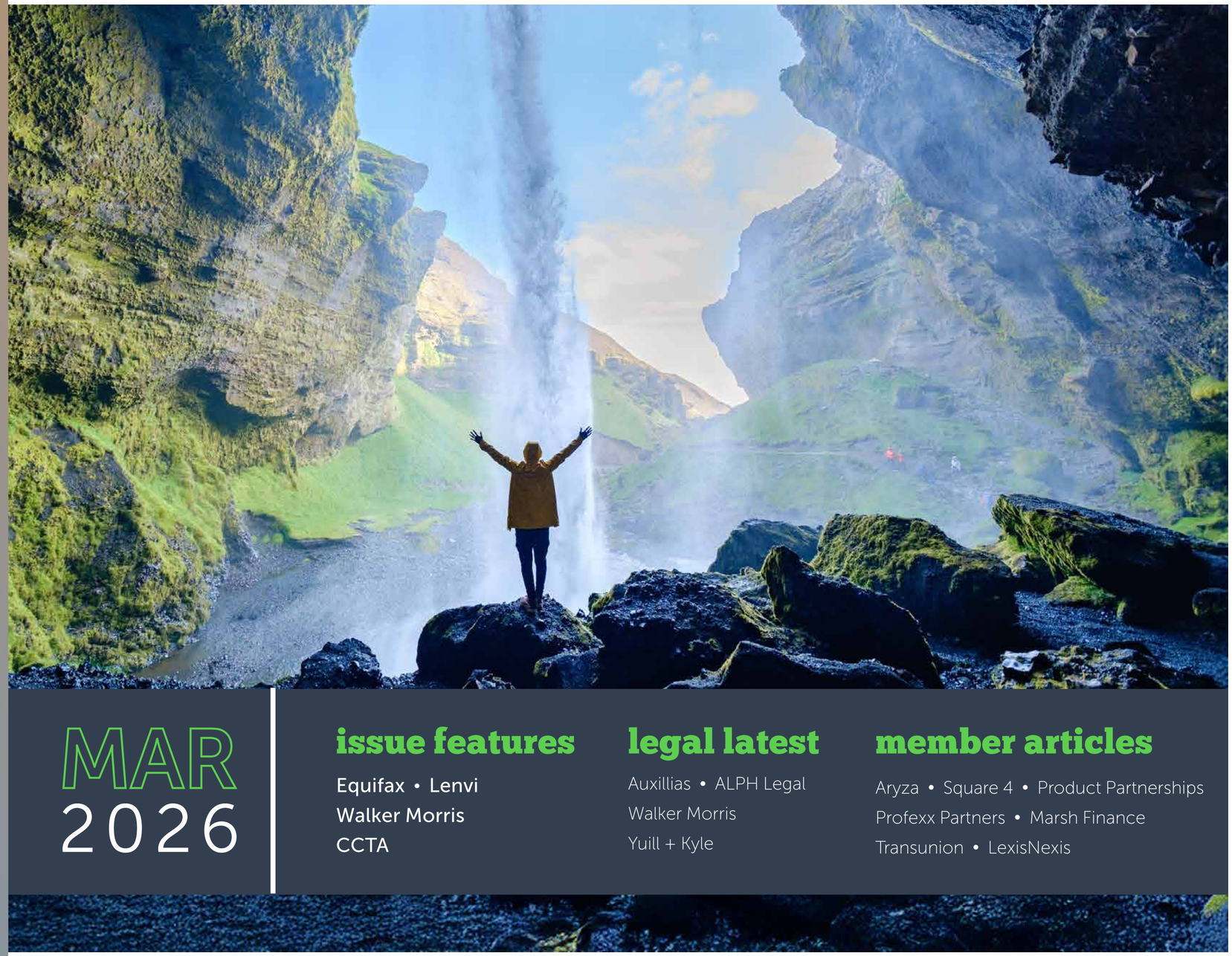
ccta
MAGAZINE





MAR
2026

issue features

Equifax • Lenvi
Walker Morris
CCTA

legal latest

Auxillias • ALPH Legal
Walker Morris
Yuill + Kyle

member articles

Aryza • Square 4 • Product Partnerships
Profexx Partners • Marsh Finance
Transunion • LexisNexis

in this issue



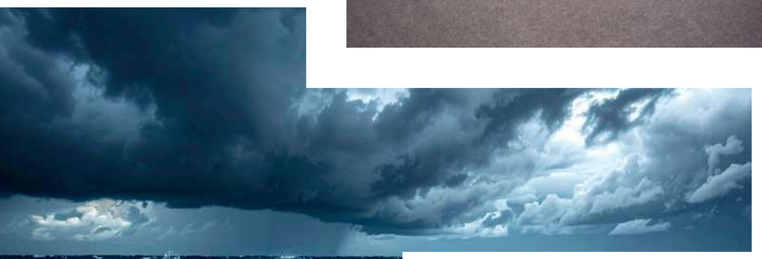
paving the way
credit information reform and the CIGB

p4



06

back to basics
what do the unfair relationship provisions actually say?





a sea change?
the changing landscape of UK politics and why it matters in consumer credit

p8



10

look before you leap
AI in credit decisioning



12

challenging terrain
motor finance redress and appointed representatives consultation



14

mind the (data) gap
redress readiness: are motor finance firms prepared for the challenge ahead?

regulars

03 editor's latest

16 legal latest

25 your ccta

28 member news

30 member articles

39 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

industry events

28 APR
Catalyst
CCTA
London
MORE INFO +

20 MAY
Car Finance Awards
Credit Strategy
Birmingham
MORE INFO +

21 MAY
Commercial Credit & Collections
Credit-Connect
Nottingham
MORE INFO +

23 JUN
Credit Week
Credit Strategy
Newport, Wales
MORE INFO +

06 OCT
2026 Annual Conference
CCTA
Leeds
MORE INFO +



Lucy Donovan
Head of Strategy & Communications
CCTA

editor's letter

Welcome to the first edition of CCTA Magazine for 2026.

The year is shaping up to be another significant one for the consumer credit sector. A combination of major regulatory developments and wider market pressures continues to reshape how firms operate and how consumers access credit. In this edition, we focus on several of the most important areas that will define the months ahead.

BNPL regulation is moving closer, bringing both opportunity and uncertainty. As with previous reforms, the detail of implementation will be critical in determining how well the regime works in practice - for consumers and for firms of all sizes. Alongside this, the ongoing embedding of the Consumer Duty continues to influence decision-making across the market, with firms refining their approaches to outcomes, governance, and evidencing good customer treatment.

