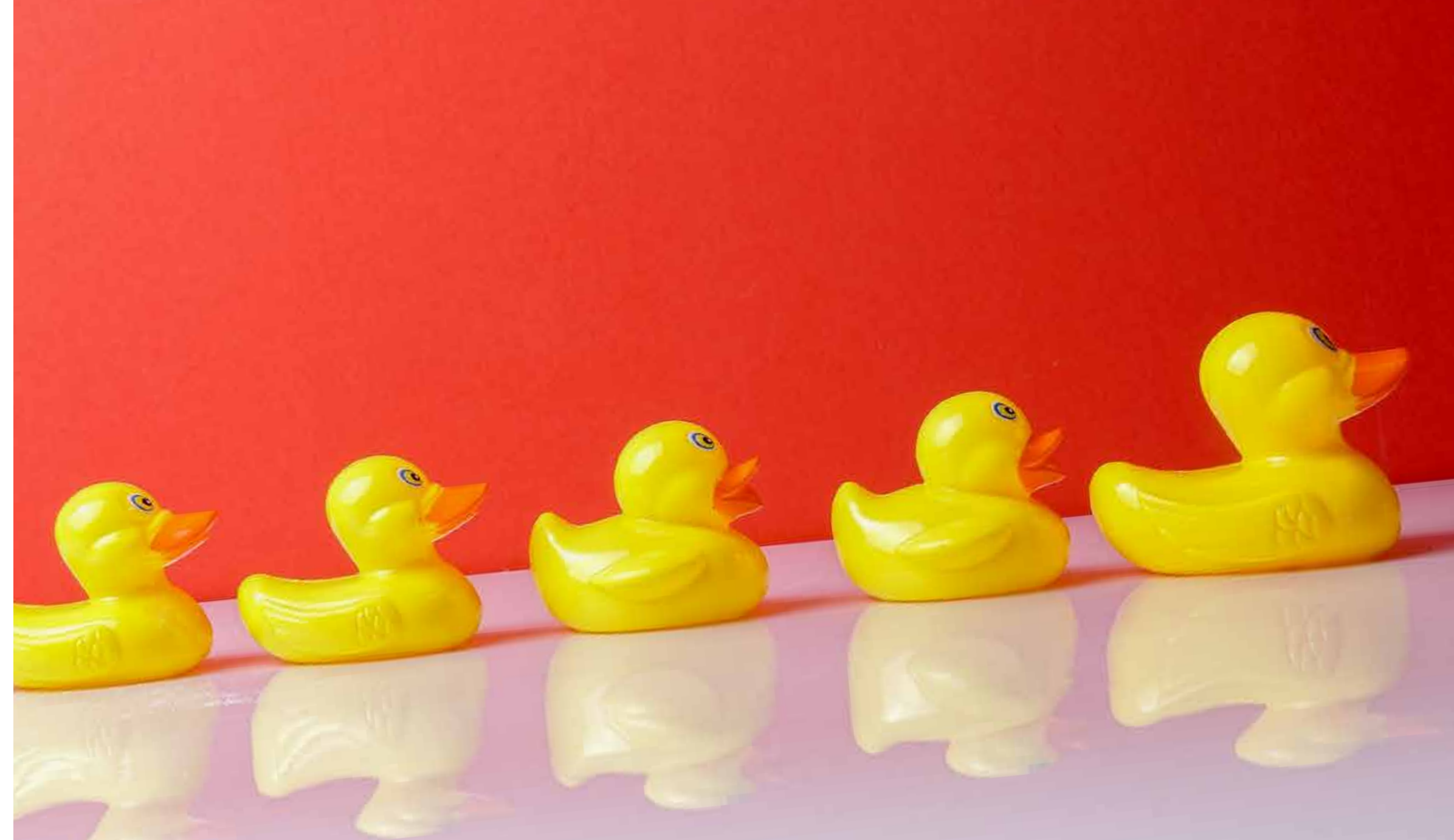


ccta

YEAR IN REVIEW

advocacy • policy & insight • comms • publications • events • improvements • looking ahead

2025 EDITION
AVAILABLE DECEMBER AT [CCTA.CO.UK](https://ccta.co.uk)



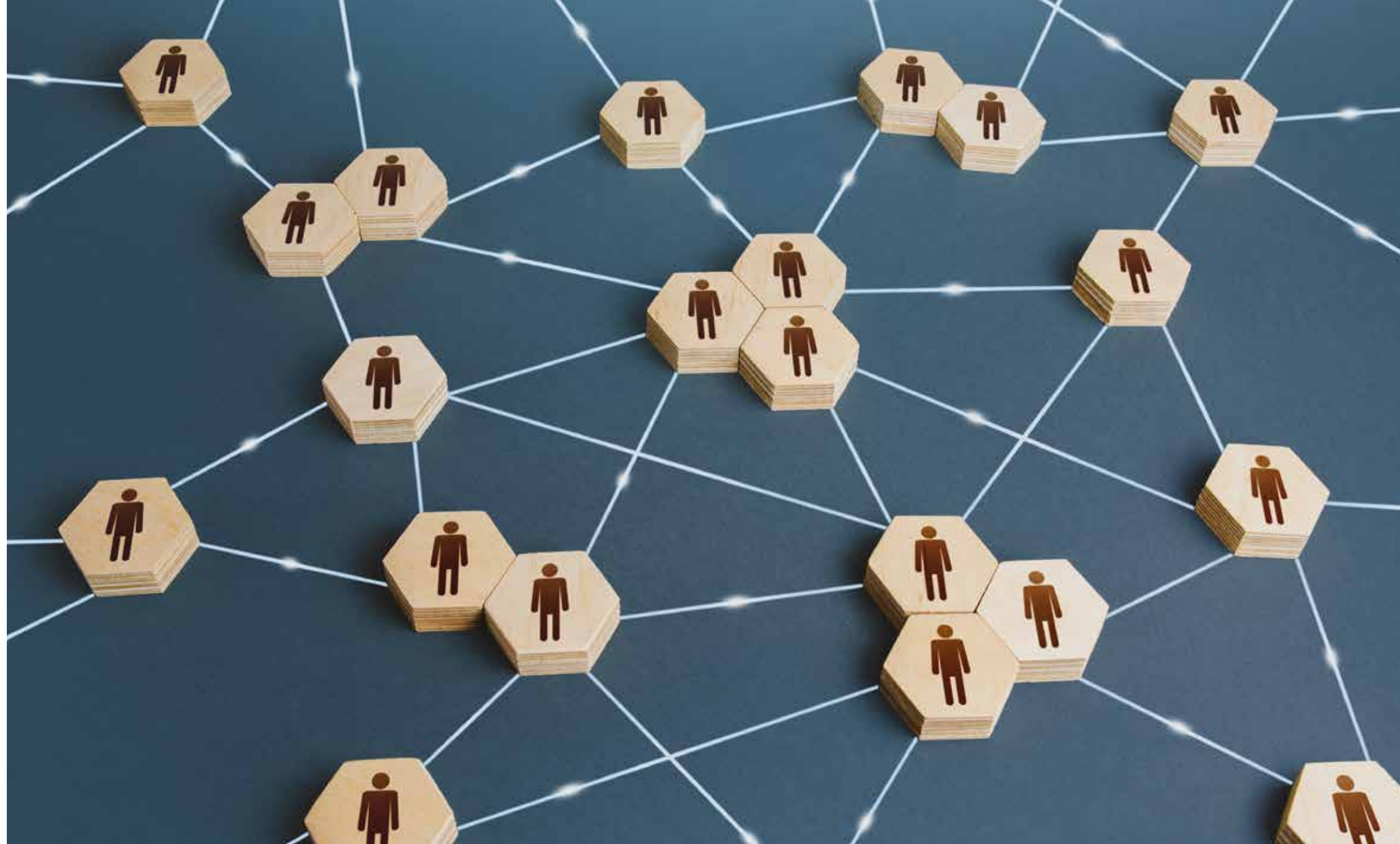
CCTA welcomes a range of new members to the association in 2025



The CCTA is delighted to welcome a number of new members this year. With history stretching back to 1891, the CCTA continues to stand as the trusted voice of the UK consumer-credit industry.