Motor finance also remains high on the agenda. With the development of a potential redress scheme, there is a clear need for careful design to ensure that outcomes are fair, proportionate, and deliverable. Look out for articles from Walker Morris, Grant Thornton and Equifax.

As always, we are pleased to include contributions from across the CCTA membership and our associate partners, sharing practical insights on how firms are responding to these developments.

If you would like to contribute to future issues, please get in touch.

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.



Jason Wassell
Chief Executive
CCTA

paving the way

Credit information reform and the CIGB

The UK credit system relies heavily on the effective sharing of information. Every lending decision - whether for a credit card, motor finance agreement or small-sum instalment loan - depends on data flowing through a network of credit reference agencies, lenders and technology providers.

That system has evolved over decades and, in many ways, it works well. But the governance arrangements behind it have struggled to keep pace with a modern, data-driven credit market.

That is the backdrop to the creation of the Credit Information Governance Body (CIGB).

For many lenders, the appearance of another new governance structure may feel like just another acronym in an already complex regulatory landscape. However, the CIGB has the potential to shape how credit data is governed, shared and developed across the UK for years to come.

Why the CIGB has been created

The CIGB is one of the outcomes of the FCA's Credit Information Market Study, which examined how credit data is collected, shared and used across the UK credit market.

The study recognised that credit information is central to responsible lending, fraud prevention and risk management. But it also highlighted weaknesses in how the system is coordinated and governed.

Historically, much of this oversight sat within industry arrangements such as the Steering Committee on Reciprocity (SCOR). While these frameworks have provided stability for many years, the FCA concluded that the governance model needed to evolve to reflect the scale, complexity and importance of modern credit data.

The CIGB is intended to provide a clearer governance structure overseeing the standards and rules that underpin credit information sharing.

In practice, that means a stronger focus on issues such as data quality, consistency and system-wide coordination.

Why proportionality will matter

While the objectives behind the reform are understandable, the way the framework operates will matter enormously.

The UK credit market is not a single, uniform sector. It includes large banks, fintech lenders, credit reference agencies and a wide range of smaller and specialist lenders serving different consumer groups.

Those smaller firms play an important role in serving customers who may not fit standard credit models. But they operate with far fewer compliance and technology resources than the largest institutions.

If governance frameworks are designed around the scale and systems of the biggest firms, there is a risk that reporting expectations, data requirements and cost structures become disproportionately burdensome for the rest of the market.

We have seen similar dynamics emerge in other areas of regulation. Data-heavy reforms can sometimes become an administrative burden, raising barriers to entry and reducing competition. That outcome ultimately risks reducing choice and access to credit for consumers.

What lenders should be doing now

For firms beginning to receive communication about the new framework, the immediate priority is preparation and understanding the practical implications. There are several sensible steps lenders should consider.

1. review all CIGB correspondence carefully

Firms should review CIGB communications and subscription documentation in detail. This includes the terms of the subscription agreement, relevant governance policies and data contract requirements.

Understanding the legal obligations, enforcement mechanisms and operational expectations is essential before committing to the framework.

2. assess the likely cost implications

Lenders should consider where they are likely to sit within the proposed subscription banding structure. This may depend on factors such as group structure, data usage and turnover metrics.

Some firms may also be eligible for fee exemptions or reduced costs, so it is important to understand how these criteria apply.

3. consider internal governance implications

Credit information governance interacts with several areas of regulatory responsibility.

Firms should consider how oversight of credit data fits within their existing governance structures, including:

- board and senior management reporting
- SYSC governance arrangements
- Consumer Duty monitoring and outcome testing
- complaints handling and root-cause analysis

Ensuring that credit data governance is properly integrated into existing oversight processes will help avoid duplication and ensure regulatory expectations are met efficiently.

4. engage with the CCTA early

As the framework develops, practical feedback from lenders will be essential.

Members should contact the CCTA if they have questions or concerns - particularly around proportionality, representation or operational burden. Early engagement allows us to reflect real-world operational impacts in discussions with policymakers and ensure that the interests of smaller lenders remain visible.

A system that works for the whole market

Better governance of credit information has the potential to deliver real benefits. Improved data quality can support more accurate affordability assessments, reduce unnecessary declines and enable lenders to make fairer decisions for consumers. But governance structures must work for the whole market.

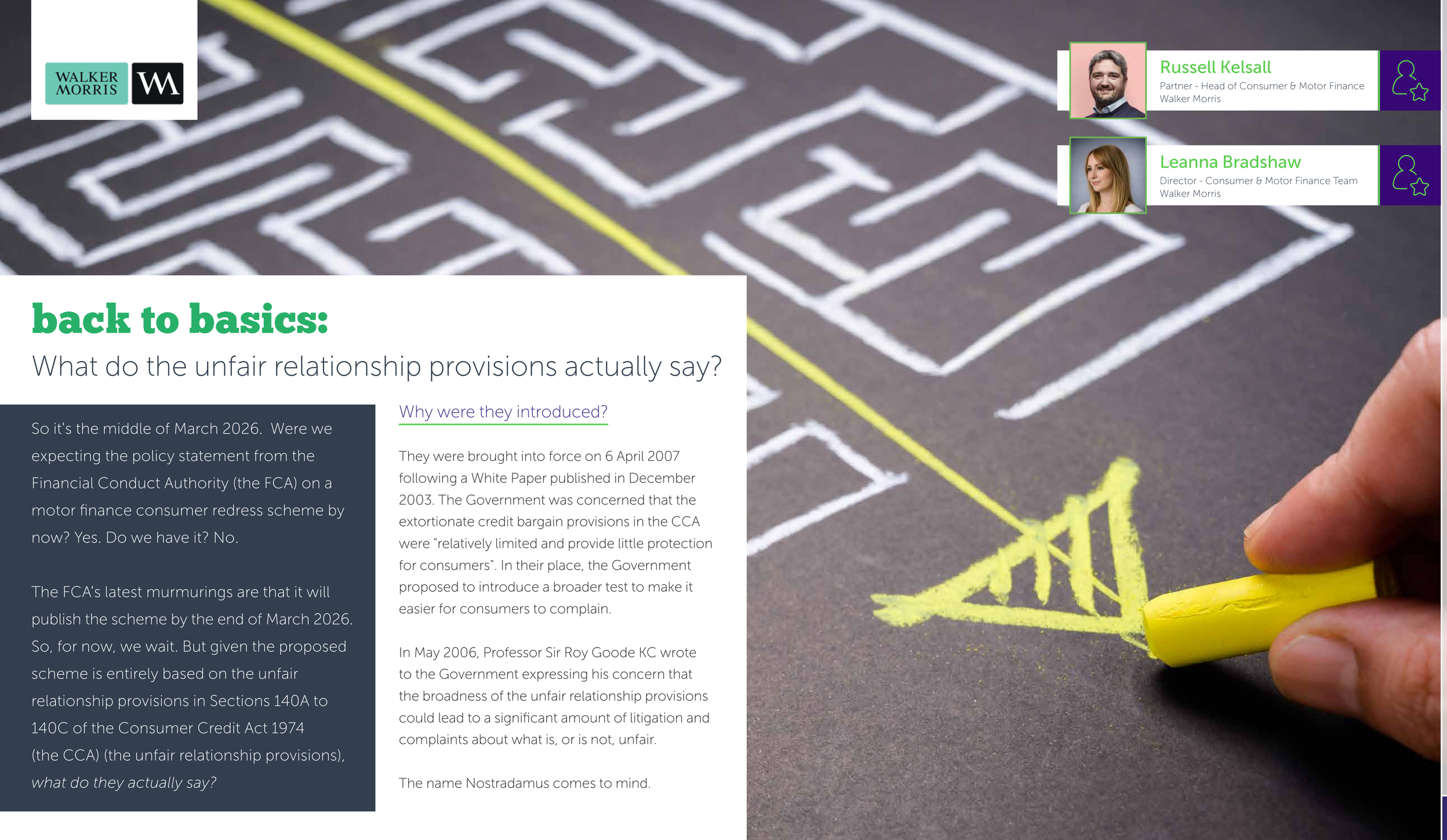
If the new framework becomes overly complex or costly, there is a risk that it unintentionally reduces market participation and lending capacity.

The challenge for the CIGB will therefore be striking the right balance: strengthening the governance of credit information while ensuring that the system remains proportionate, practical and inclusive.

That balance will determine whether the reform genuinely improves outcomes for lenders and consumers alike.

“The challenge for the CIGB will therefore be striking the right balance: strengthening the governance of credit information while ensuring that the system remains proportionate, practical and inclusive.”





Russell Kelsall
Partner - Head of Consumer & Motor Finance
Walker Morris

Leanna Bradshaw
Director - Consumer & Motor Finance Team
Walker Morris

back to basics:

What do the unfair relationship provisions actually say?

So it's the middle of March 2026. Were we expecting the policy statement from the Financial Conduct Authority (the FCA) on a motor finance consumer redress scheme by now? Yes. Do we have it? No.

The FCA's latest murmurings are that it will publish the scheme by the end of March 2026. So, for now, we wait. But given the proposed scheme is entirely based on the unfair relationship provisions in Sections 140A to 140C of the Consumer Credit Act 1974 (the CCA) (the unfair relationship provisions), *what do they actually say?*

Why were they introduced?

They were brought into force on 6 April 2007 following a White Paper published in December 2003. The Government was concerned that the extortionate credit bargain provisions in the CCA were "relatively limited and provide little protection for consumers". In their place, the Government proposed to introduce a broader test to make it easier for consumers to complain.

In May 2006, Professor Sir Roy Goode KC wrote to the Government expressing his concern that the broadness of the unfair relationship provisions could lead to a significant amount of litigation and complaints about what is, or is not, unfair.

The name Nostradamus comes to mind.

What can they look at?

The unfair relationship provisions look at whether the relationship (and not an agreement) arising out of a credit agreement (taken, where relevant, with any related agreement) is unfair to the customer because of one or more of the following factors:

- the terms of the agreement or any related agreement;
- the way in which the lender has enforced or exercised their rights; and
- any other thing done, or not done, by or on behalf of the lender either before or after entering into the agreement.

The customer must prove the facts

Following the Supreme Court's decision in Smith v Royal Bank of Scotland plc [2023] UKSC 34, the position is clear. The customer must both (a) set out the grounds upon which they say the relationship is unfair and (b) prove the facts on which they positively rely. It is only then that the burden of proof moves to the lender to prove the relationship is not unfair.

The fact sensitive assessment

An important feature of the unfair relationship provisions is that they require a fact sensitive assessment of the relationship. What may be fair in one relationship may be unfair in another.

Take the following example: a customer enters into a regulated hire purchase agreement. There's no unusual features. But on page three of the agreement, the agreement sets out (in clear terms) provisions explaining what happens if the customer exceeds a mileage limit. Two customers enter into that agreement: one carefully reads the documentation and is actually a motor finance lawyer who drafts such terms but the other does not bother to read the agreement at all. In the first situation, the Court will be slow to find unfairness but it may be more prepared to do so in the other.

So the same facts can lead to different results. And this is expressly set out in the CCA: Section 140A(2) says the Court must "have regard to all matters it thinks relevant (including matters relating to the creditor and matters relating to the debtor)".