Joining the association, fresh organisations gain access to a network of peers, an extensive suite of compliance and training resources, and a platform to influence policy as regulation evolves. We look forward to collaborating with our new members as we work together to promote fair, sustainable and accessible credit for all.

Equifax • **London**
Paul LeeMark Finance Ltd • **Rochdale**
Monixa Ltd • **High Wycombe**
LexisNexis Risk Solutions • **Cardiff**
Redporth • **Wokingham**
Infact • **London**
Everything Financial Technologies Ltd • **Bristol**
Finclusion Ltd • **London**
Cozi Ltd • **London**
Snorkl • **London**
Lifestyle Loans Ltd • **London**
Mitsubishi HC Capital UK PLC • **Surrey**



Automate your way to smarter credit decisions with Equifax's InterConnect Originations



In today's demanding market, businesses are pressured to deliver fast, accurate credit decisions while meeting both regulatory requirements and consumer expectations. Relying on manual processes adds time, cost, and friction, risking customer loss.

Equifax InterConnect Originations is a powerful, flexible, cloud-based solution that automates and optimises credit decisioning. It drives faster, more consistent decisions by unifying Equifax's data, scores and seamlessly integrating third-party sources.

Harnessing multiple consumer data sources enables a unified financial view.

The solution is simple and flexible, with configurable rules to automate any part of the decisioning journey or provide a full end to end solution. Connecting easily via API or a user-friendly portal, InterConnect's swift setup streamlines processes and boosts operational efficiency immediately, empowering businesses to make smarter, data-driven decisions.

Find out more or email contactus@equifax.com.



coeo UK roundtables enter a new era



Since 2023, coeo UK's industry roundtables have brought together leading voices from financial services and utilities to discuss the evolving credit management landscape. Facilitated by Ian Parry, Strategic Relationships Director, these sessions have become trusted spaces for honest dialogue, practical solutions, and collaborative strategies.

Building on this success, the roundtables are moving to an invite-only format. A dedicated steering committee - drawn from existing members - will guide future topics and participation, ensuring continuity, trust, and deeper

collaboration. While curated, the group remains open to senior leaders who can add real value.

The model keeps the discussions industry-led, with coeo UK as host rather than owner. This approach raises standards across the sector by addressing core issues, fostering innovation, and strengthening relationships.

With a committed steerco and a focused cohort, the future looks ambitious and energised. Leaders interested in joining can email ianp@coeouk.com or richardg@coeouk.com.



Infact is driving better credit data quality across UK lending



Infact partners with lenders to increase profitable, responsible lending while driving better outcomes for their customers. By providing lenders with better tools and infrastructure, the licensed CRA enables more accurate credit profiles for customers, supporting financial inclusion and better-quality credit information.

Following Curve, Evlo, Moneyline, and others, Zopa Bank is the **latest partner** reporting all consumer credit information across its products. Infact now supports millions of individuals in building stronger, more accurate credit profiles,

and driving industry reform by providing a more complete picture of customer financial health whilst contributing to increased competition in the UK bureau market.

Infact is building a genuine challenger to legacy credit bureaus through an expanding network of lending partners and next-generation credit information solutions. From affordability assessment and real-time reporting to pre-submission validation with Delta, every capability is designed to prioritise accuracy, transparency, and customer outcomes.



Fair for You establishes itself as "a pioneering force" across the UK



Charity-owned lender Fair for You has achieved social impact worth £797m having lent to 100,000 customers in its first decade, an independent evaluation has found.

Fair for You, whose loans allow customers to buy household essentials at partner retailers, commissioned the research by charity the Centre for Responsible Credit (CfRC) to mark ten years since it was created in 2015.

The CfRC found a third of its customers had moved away from needing to use credit at all after repaying a Fair for You loan. Additionally, tens of

thousands of customers now have regular savings habits, are no longer in arrears on their rent or mortgage, and reported having less stress, anxiety and depression. Improved diets and enabling access to the internet are among other positive findings. The researchers put a total value of nearly £800m on these social impacts. With Fair for You having received £17m of investment, this equates to a social return of £46 for every pound invested.

The report's conclusion says that Fair for You *"has established itself as a pioneering force in the provision of affordable, responsible credit to low-income households across the UK"*.



Lantern scoops major industry accolade



Debt management company, **Lantern**, has been recognised by its industry peers as one of the UK’s leading firms for supporting customers with debt management services.

The company was named as Debt Purchaser of the Year at the 2025 Credit Strategy Collections & Vulnerability Awards, for its ethical solutions that help those in financial difficulty.

Now in its 19th year, the awards celebrate best practice across the debt collections sector, recognising companies demonstrating excellence in ethical recovery, customer care, and innovation.

Judges paid homage to Lantern’s commitment to improving customer satisfaction and helping them to build financial resilience. Its efforts to provide sustainable payment options and preventative measures to those who are managing debt was also praised.

Paul Mason, CEO of Lantern, said: *“We’re incredibly proud to have our work recognised at this year’s Collections & Vulnerability Awards. These achievements are a testament to our amazing team, who put people at the heart of everything they do.”*



Perch Connect is launched in partnership with Durban-based Procera



Perch Connect is a specialist contact-centre outsourcing provider supporting UK businesses from a centre of excellence in Durban, South Africa. A subsidiary of Perch Group and launched in partnership with Durban-based Procera, it combines world-class customer engagement expertise with measurable cost efficiencies, operating within a robust, consumer-focused governance framework.

As an operational extension of Perch Group’s customer engagement capabilities, Perch Connect delivers a full suite of contact-centre and back-office services – including customer service, debt collection, sales, quality assurance, and technical support – across sectors such as financial services, retail, utilities and telecommunications.

By leveraging Procera’s 2,500-strong workforce and advanced infrastructure, Perch Connect provides scalable, high-quality services at less than half the cost of equivalent UK operations. Its people-first culture, rigorous training, and compliance-focused processes ensure outstanding service quality and customer satisfaction.

Led by Managing Director Luke Dillon, Perch Connect offers seamless, transparent outsourcing that prioritises performance, governance, and positive customer outcomes. To learn more, visit www.perchconnect.co.uk.