The remedies are broad

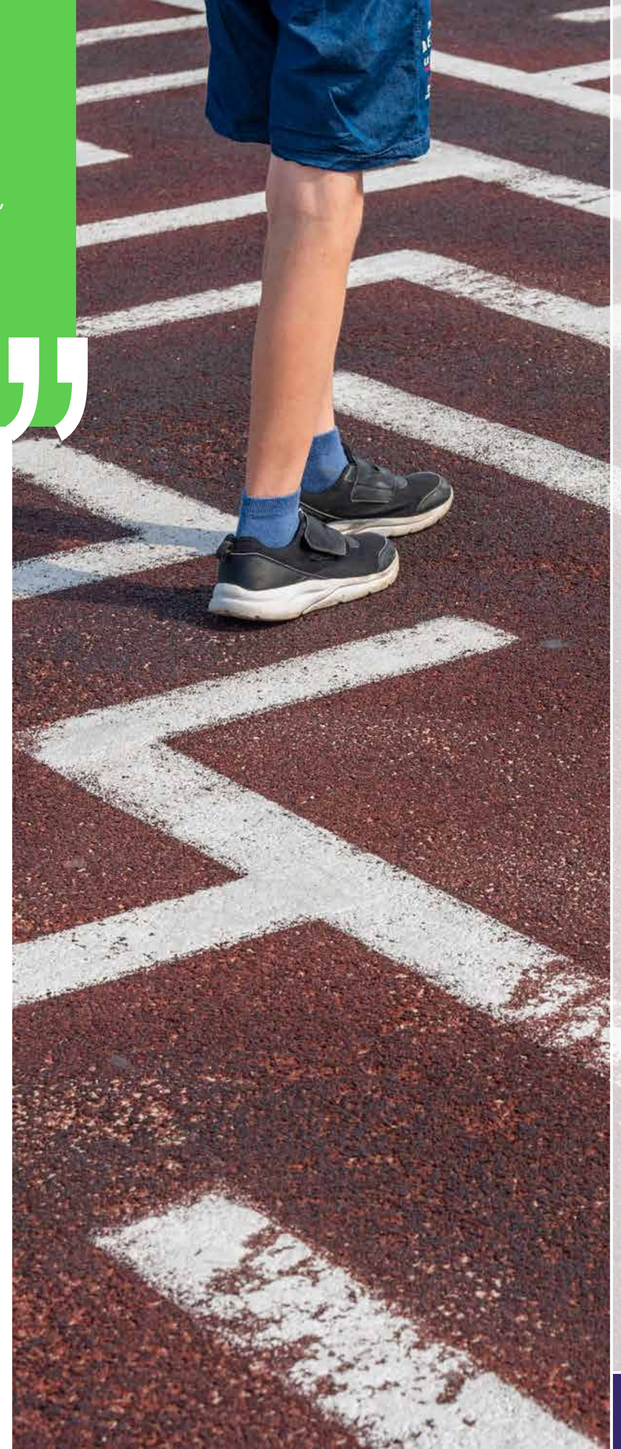
If the Court finds an unfair relationship then Section 140B of the CCA sets out a very broad range of powers to remedy the unfairness. But that does not mean the Court's powers are completely unlimited. The Court must, instead, do the minimum necessary to redress the unfairness. Or, to put it another way, the Court must only award a remedy which is proportionate to the nature and degree of unfairness found (as decided by Patel v Patel [2009] EWHC 3264 (QB)), and must not give the customer a windfall (see Kerrigan & Others v Elevate Credit International Limited t/a Sunny (in administration) [2020] EWHC 2169 (Comm)). Like the approach to unfairness, two cases with the same facts could lead to a different remedy.

> The unfair relationship provisions require the customer to prove the facts, require a fact sensitive approach and allow a flexible approach to remedy.

The motor finance redress scheme

Going back to basics, the unfair relationship provisions require the customer to prove the facts, require a fact sensitive approach and allow a flexible approach to remedy. This is very different from, for example, a breach of contract claim where there is considerably more certainty on whether a claimant will win and, if so, what they will be entitled to.

This puts the FCA into a difficult position when considering a consumer redress scheme which has certainty at its heart. The unfair relationship provisions and a consumer redress scheme are therefore unhappy bedfellows. But, for now, we will need to wait to see if they continue to live unhappily together (subject to any challenge), or whether some compromise will be made by the FCA.



a sea change?

The changing landscape of UK politics and why it matters for consumer credit



Lucy Donovan
Head of Strategy & Communications
CCTA

The UK's political landscape is becoming more fragmented and dynamic. While British politics has historically been dominated by two major parties, recent elections and shifting voter preferences suggest a broader change in the political environment. Alternative political movements are gaining traction, and policy debates are increasingly shaped by issues such as economic fairness, financial resilience and household debt. At the same time, parliamentary activity - particularly among Labour backbench MPs - is bringing renewed attention to the area of financial inclusion.

These developments matter for the UK consumer credit market because political priorities shape the regulatory framework governing how credit is provided, who can access it, and how consumers are protected.

Populist and alternative political movements

One of the most notable shifts in UK politics is the rise of political movements that challenge the traditional dominance of the major parties. These include both left and right-leaning populist parties that are influencing the policy agenda.

On the right, Reform UK has emerged as a disruptive electoral force. Originating from the Brexit movement, the party has broadened its policy platform to include tax reductions, deregulation and institutional reform. Its messaging frequently focuses on reducing bureaucracy, stimulating economic growth and challenging what it describes as an entrenched political establishment.

At the same time, progressive and issue-focused movements are becoming more visible in political debate. Among the most prominent is the Green Party, bolstered by its recent by-election success, which has expanded its presence in local government and increased its influence in national political discussions.

Although best known for its environmental policies, the Green Party has increasingly focused on economic resilience and financial fairness. Its policy proposals include greater support for credit unions and community banking, and closer scrutiny of household debt levels.

While smaller parties such as Reform or the Greens do not directly shape national financial regulation in the same way as governing parties, they can



> Political priorities will shape the future regulatory environment for lenders.

influence the wider policy conversation. Larger parties often respond to emerging political pressures by adopting or adapting elements of smaller parties' policy agendas. It also introduces new voices into the debate.

Labour backbench activity on **financial inclusion**

Developments within the Labour Party are also shaping the policy environment for financial services.

Labour backbench MPs have become increasingly active in raising concerns about financial inclusion - the challenge of ensuring that individuals and households have access to affordable financial services such as banking, credit and savings products. Through parliamentary debates and committee work, MPs have highlighted the difficulties faced by households that struggle to access mainstream credit.

Several issues have been raised repeatedly in Parliament. These include the rapid expansion of Buy-now Pay-later products and inequalities in access to financial services. Many MPs argue that millions of households remain financially vulnerable, lacking sufficient savings buffers and facing barriers when trying to access affordable credit.

Policy ideas discussed in Parliament include strengthening credit unions, improving transparency in bank lending to underserved communities and expanding financial education initiatives. There have also been discussions about whether the UK should adopt policy approaches like the US Community Reinvestment Act, which encourages banks to support lending in underserved areas.

Although backbench MPs do not directly set government policy, sustained parliamentary pressure can influence the policy agenda and shape future regulatory reviews.

Why this matters

The consumer credit market operates within a framework defined by political and regulatory decisions.

Political priorities will shape the future regulatory environment for lenders. If financial inclusion becomes a central policy focus, regulators may introduce stricter affordability requirements, stronger consumer protections and greater oversight of high-cost lending products.

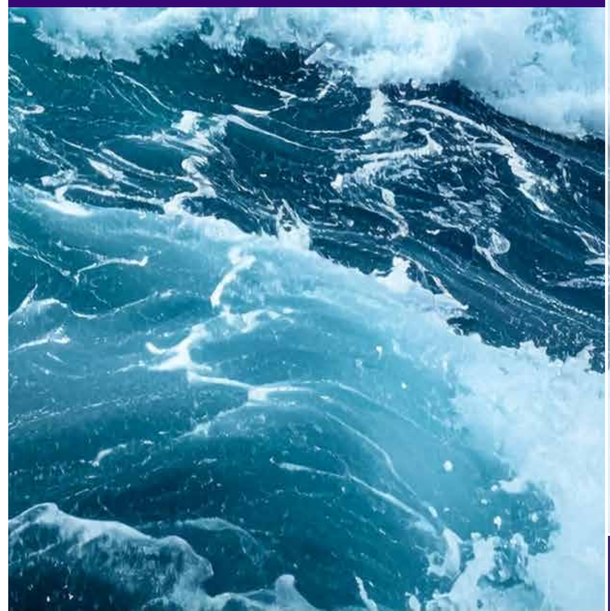
The emergence of new political forces also introduces greater policy uncertainty. A more fragmented political environment can produce competing visions for financial regulation, making it harder for lenders to predict the long-term direction of policy.

This uncertainty can influence investment decisions, funding costs and ultimately the price and availability of credit.

Conclusion

Changes in the UK's political landscape are increasingly relevant to the consumer credit sector. The rise of populist and alternative political movements, the growing influence of the Green Party and the activism of Labour backbench MPs all reflect wider concerns about economic fairness and financial resilience.

For lenders, these developments point to a potentially evolving regulatory environment. For consumers, they will influence the availability, affordability and fairness of credit products. As debates around financial inclusion and economic reform continue to develop, the consumer credit market will remain closely connected to the direction of UK politics and the priorities of policymakers.





Martin Kisby
Chief Compliance Officer
Lenvi

look before you leap

AI in credit decisioning

Lenvi

The **FCA's Mills Review** arrives at a pivotal moment, asking not whether AI belongs in retail finance, but how we, as regulated firms and technology partners, can integrate it safely and transparently within established frameworks.

The FCA's position - that existing rules are sufficient if applied rigorously - carries real weight for those of us designing the next generation of credit and risk systems. It reinforces the need to embed governance, auditability, and fairness into AI solutions from the ground up, not retrofitted after deployment.

In credit decisioning, AI is shifting from an efficiency tool to a structural component of decision infrastructure. Yet its long-term implications for fairness, bias, and accountability remain unsettled.

The Mills Review represents a valuable chance to align innovation with regulatory clarity, ensuring that automation enhances rather than complicates our duty to customers.

Clarifications we are seeking from the Mills Review

These clarifications would help firms and consumers:

1. Best practice for AI transparency in credit

Provide a model notice that meets expectations (logic, data sources, human review rights) and dovetails with the Consumer Duty's "customer understanding" outcome - so firms can standardise disclosures without dumbing them down.

2. Minimum expectations for intervention

Set clear rules for when a real person must step in to review credit refusals, credit limit reductions, and debt-related actions - especially when there are signs the customer may be vulnerable.

3. Operational resilience for AI supply chains

Re-emphasise the expectations on cloud concentration, audit rights, data residency/transfers, and exit plans for AI tooling and models so that boards can evidence control over third-party AI and model hosting.

Why we believe this clarification is necessary ...

The compliance upsides of AI use

AI is already delivering benefits across the credit lifecycle. In AML/KYC, AI-assisted identity verification and anomaly detection are becoming more accurate and scalable, supporting faster onboarding, consistent screening, and earlier detection of complex financial-crime patterns.

All without requiring proportionately greater resource.

AI is also transforming quality assurance. Rather than relying on manual sampling, AI can review all relevant calls and interactions - enabling faster thematic analysis and giving compliance a fuller view of customer understanding and agent conduct.
The FCA has stressed that boards must use data to evidence outcomes and respond to emerging harms; AI-driven QA strengthens a firm's ability to do so.

Beyond monitoring, AI improves efficiency and standardisation. Automated affordability assessments and policy-driven decisioning can reduce inconsistencies - demonstrating fair value and helping firms avoid foreseeable harm.

By reducing decision variance, AI supports more transparent, repeatable and auditable credit outcomes – all vital in an environment focused on fairness and accountability.

Risks to address head-on

Despite its benefits, AI also brings risks that require active management.

- **Transparency.** UK data protection law requires firms to tell customers when automated decision-making is used, explain the logic in accessible terms, and provide clear routes to human intervention and challenge - particularly where decisions have legal or similarly significant effects (e.g., credit approvals).

- **Automation.** Where a human underwriter might explore fluctuations in spending or probe unusual activity, a model may simply decline an application - reinforcing thin-file disadvantages and denying customers the chance to provide context. As the industry adopts more sophisticated AI, one principle must remain non-negotiable: customers must be able to speak to a human where a decision is complex or sensitive.

- **Cross-border processing.** Many AI models depend on cloud infrastructure hosted outside the UK, raising questions about how outsourcing, operational resilience, and data-location rules apply when AI supports critical decisioning.

- **Accountability.** Current SM&CR rules establish that responsibility cannot be delegated to an algorithm - but as AI models become more autonomous, it is increasingly unclear how senior managers should evidence "effective oversight" of complex AI/ML systems.

- **Vulnerability & Consumer Duty.** The Consumer Duty increases the standard of care owed to customers, with heightened expectations for vulnerable customers. AI introduces two particular tensions:

  1. If eligibility criteria are overly rigid, AI may exclude customers who could manage products - contradicting the Consumer Duty's goal of enabling positive outcomes.

  2. AI can spot warning signs, but judging vulnerability still needs a person to listen, ask appropriate questions and apply judgement.

The FCA's guidance is clear on this matter - firms must avoid foreseeable harm and provide channels that secure good outcomes for vulnerable consumers. Could over-automation undermine this?