Nicola Crump

Advisory Director
Square 4

At Square 4, our flagship Consumer Duty thought leadership programme has given us unparalleled insight into a wide range of Consumer Duty board reports across wealth management, CASS, consumer credit, insurance, and banking. We've identified not just common themes and pitfalls, but also the strategies that set market leaders apart.

Searching for the key?

Unlock competitive advantage with Square 4's Consumer Duty board report expertise

What does this mean for your business?

It is evident from our reviews that firms are investing significant effort into embedding and evidencing Consumer Duty with a demonstrable commitment to doing the right thing.

Our reviews show that the most successful firms are those who can clearly evidence good customer outcomes, not just through strong narrative, but with robust, quantifiable data and evidence that draws on the FCA's 2024 publication on Consumer Duty Board Reports: Good Practice and Areas for Improvement.

What common pitfalls do firms face?

1. Linking data to good customer outcomes

A common pitfall is the lack of data and metrics that evidence and substantiate the conclusions made. While firms' reporting commentary is strong, it is often 'task' or 'action' focussed without underlying quantifiable measures that evidence good customer outcomes and the mitigation of harm. Where data and metrics are provided, many firms continue to rely on measures that are largely predicated on:

- internal processes and operational KPIs (call handling times or average speed to answer)
- compliance and control metrics (monitoring reviews completed to schedule)

- activity volumes (number of vulnerable customers identified)
- static or aggregated data without segmentation (segmentation for vulnerable customers)
- customer satisfaction & experience (C-SAT scores)

The use of control KPIs and customer satisfaction measures is not sufficient in itself to demonstrate good customer outcomes and the mitigation of harm.

2. Weak outcome to harm frameworks

We believe this often reflects a deeper issue, this being the absence of clearly defined customer outcome statements that are explicitly mapped to foreseeable harms. Without this solid foundation, it becomes difficult for firms to identify meaningful data and metrics that demonstrate how controls are mitigating those harms and how firms are performing against their desired customer outcomes.

Firms that are making the strongest progress under the Duty are those that have invested time in:

- articulating precise outcome statements
- linking them to specific harms; and
- establishing evidence based indicators of success.

This allows their boards to confidently assess and opine upon the effectiveness of controls and monitor progress over time with greater confidence.

How can we help?

Firms who partner with Square 4 stand out - showing a clear, evidence-based link between outcomes, harms, and metrics. This isn't just about meeting regulatory expectations; it's about building trust, driving growth, and differentiating your brand in a competitive market.

Contact our team at hello@square4.com to discuss how we can help you strengthen your Consumer Duty governance, reporting and outcomes monitoring frameworks, and unlock new opportunities for your business.





Mark Oppermann

Director of Conversational AI
Aryza



Lenders are continuously facing increased regulatory pressure, rising customer expectations, and ongoing economic uncertainty. **The ability to provide timely, relevant, and sensitive support is more important than ever.**

Artificial intelligence is becoming an increasingly powerful enabler in this area, not just in assessing affordability or making lending decisions, but in how organisations engage with borrowers throughout the credit lifecycle.

Previously, the bulk of lender–customer interactions happened in contact centres. However, as financial journeys grow more complex and customer needs become more nuanced, expectations have shifted. Phone calls are now often a last resort, with few willing to wait to speak to an agent. In response, lenders are adopting intelligent automation to provide support that is scalable, consistent, and genuinely helpful. Conversational AI, driven by

AI that listens

Intelligent automation is changing the way we support borrowers

natural language processing and supported by real-time data, can now deliver personalised assistance at scale. From checking balances and setting up repayment plans to guiding customers during financial stress, these tools aim to make financial conversations feel simple, accessible, and human.

Digital channels are now the preferred option for most customers, this shift supports both customer empowerment and internal efficiency, creating a more streamlined and responsive service model that benefits all parties involved in the relationship.

What sets this apart from traditional chatbot technology is its focus on context and continuity. AI can now "listen", not in a literal sense, but by understanding sentiment, tone, and behavioural signals across digital interactions. It can identify when a customer is anxious, frustrated, or displaying signs of vulnerability, and adjust its responses accordingly. For example, if a customer expresses concern about making a payment, the system can offer flexible repayment options, use supportive language, or escalate to a human advisor.

This level of responsiveness not only improves the customer experience but also supports firms in meeting regulatory expectations around fair treatment and care for vulnerable customers. By using AI to incorporate empathy and personalisation

into every interaction, lenders can develop more consistent and transparent engagement journeys.

Operationally, the benefits are just as compelling. AI-powered automation manages high volumes of customer conversations in a compliant manner, reducing pressure on contact centre teams and ensuring consistent, 24/7 support. Interactions are easy to track and report on, helping organisations meet regulatory requirements while improving the overall customer experience.

As regulatory focus sharpens on customer outcomes, especially for those facing difficulties, intelligent engagement is rapidly becoming a strategic priority. It's no longer just about the decisions made, but how those decisions are communicated and supported in the moments that matter.

(AI) can identify when a customer is anxious, frustrated, or displaying signs of vulnerability, and adjust its responses accordingly.

Financial stress in the UK

What the latest data tells us



Neil Allen
Head of Strategy
LexisNexis Risk Solutions



Financial wellbeing is a cornerstone of modern life, yet for millions of UK adults, it remains out of reach. New research on financial stress in the UK by LexisNexis® Risk Solutions reveals that the scale of financial exclusion and credit distress is still significant, despite some progress in recent years.

Behind every statistic:
The human cost of financial stress

The report reveals that 7.34 million adults, or around 13% of the UK population, are experiencing severe financial stress. This group faces barriers to affordable credit and essential banking services, leaving them vulnerable to hardship.

A closer look at the data shows:

- 3.14 million adults (6%) have at least one negative financial event on their credit profile in the past six years. Most relate to CCJs, with 2.8 million issued during that period. The figures indicate a worsening problem, with CCJ volumes rising by 7% in the past year, and the average judgment value increasing by 18% to £2,088.

- 2.88 million people (5%) are classed as financially excluded because they lack an adequate credit footprint to be credit scored. Of these, 1.1 million have no active bank account and over 567,000 are classed as “thin file”, meaning their data footprint is almost non-existent.
- 2.43 million adults (4%) cannot secure any short-term loan arrangement despite making an average of 36 applications each. Loan denials are on the rise – almost 1 in 3 applicants failed to secure any offer in 2025, compared to 1 in 5 two years ago.

A lack of access to any form of legal lending service may force individuals towards illegal lending routes. Research from Fair4All Finance suggests around 3 million UK adults borrowed from illegal lenders in the past year.

Living on the edge:
Stories hidden in the data

Financial exclusion’s implications stretch well beyond impacting someone’s ability to borrow. Without a bank account or a useful credit history, consumers can struggle to access competitive rates on everyday essentials like mobile tariffs, energy plans and car leasing deals. For many, this creates a cycle of disadvantage that’s hard to break.

Even those with a history of financial stability can encounter difficulties, for example, when their credit histories don’t travel with them if they migrate to the UK from other countries. Without any clear guidance on how the UK credit system works, it can be trial and error for those trying to establish themselves here. The rise in CCJs is another warning sign. With judgments remaining on credit records for six years, they can severely impact future borrowing and financial stability.

How data can drive change

The good news? Alternative data can help. Our research indicates that 55% of financially excluded UK individuals can be scored using alternative data and that 80% of them will be rated as low-risk customers. That’s 1.4 million additional people gaining transformative access to affordable financial services, potentially for the first time in their lives.

What if too much data results in more declines? Our analysis shows the opposite trend is true - more positive outcomes for consumers overall. Where alternative data is included, we see significant numbers of consumers transitioning from higher-risk to lower-risk categories and therefore eligible to receive more affordable offers from lenders and creditors.



Enjoyed this article? Take a look at our ebook on **driving financial inclusion for the new to credit** [here](#)



Time to move?

Lessons from successful migrations



Simon Kidner
Senior Solution Architect
Lenvi



Stephen Aspland
Senior Consultant
Lenvi



A successful migration is more than moving data - it's about transforming both the data and the business. Having led and seen dozens of migrations, here are the lessons that matter most before making the leap, informed by some of Lenvi's recent migration projects.

Every lender's business is unique. Products vary, data volumes can be massive, and old systems are rarely a neat fit with new platforms.

A lending migration means data creation, manipulation, and manufacturing; mapping it into new formats, reconciling edge cases, and ensuring your business processes still deliver on the customer promise.

The technical and operational implications touch everything from customer communications to reporting and regulatory compliance.

Data transformation is key

Migration should never be viewed as a simple "lift and shift" project. Transformation is critical. For example, when source data fields didn't fit the new database, the solution was to use configurable attributes for overflow. Retrieving data in a way that keeps communications accurate while minimising changes or costs is vital. Code and queries need to support business logic, not just mirror old structures. Early resolution of legacy quirks prevents downstream disruption.

Anticipate edge cases

Legacy data nearly always contains unexpected issues or anomalies. Most migration effort is spent cleaning and validating records. Using the most recent production data in test environments is best, as clean test data rarely reflects reality. Build in time for hands-on review and data remediation.

Ownership drives results

While working with external partners can appeal from a cost perspective, in practice, when the platform provider's migration team with deep database and system knowledge owns the mapping, transformation, and validation, it is faster and more effective.

Evolving configuration

Migrated data must fit new system parameters, which may change as requirements evolve. Early collaboration between migration, engineering,

and product teams keeps system rules and data relationships aligned, ensuring go-live readiness.

Test real-world scenarios

Testing must reflect how the business will operate post-migration. Activities carried out daily by users and customers require specific validation by the same teams who'll operate the system. Forming a cross-functional test team ensures workflows - rather than just scripts - are properly assessed.

Plan for resources and time

Migration requires dedicated focus. Client teams cannot balance complex migration tasks alongside normal roles. Plan for full-time resources, prioritise migration work internally, and recognise robust migrations generally require more time and planning than expected.

Prioritise security sign-offs

Delays around security and production environment approvals, like penetration tests or GDPR checks, can stall go-live. Build these into the timeline early and keep all stakeholders aware of what's required.

Final thoughts

Strong technical ownership, early collaboration, business-fit configuration, meaningful testing, and a focus on data quality are central to successful migrations. Though complex, with proper preparation and experience, migrations can deliver operational and compliance improvements businesses need.



UP TO
50% MEMBER
DISCOUNT*

* email academy@ccta.co.uk for details

NOW OPEN TO **NON-MEMBERS**

PLATFORM FEATURES

- ✓ record external CPD
- ✓ Live Learning sessions
- ✓ add company specific policies
- ✓ add your own courses
- ✓ request a bespoke course
- ✓ MI and reporting
- ✓ access anywhere
- ✓ bulk sign-up assistance
- ✓ Excel exporting

ONLINE LEARNING & DEVELOPMENT

CCTA Academy is built on our experience and insights from our membership. With a specific focus on consumer credit compliance, The platform provides tailored online training modules at staff and manager levels. It also accommodates ongoing learning and development opportunities through Live Learning sessions from CCTA.

The compliance training modules are relevant to the training and competency expectations of the FCA. The platform allows full audit facilities, providing firms with a solid foundation when it comes to proving that their team members are well-trained.



For more information, view
the **CCTA Academy brochure**

COURSE LIST

- | | | | | | | |
|------|---------|------------------------------------|-----------------------|---------|-----------------------|---------------|
| CORE | + | intro to the FCA & consumer credit | SECTOR | + | retail finance | |
| | + | conflicts of interest | | + | pawnbroking | |
| | + | whistleblowing | | + | motor finance | |
| | + | consumer duty | | + | guarantor loans | |
| | + | cyber security | | + | high-cost short-term | |
| | + | regulated complaint handling | | + | home-collected credit | |
| | MANAGER | + | vulnerable customers | + | personal loans | |
| | | + | anti-bribery | MANAGER | + | UK GDPR |
| | | + | anti-money laundering | | + | SM&CR |
| | | + | data protection act | | + | consumer duty |
| + | | financial promotions | + | | responsible lending | |
| + | | SM&CR - staff conduct rules | | | | |

The season to be jolly?

How to avoid Christmas cheer turning into credit rear

As the festive season approaches, so too does the pressure to spend. From social media wish lists to endless retail promotions promising the 'perfect' Christmas, the expectation to buy, give and celebrate grows stronger each year.

As a result consumers are choosing to spread the cost of festivities, leading to a surge in short-term credit, particularly through Buy-Now, Pay-Later (BNPL) schemes.

Last year, BNPL schemes accounted for an estimated 13.9%, some £3.6 billion, of the UK's festive spending, according to Adobe Analytics. This shows no sign of slowing, with recent [research](#) revealing that one in seven shoppers plan to use BNPL to fund their festivities this year.

It's easy to see the appeal. BNPL offers quick, flexible finance with minimal friction, offering quick credit, manageable instalments, and often interest-free payments. It fits seamlessly with modern consumer habits too, particularly among younger generations. More than two thirds of millennials (69%) and Gen Z (68%) admit they've used some form of BNPL scheme.

While BNPL can be a useful budgeting tool, it carries risks for those struggling to manage their finances. The convenience can mask the reality of debt, becoming a costly trap, especially for young adults who are facing financial hardships.

Last year, one in four 18-24 year olds (around 1.3 million) faced financial difficulty in the run-up to Christmas. This year is expected to be no different, with many facing job instability and lower incomes.

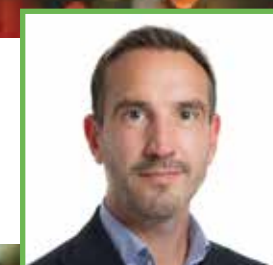
BNPL schemes can create an illusion of affordability. Splitting payments into smaller chunks makes big purchases seem manageable, yet juggling multiple instalments can quickly spiral into unmanageable debt, especially when unexpected costs arise.

This isn't a call to restrict BNPL schemes, but rather a call to promote better understanding. The financial sector, from lenders to banks to debt recovery firms, has a vital role in educating consumers about repayment schedules, interest, and credit reporting. By doing so, we can help people borrow responsibly and avoid festive financial hangovers.

For customers considering BNPL schemes, practical steps can make a huge difference. Setting realistic budgets, prioritising essentials, and resisting the

urge to overspend can avoid the financial strain brought about by Christmas.