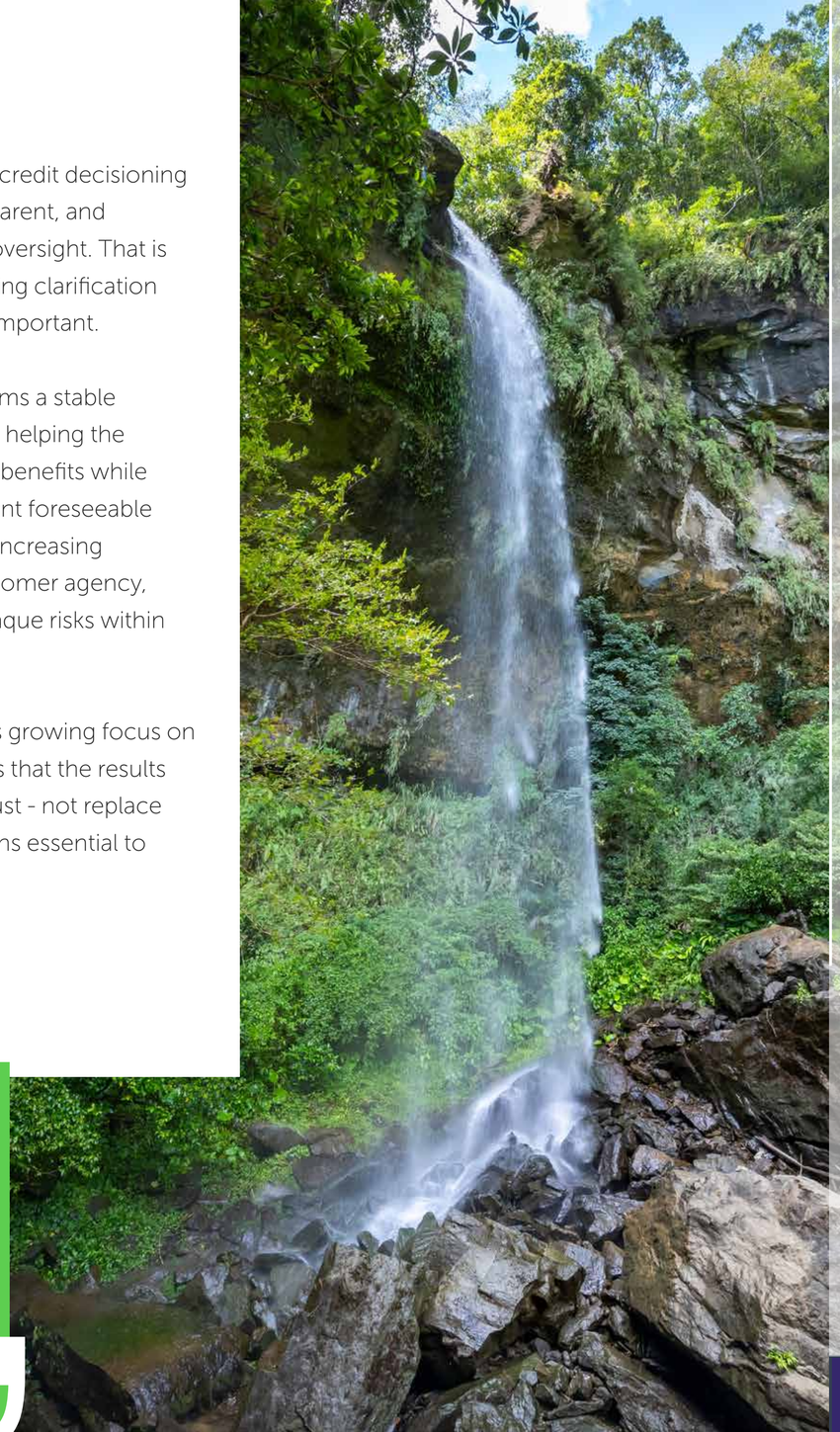
Concluding thoughts

AI has clear potential to enhance credit decisioning - but only if the adoption is transparent, and grounded in meaningful human oversight. That is why the areas where we are seeking clarification from the Mills Review remain so important.

These clarifications would give firms a stable foundation on which to innovate, helping the industry lean confidently into AI's benefits while introducing safeguards that prevent foreseeable harm. In particular, ensuring that increasing automation does not reduce customer agency, undermine fairness, or create opaque risks within complex ecosystems.

The Mills Review signals the FCA's growing focus on real-world outcomes. Our hope is that the results expand access and strengthen trust - not replace the human judgement that remains essential to responsible lending.

> AI has clear potential to enhance credit decisioning
> **- but only if the adoption is transparent,**
> **and grounded in meaningful human oversight.**