For those who do feel it, reaching out early for support, whether through advice services or ethical debt recovery partners, can prevent matters from worsening.



Ian Davies

Servicing & Partnership Director
Lantern Group



At Lantern, we've seen how compassionate guidance and open conversations can help people avoid debt, and the financial industry must lead with transparency, supporting customers to get their finances in order before they laden themselves with debt. In doing so, they can enjoy Christmas without the worry of financial stress which lingers into the new year.





To customers, lenders and brokers are one experience. The FCA's Consumer Duty makes that explicit: any firm that can determine or materially influence a retail outcome has responsibilities commensurate with its role.

That has real consequences for distribution. Manufacturers must design products for a defined target market and monitor how brokers sell them, including the cumulative impact of fees and commissions on fair value. Discretionary commission models in motor finance are gone, but the principle remains: if incentives can predictably distort outcomes, they must change.

Shared Duty, shared outcomes

Lenders and brokers: Effective broker oversight

Due diligence and contracts now need a Duty lens. Lenders should secure the right to MI, audits and mystery shops, and act when visibility is limited. Brokers, for their part, are manufacturers of the broking service: they must evidence fair value in their own charges, disclose commissions in a way customers actually understand, and share information upstream.

If you use Appointed Representatives, remember the FCA has strengthened principal responsibilities: onboarding and scope control, annual reviews, and real-time oversight. Treat AR governance as part of distribution risk, not a separate compliance ritual.

Good practice

- **Map each product's target market and distribution, then monitor high-risk segments and channels.** Build a contractual MI pack (acceptance rates, APR ranges, fees, complaints, arrears, forbearance usage) by broker and act on what it shows.
- **Govern commissions and incentives.** You should pre-approve models, test cumulative value (including broker add-ons), and link pay to sustained affordability and customer understanding, not just originations.

- **Assure delivery, not just design.** Run file reviews and mystery shopping focused on explanations and vulnerability handling; sample affordability assessments for data sufficiency; set outcome triggers (complaints, early arrears, "worse-off" cohorts) that force interim review and remediation. Report it to the board, not just the compliance committee.

Why this matters now

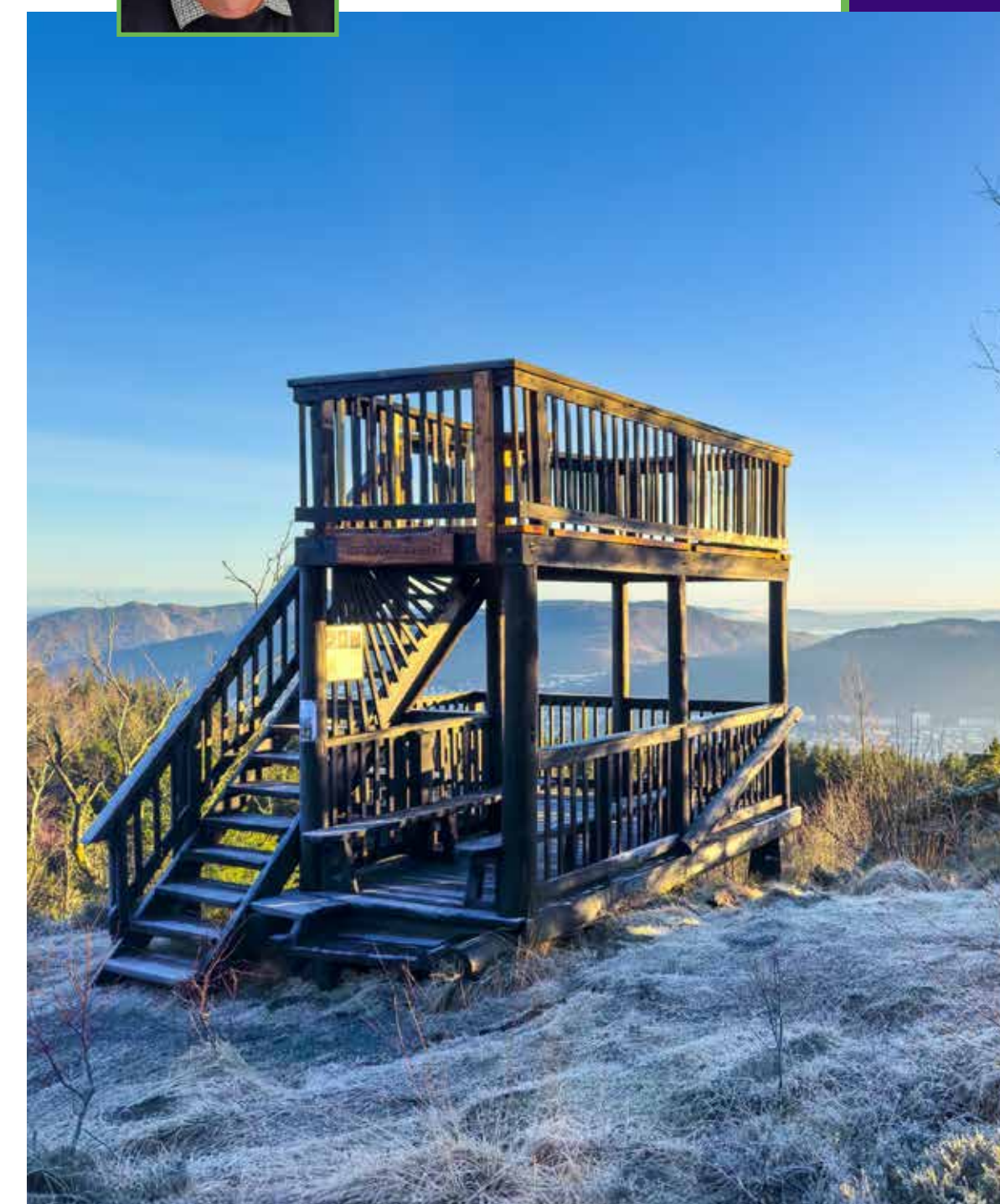
The regulator's scrutiny of motor-finance complaints and the in-flight redress scheme shows the direction of travel: you will be judged by your outcomes and how quickly you fix them. The smartest firms are acting like one chain, co-designing communications, sharing MI, and aligning incentives to customer success.

If you're re-cutting broker oversight, fair-value workbooks or AR governance, it is vital that you implement controls that stand up to board and FCA challenge. For example, broker MI heat-maps (acceptance, APR dispersion, early-arrears), pre-approved commission models with outcome back-testing, and a fair-value workbook that captures total economic cost including part-exchange effects. Take the opportunity to build something robust for today and resilient for what comes next.



Richard Brown

Director of Advisory Services
Redporth



If you're refreshing broker oversight, fair-value workbooks, affordability controls or AR governance, take care to build practical controls that stand up to board, and FCA challenge, such as open-banking challenge playbooks with documented sustainability tests, automatic outcome triggers that force interim reviews, and risk-based AR oversight with MI rights, mystery shops and annual onsite reviews, backed by an audit-ready evidence library you can trust.

VRPs versus card payments:

The future of loan repayments and collections

ACQUIRED.com

For lenders and consumer credit firms, reliable and cost-effective payment collection is critical. As card payments face increasing costs, failures, and compliance pressures, Variable Recurring Payments (VRPs), powered by Open Banking, are emerging as a transformative alternative. For lending businesses managing recurring payments, understanding this comparison is crucial for optimising revenue collection and reducing operational overheads.