Naveed Asif
Head of Policy & Advice
CCTA

challenging terrain

MOTOR FINANCE REDRESS AND THE APPOINTED REPRESENTATIVES CONSULTATION

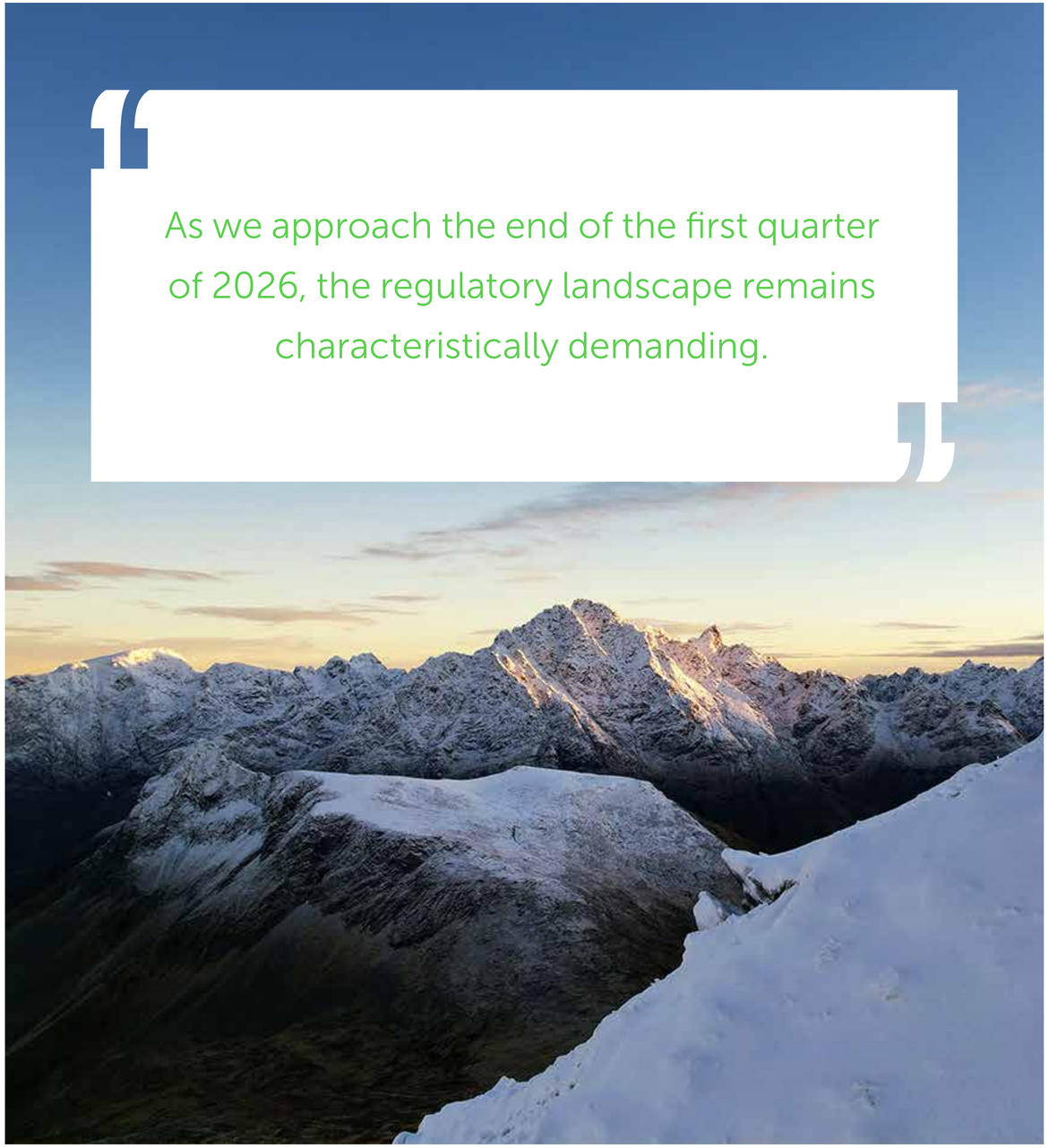
As we approach the end of the first quarter of 2026, the regulatory landscape remains characteristically demanding. Members are navigating a range of initiatives relevant to their sectors, but I would like to highlight two particularly significant matters that the CCTA is actively addressing.

Motor finance **redress scheme**

The first is the forthcoming Financial Conduct Authority (FCA) redress scheme on motor finance commissions. It is now over two years since the FCA intervened, pausing commission complaint handling while it reviewed the use of discretionary commission arrangements. Subsequent court judgments and the FCA's consultation on redress have had substantial implications across the sector. The next milestone is imminent, with the finalised redress scheme expected shortly.

Throughout this process, we have advocated for rules that are fair and proportionate for both lenders and consumers, and that address actual harm. Our representations have focused on several key areas: the overall scope of the scheme, the proposed communication strategy for lenders, the absence of an adequate implementation period, and the impact of FOS case fees on smaller members.

An appropriate implementation period is essential to ensure firms are properly prepared, consumers receive good outcomes, and redress is administered effectively, minimising wider disruption to lenders and the market. Similarly, consumer communications must be proportionate, avoiding unduly burdensome practices and significant cost implications.



> As we approach the end of the first quarter of 2026, the regulatory landscape remains characteristically demanding.

It was therefore reassuring to see the FCA's update on the motor finance redress scheme published last month. The regulator confirmed it would allow an implementation period for lenders and provided greater flexibility on communication methods, moving away from a requirement for recorded delivery letters only.

While these developments are welcome, we continue to engage with the FCA on the scope of the scheme and proposed remedies. We are also in ongoing discussions with the FOS regarding the impact of case fees on smaller member firms, particularly where complaints have no redress liability or no reasonable prospect of success.

We will host a motor finance roundtable shortly after the scheme rules are published. In the meantime, member insights remain invaluable - please continue to share your experiences.

Appointed Representatives **regime consultation**

The second matter I wish to address is the Appointed Representatives (AR) consultation. HM Treasury published its proposals in February, setting out legislative reforms to the AR regime. The government's primary objective is to address identified risks of consumer harm while preserving the regime's benefits, including competition, innovation, and growth.

These proposals carry important implications for members who are principal firms, AR firms, or those considering either role in the future.

A key proposal is the introduction of a new FCA permission for firms wishing to become principals. While this does not immediately affect existing principals, the Treasury's intention is to enable the FCA to scrutinise firms upfront, ensuring they possess the necessary expertise, resources, and systems to provide effective oversight of ARs.

Another significant proposal is to extend the jurisdiction of the FOS to ARs. Currently, consumers may only complain to the FOS about an authorised firm. Where a principal is found not to be responsible for an issue caused directly by its AR, no FOS redress route exists against the AR. Extending the FOS's jurisdiction would allow consumers to bring complaints directly relating to ARs.

The proposals also seek to rationalise the conduct and fitness and propriety frameworks, aligning standards for ARs more closely with those for authorised firms. This is intended to empower the FCA to reduce administrative burdens where appropriate, while maintaining high standards of conduct and accountability.

Ongoing engagement

These are just two of the key regulatory initiatives currently shaping the consumer credit market. The CCTA continues to work across all fronts to ensure members' interests are represented. As ever, your insights and experiences are vital to informing our advocacy - please do share them with us.

Mind the (data) gap

Redress readiness: Are motor finance firms prepared for the challenge ahead?



Matt Wallis
Solutions Design Consultant
Equifax

The regulatory landscape for motor finance is shifting rapidly. Following the Financial Conduct Authority's (FCA) latest update on 4 March 2026, the industry now has a much clearer view of the road ahead. With final rules expected in late March, the focus has shifted from hypothetical planning to urgent operational implementation.

The FCA's stated goal is to "streamline" the process, ensuring millions of consumers receive compensation within 2026. For lenders, this means the window to prepare for a high-volume, high-velocity redress event could be closing fast.

The new regulatory timeline

The FCA has signalled a pragmatic approach to the scheme's rollout, proposing a three-month implementation period, extending to five months for older agreements. While this provides a brief buffer, the regulator's intent is clear: firms should be ready to process claims as soon as possible.

A significant change in the latest guidance is the removal of the 'opt-out' requirement for people who complain before the scheme starts. Instead, lenders are likely to be expected to proactively inform consumers of their eligibility and compensation amounts within three months of the implementation period ending. This shift places an even greater emphasis on a lender's ability to quickly and accurately reconcile historical data.

Bridging the data gap

The "streamlined" journey envisioned by the FCA relies heavily on data certainty. However, the proposed look-back period (dating back to 2007) remains a significant hurdle. For many firms, the challenge is twofold: missing historical agreement data and outdated customer contact details.