VRPs enable businesses to collect recurring payments directly from borrowers' bank accounts under pre-set parameters, such as amount and frequency, without requiring re-authentication for each transaction. The shift represents more than just a technological upgrade - it's a strategic move towards more reliable, cost-effective, and customer-centric payment collection.

Comparing the two payment methods

Card payments use the card-on-file model, where borrower payment details are tokenized and stored securely for recurring charges. With VRPs, SCA and direct bank connections eliminate the need to store sensitive payment credentials.

VRPs generally have lower costs as they bypass Scheme and Interchange fees, and also have reduced levels of chargebacks, fewer payment failures, and minimal fraud prevention needs. Cards often have higher costs with percentage-based fees for high-value transactions, in addition to costs for fraud prevention tools, chargeback management, and PCI DSS compliance.

Cards are certainly more familiar to end customers, but can be prone to issues like expired cards

and insufficient funds leading to disruptions and customer frustration. With VRPs, customers can set up payments seamlessly without entering card numbers, expiry dates, or CVV details. This eliminates manual data entry, reduces the risk of failed payments, and creates a smooth experience from setup through to ongoing transactions.

The future of recurring payments

With VRP transactions growing by 393% over the last two years, businesses adopting VRPs early can gain a competitive edge. While card payments remain popular for low-value transactions, VRPs offer lower costs, better success rates, and enhanced customer experiences, making them the future of recurring payments. The choice between VRPs and traditional payment methods ultimately depends on business specific requirements and

customer demographics. However, the evidence clearly favours VRP adoption for businesses prioritising cost reduction, payment reliability, and customer experience enhancement. Financial services businesses, in particular, may benefit from VRP capabilities due to their recurring revenue models and sophisticated customer bases. The desire for lower costs, higher success rates, and enhanced flexibility makes VRPs particularly attractive for insurance premiums, loan repayments, and subscription services.

Many businesses find success in offering VRPs alongside traditional payment options, allowing customers to choose their preferred payment experience whilst benefiting from improved collection performance overall.

The payment landscape continues evolving rapidly, but the fundamental advantages of bank-mediated transactions - security, reliability, and cost-effectiveness - suggest VRPs will play an increasingly central role in modern recurring payment strategies. Businesses looking to optimise their payment infrastructure should seriously consider VRPs as part of their strategy.

Want to find out more about VRPs? [Get in touch with Acquired.com.](#)



Lawrence Byers

Senior Product Manager
Acquired.com



Financial services businesses, in particular, may benefit from VRP capabilities due to their recurring revenue models and sophisticated customer bases.

The rise of the fake consumer: Why the UK must act on synthetic fraud

It wasn't until late 2024 that UK fraud leaders began taking notice of the rise of synthetic identity fraud – until then it had been an unrecognised threat, with most organisations lacking monitoring and reporting insight. However, in the US, synthetic identity fraud has been **surging**, with estimated exposure of **\$3.1 billion across sectors in 2024**.

Concern within UK organisations is shifting from “*synthetics aren't a problem*” to “*they might be, we just don't know how to solve them*”. According to **recent TransUnion data**, 91% of fraud leaders are

now concerned about synthetic identities affecting their portfolios, with UK Finance estimating a **£300m annual cost** to UK financial institutions. Translating concern to impact, synthetics as a predominant cause of UK fraud losses grew from 13% in 2024 to 23% in 2025 – **the same level** as scams / authorised fraud.

Synthetic identities are built to deceive. In the US, they often centre around a stolen Social Security Number (SSN), alongside real and fictitious data. In the UK, the absence of a SSN arguably makes it easier: any name and date of birth tied to a genuine UK address can pass as legitimate, often evading traditional verification controls.

A typical synthetic identity journey may follow:

1. A fraudster creates a persona using fake personal details and a real UK address
2. They apply for low-value products, such as BNPL, mobile contracts and insurance to build a footprint
3. As the identity gains credibility, they access higher-cost, low-limit lending
4. They repay diligently, building a strong credit score
5. Eventually, they secure high-limit products, then bust out and vanish.



Chad Reimers

General Manager of Fraud & ID
TransUnion UK



What makes synthetic fraud such a threat is its ability to go unnoticed for months, or years. Despite firms having fraud prevention and monitoring services, synthetic fraud is commonly misclassified as first-party fraud, No Intent to Pay, or credit defaults.

TransUnion works with organisations to rethink digital identity and to consider this as journeys, not static datapoints, through:

- **activity analysis:** Track behaviour across credit lines and longer time periods
- **trust & risk signals:** Link identities to email and mobile networks
- **device intelligence:** Detect evasion tactics and build device reputation views
- **biometric verification:** Use robust identity and selfie checks, with deepfake protection
- **exposure screening:** Periodically assess customer base for ‘sleeper synthetics’

Synthetic identities are a growing threat, especially as AI helps fraudsters bypass traditional checks. Building a clear picture of identity isn't just about stopping fraud; it's about protecting reputation, financial performance, and customer trust in a digital world – where appearances can deceive.

ACQUIRED.COM

SYSTEMS & SOFTWARE

Acquired.com is a next-generation payments business focused on powering recurring commerce.

Founded in 2015, Acquired.com was born from a relentless dedication to customers and their business goals. At the heart of Acquired.com lies a commitment to empowering businesses with next-generation payments solutions and the essential industry expertise they need to thrive in the digital economy.

Providing a unified solution combined with a highly personalised service, we give competitive advantage to our customers in an industry too often reliant on disjointed solutions. Our mission is to become a fundamental part of the payments infrastructure for recurring commerce, anticipating and responding to the evolving needs of our customers.

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



acquired.com

ADDLESHAW GODDARD

LEGAL

Depth and breadth of expertise: With 269 partners and over 900 lawyers, we have a deep understanding of our markets and sectors.

A global offering: We have thirteen offices worldwide, six UK offices and seven overseas, together with a network of likeminded law firms around the globe. Where we don't have offices, we work with firms well known to us, to deliver an international capability.

A strong client base: We have instructed over 35 FTSE 100 companies in the last twelve months. 75% of our clients who have been with us for more than ten years.



addleshawgoddard.com

ALPH LEGAL AND COMPLIANCE

CONSULTANCY

Providing Compliance and Legal services to Consumer Credit Businesses since 2014, ALPH Legal & Compliance have worked with many firms in all aspects of their business liaising with the FCA and ICO.

As a consumer credit consultancy, compliance with the law, regulation and guidance is imperative for the survival of your business. Advice is available on: Authorisation and regulatory business planning, supervision, crisis management, s166 and communicating with the FCA, complaints reporting/root cause analysis, creditworthiness and affordability, social media/marketing.



alphlegal.com

armalytix

SYSTEMS & SOFTWARE

For regulation and risk, at various times you're going to need to know your customer's specific financial position. We'll tell you.

For all consumer credit firms, Armalytix gives you:

- The specific financial position of any of your customers, whether current or historic.
- The critical information you need to assess the risk, analysed and highlighted.
- The power to make the right decisions, fast.

Armalytix, an FCA regulated firm, makes it simple for you to spot the customers you need to focus on and helps you comply with Consumer Duty obligations with faster and more effective affordability and creditworthiness checks.



armalytix.com



SYSTEMS & SOFTWARE

Aryza is a global provider of Credit & Debt Lifecycle Management SaaS solutions, working 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, collections, recovery, GRC 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 and debt 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



ASSOCIATE

Auto Trader Group plc is the UK and Ireland's largest automotive marketplace. Our marketplace sits at the heart of the car buying process, with the largest number of buyers and the biggest choice of trusted stock.

Auto Trader exists to change how the UK shops for cars by providing the best online car buying experience and enabling all retailers to sell online. We are building stronger partnerships with our customers, using our voice and influence to drive more environmentally friendly vehicle choices and creating an inclusive and diverse culture for all of our people. Auto Trader listed on the London Stock Exchange in March 2015 and is a member of the FTSE 100 Index.



plc.autotrader.co.uk



LEGAL

We launched Auxillias in May 2020 to provide high quality and solutions-focused advice, consultancy and training services to support the motor, asset and consumer finance markets.

We work in partnership with our clients and have prioritised a consultative and collaborative approach. Our team consists of subject matter experts from a diverse mixture of backgrounds with both contentious and non-contentious experience and a unique blend of legal, governance, regulatory, compliance and risk skillsets.

What sets us apart is that most of us have worked in-house, giving us a real understanding of our clients' needs and helps us to provide holistic advice and guidance on complex regulatory and compliance matters in a digestible, business-focused and user-friendly way. At the end of 2023, we were proud to be ranked as a leading firm in Consumer Finance in Chambers and Partners for the first time.



auxillias.com



DEBT PURCHASE / COLLECTION

A market-leading collections agency offering a full suite of outsourced services with an approach that sets a new standard in customer engagement and rehabilitation.

Coeo provide technology driven credit management solutions that maximise customer engagement ensuring your bad debt volumes are kept under control.

With years of industry experience and a full suite of compliant end-to-end services, we can help with any stage of the collections cycle, leaving you to do what you do best.



coeo-group.ai



ASSOCIATE

Credit Connect is a media news and events company. The news site exists to deliver segmented relevant content and information to the lending, credit, collections and insolvency sectors.

The brand also includes a number of digital and face to face networking events including the Credit & Collections Industry Awards, Lending Technology Think Tank, Collections Technology Think Tank and the Credit & Collections Technology Awards plus many more.



credit-connect.co.uk



DEBT PURCHASE / COLLECTION

We are a specialist debt purchaser, acquiring accounts where customers are engaged in managed debt solutions such as Individual Voluntary Arrangements (IVAs) and Debt Management Plans (DMPs). With over 85 years of combined expertise in financial services, collections, and portfolio sales, our team brings a deep understanding of this unique market, helping institutions unlock value in these assets.

Our goal is to make the debt sale process seamless. By partnering with us, your business can free up capital to support existing clients, fund new lending, or ease cash flow pressures.

We take pride in managing customers with care, efficiency, and sensitivity, recognizing the challenges faced by vulnerable individuals. Our empathetic and professional approach ensures positive outcomes for both our clients and their customers.

With a proven track record, specialist knowledge, and a commitment to excellence, we set the benchmark in IVA and DMP debt purchasing.



curacareonline.co.uk



CREDIT REFERENCE AGENCY

At Equifax, we believe knowledge drives progress. As a global data, analytics, and technology company, we play an essential role in the global economy by helping financial institutions, companies, employers, and government agencies make critical decisions with greater confidence. Our unique blend of differentiated data, analytics, and cloud technology drives insights to power decisions to move people forward.

Headquartered in Atlanta and supported by nearly 15,000 employees worldwide, Equifax operates or has investments in 24 countries in North America, Central and South America, Europe, and the Asia Pacific region.

Equifax Ltd is one of the Equifax group companies based in the UK. Equifax Ltd is authorised and regulated by the Financial Conduct Authority. For more information, visit equifax.co.uk and follow the company's news on LinkedIn.



equifax.co.uk



CONSULTANCY

Founded by John Cameron, former General Counsel of Account Technologies (Safety Net Credit and Tappily), Fractional GC specialises in providing incisive legal and strategic advice to entrepreneurial fintechs and consumer lenders without in-house legal teams.

Drawing on over twenty years of consumer credit expertise, we deliver pragmatic, commercially-focused advice without the bureaucracy and excessive costs of traditional law firms. By combining John's sector experience with cutting-edge legal AI tools, we offer significantly more cost-effective and pragmatic advice whilst maintaining a swift professional service and exceptional quality.

Services include advising on commercial contracts, corporate transactions, employment matters, disputes and company secretarial.

Our flexible engagement model suits businesses, whether you need ongoing support or prefer our competitive hourly rates for specific projects.



020 3582 6260



LEGAL

What does business need now? An adviser that offers a different experience. A better experience. One that delivers technical expertise and a service that goes beyond. Personal, proactive, and agile. That's Grant Thornton.

The UK member firm employs over 5,000 people who operate from 23 offices, are led by 200 plus partners with a turnover in the 12 months to December 2022 of £648 million. We combine global scale with local insight and understanding to give you the assurance, tax, and advisory services you need to realise your ambitions.

We go beyond business as usual, so you can too. We make business more personal by investing in building relationships. Whether you're growing in one market or many, you consistently get a great service you can trust. We work at a pace that matters – yours – bringing both flexibility and rigour. We celebrate fresh thinking and diverse perspectives to bring you proactive insights and positive progress.

 grantthornton.co.uk



CREDIT REFERENCE AGENCY

Infact is the UK's first real-time credit bureau, delivering innovative credit information products. As the UK's fourth CRA, Infact is driving the fundamental transformation of credit information flow towards real-time processing, enabling more precise risk assessment and improved consumer outcomes.

Infact addresses critical market inefficiencies created by legacy credit reference agencies that operate on inflexible technological infrastructure and limit industry innovation. The company's platform supports credit and affordability decisioning across acquisitions, customer management, and collections. This enables lenders to increase approval rates, reduce default rates, and enhance financial inclusion alongside regulatory compliance.

 infact.io



LEGAL DEBT PURCHASE / COLLECTION

A customer champion Debt Purchaser, having been awarded the coveted GOLD accreditation from Investor In Customers for two years running. Our growing customer base of c3m is proof as to why Lantern is consistently chosen as the trusted partner to lenders looking to sell their customer portfolios where vulnerability is evident.

Lantern operates at the highest level of corporate governance and interpretation of FCA rules and guidance, with the lowest upheld complaint levels against those of our peers. Our core specialism is managing vulnerable customers carefully through the lens of our Single Customer View, across both performing and non performing debt portfolios.

 lanternuk.com



DEBT PURCHASE / COLLECTION

We are revolutionising lending. Lenvi is a fintech specialising in B2B consumer and commercial lending software and solutions. It combines global expertise, market insight and end-to-end services to provide loan management software, risk management software, mortgage and loan servicing, standby servicing, and Know Your Customer (KYC).

Built on decades of real world experience at the cutting edge of finance, we're here to help you build a better future.

 lenvi.com



SYSTEMS & SOFTWARE

LexisNexis® Risk Solutions provides customers with innovative technologies, information-based analytics, decisioning tools and data management services across a variety of industries and market sectors and includes our additional lines of business.

Our specialised industry Data Services businesses include ICIS®, Cirium®, Brightmine®, EG™ and Nextens®.

Headquartered in metro Atlanta, Georgia, we are part of the Risk market segment of RELX, a global provider of information and analytics solutions.



risk.lexisnexis.co.uk



LEGAL

For over twenty five years Lightfoots Solicitors have delivered tailored solutions for banks, mortgage lenders and financial institutions across the UK.

We are small enough to give you a totally personalised service but big enough to always have the resource and skill to deliver, and are proud to operate in a way that truly puts our clients first.



lightfoots.co.uk



DEBT PURCHASE / COLLECTION

MFDP is a company that is authorised by the Financial Conduct Authority to purchase debts, in the main, from other regulated firms. We aim to go against the perceived reputation of the debt industry by treating our customers with respect and as the individual that they are.

We understand that everyone's circumstances are unique and that a varied approach is needed for different people which ensures we operate in a fair, transparent and customer focused manner.



mfdp.co.uk



DEBT PURCHASE / COLLECTION

Perch Group, one of the UK's largest full-service debt collection and credit management groups, using data and technology to help customers positively engage and resolve their outstanding debts. Since launching in 2016 Perch has grown to become one of the UK's leading debt collection groups, managing over two million customers with assets under management in excess of £2.5bn.

Every year, we support hundreds of thousands of customers to engage and resolve their outstanding debts by taking an empathetic and customer centric approach to collections.

Perch's platforms provide clients with a one-stop-shop of market-leading, data-led services across the whole debt lifecycle through its integrated group of companies: debt purchaser Perch Capital, customer engagement and resolution agency ACI UK, intelligent field services firm Verify, Solicitors Regulation Authority-regulated law firm TM Legal, and contact centre outsourcing provider Perch Connect.



perchgroup.co.uk



CONSULTANCY

Product Partnerships is a compliance company solely focused on consumer credit. We ensure our clients correctly implement new procedures when regulations change, sales and complaints processes are robust and deliver excellent customer outcomes.

Our approach is bespoke to the needs of each client and whilst we have excellent online compliance systems enabling remote checking of sales and complaints, we can deliver anything from a remote support function through to acting as an in-house compliance function.

Clients can also become a Product Partnerships Appointed Representative giving added protection in maintaining an effective compliance framework.



productpartnerships.com



SYSTEMS & SOFTWARE

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-performance loans and receivables management, data analytics & AI and loan management.



qualco.eu



CONSULTANCY

Redporth is a financial services consultancy, but with some unique differences.

We have built our business around the simple purpose of providing our clients with safety in financial services. In order to deliver on this promise, we have built up a senior team with an unusually broad level of experience across advisory work and resourcing. This experience brings together experience in FCA supervision, legal services, financial services industry and in large-scale financial services consultancies.

This experience results in a range of domestic and international clients from private wealth managers, lenders, brokers, payment services businesses, law firms and other professional services business. We work across most sectors in the financial services industry, with an emphasis on retail finance, motor finance, private wealth, pensions and retail banking. Redporth was set up with the simple promise of offering our clients a no-nonsense approach. We are passionate about providing value for money and have built this into everything that we do.



redporth.com



CONSULTANCY

Square 4 was founded with the vision to support people and businesses to grow and thrive across the evolving spectrum of conduct, financial crime and operational risk. We do this by leveraging technology and expertise to design bespoke solutions across our core service lines of: governance, risk and compliance, fraud and financial crime, technology solutions and people.

We provide an unrivalled level of interaction – service and expertise, supporting firms across a diverse and changing regulated agenda.

We have extensive experience incorporating the 'big four' professional service firms, industry regulators, leadership roles within Global Systemically Important Financial Institutions and other outsourced learning, resourcing and consultancy providers. We combine this with best-in-class technology to support firms to manage regulatory risk, ensuring clients meet the diverse needs of their stakeholders and customers.



square4.com



CREDIT REFERENCE AGENCY

TransUnion is a global information and insights company that makes trust possible in the modern economy, by providing a comprehensive picture of each person so they can be reliably and safely represented in the marketplace. As a result, businesses and consumers can transact with confidence and achieve great things. TransUnion calls this Information for Good®.

TransUnion provides solutions that help create economic opportunity, great experiences and personal empowerment for hundreds of millions of people. In the UK, TransUnion is a leading credit reference agency and offers specialist services in fraud, identity and risk management, automated decisioning and demographics.


transunion.co.uk


SYSTEMS & SOFTWARE

Trustfolio is a leading 'debt-tech' firm founded by top experts from the consumer credit, debt advice, collections, insolvency, and fintech sectors. Our innovative technology and expert team bring a deep understanding of the entire debt lifecycle, enabling creditors to streamline debt and insolvency processes while enhancing collections.

Our digital platform, Trustledger, replaces postal communication between creditors and insolvency practitioners, improving efficiency and decision-making. With a focus on meeting FCA Consumer Duty requirements, creditors benefit from quicker access to IVA documentation, comprehensive MI reporting, and automated voting capabilities.

Trustfolio's platform also supports vulnerable customers, ensuring tailored care, and provides transparency through a digital footprint of all communications. By simplifying the IVA process and offering bespoke solutions, Trustfolio empowers creditors to improve customer outcomes while staying compliant with Consumer Duty standards.


trustfolio.co.uk


LEGAL

Walker Morris is an award-winning law firm providing practical and commercially focussed solutions for consumer, motor, asset, and mortgage finance firms. We work with well-known players, fintechs and start-ups. We also advise lenders, brokers, and debt buyers.

We provide a true end-to-end service. We advise on:

- permissions and authorisations
- financial promotions and marketing
- policies and procedures
- regulatory processes
- documentation (both customer facing documents and wider commercial documents)
- contentious issues (including dealing with technical complaints, and test cases, to the Ombudsman, complex issues before the Court or discussions with a regulator)
- remediation projects.

Our team of experts and former regulators draft innovative products and are at the forefront of product launches and developments. We author practitioner materials. We're embedded in your industry and understand what you do.


walkermorris.co.uk


LEGAL

Established in Glasgow in 1908, Yuill + Kyle is one of Scotland's leading debt recovery and credit control law firms. The firm provides a vast range of tailored debt recovery and credit control facilities to SMEs, small traders, multinational corporations, international banks and debt recovery organisations.

Flexibility is the cornerstone of the firm's operations, enabling them to deal with the particular circumstances of each case in a customised fashion, and its approach is underpinned by rigorous regulatory compliance. Yuill + Kyle also holds four global International Standards Organisation accreditations for Quality Management, Business Continuity, Information Security Management and Environmental Management, ensuring that all of its debt recovery advice is delivered to the highest standards.

In 2017, Yuill + Kyle became part of the MacRoberts Group, allowing them to provide debt recovery services alongside wider and more diverse legal services throughout Scotland and further afield.


yuill-kyle.co.uk



ccta
MAGAZINE

✉ info@ccta.co.uk

🌐 ccta.co.uk

in [linkedin](#)