The FCA estimates that approximately 14 million agreements could be affected. With a significant portion of these dating back nearly two decades, many consumers could lack the necessary paperwork to make a specific redress enquiry. This could lead to a "flood of vague consumer queries" that overwhelms manual operations.

Furthermore, Equifax research indicates that up to 47% of consumers who took out motor finance in 2007 no longer reside at the same address, complicating the FCA's requirement for proactive outreach.

Strategic imperatives for redress readiness

To help meet the FCA's expectations for a smooth operation and to support a streamlined consumer journey, lenders should consider focusing on three core pillars:

1. Reconstructing legacy records

Lenders should leverage comprehensive, historical motor finance data to plug gaps in their own systems, ensuring they can validate agreements and calculate redress accurately across the entire look-back period.

2. Precision tracing and outreach

The FCA has moved away from requiring recorded delivery, allowing for digital channels that *"best meet consumers' needs."* To utilise these efficiently, lenders need robust tracing capabilities to reaffirm old addresses and secure up-to-date digital contact information.

3. Mitigate fraud risk in a digital journey

As the process becomes more automated and digital, the risk of fraud increases. Robust ID verification is essential to ensure that "streamlined" payments reach the legitimate claimant and not bad actors.

Empowering consumers: The MyEquifax solution

The FCA continues to advise consumers that there is no need to use claims management companies (CMCs). At Equifax, we are able to support this *"direct-to-lender"* model through the MyEquifax Car Finance Checker App.

Our app offers consumers a free, impartial, and "paperwork-free" way to access their motor finance history in seconds. We also offer a range of secure verification methods to help consumers retrieve key motor finance agreement information.

For lenders, consumers using this tool could also serve to enhance your redress process:

- **Higher quality enquiries:** Consumers will be able to provide specific account details, helping you minimise time wasted on vague information and enabling quicker claim triaging and resolution.
- **Direct communication:** The app empowers consumers to interact with you directly, fulfilling the FCA's goal of a more cost-effective redress process for them.
- **Reliable claims support resource:** Refer customers to our free app to enable them to view their agreements, especially for those convinced they had a claim you cannot find.

How Equifax can help

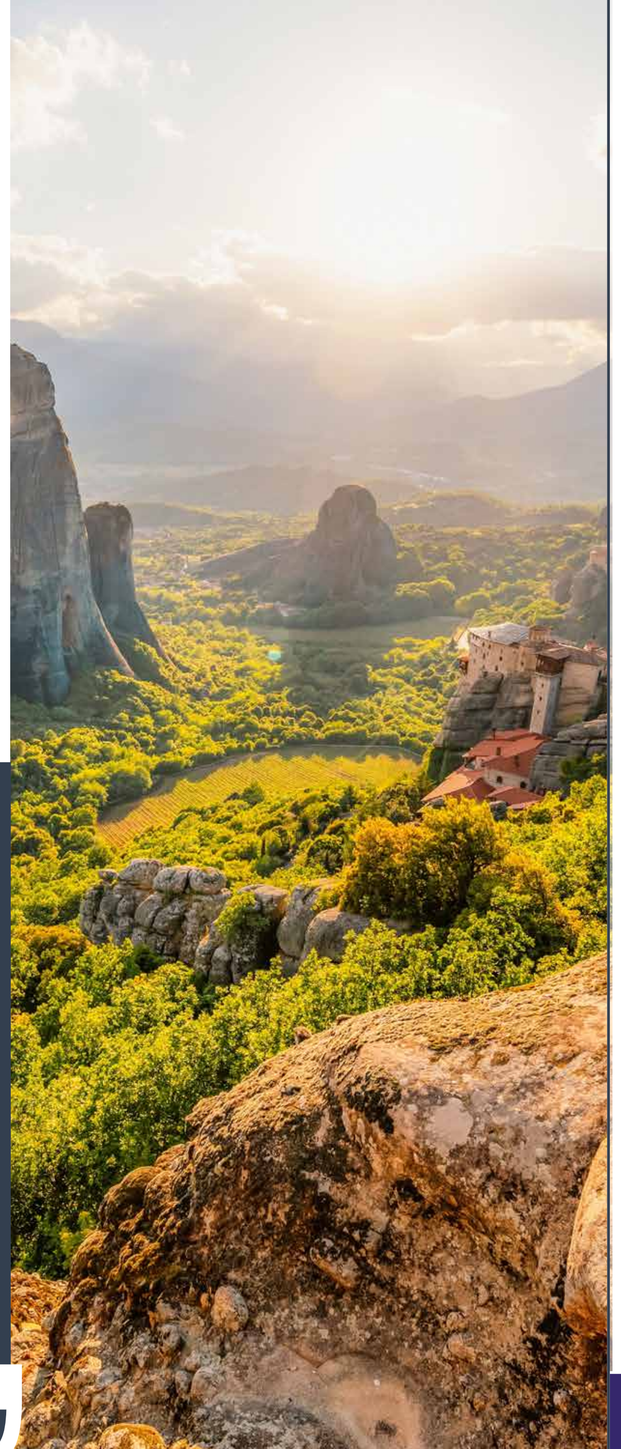
The FCA's recent updates emphasise a desire for speed and efficiency, but that is only possible if the underlying data is sound. Equifax can assist by:

- Rebuilding records and plugging data gaps using our database of 35 million accounts to ensure you only pay out on accurate, validated records.
- Mitigating the risk of fraud and helping to ensure claimants are legitimate.
- Finding millions of affected customers who have moved and providing up-to-date digital contact information to help satisfy the FCA's requirement for proactive contact.
- Helping you manage the workflow of consumer-shared data by implementing a digital-first automated process.

Join our webinar for the latest information

Join us and CCTA us on 1 April for a deep dive into the latest regulatory requirements. We'll discuss the practical implications of the implementation period, strategies for proactive outreach, and provide a live demonstration of the MyEquifax Car Finance Checker app. **Register your interest here**.

> The proposed look-back period (dating back to 2007) remains a significant hurdle. For many firms, the challenge is twofold: missing historical agreement data and outdated customer contact details.



not fit for purpose

Does a manufacturer's recall mean a vehicle was unsatisfactory when supplied?



Paula Twist
Senior Associate
Walker Morris

Jessica Suggitt
Trainee Solicitor
Walker Morris

WALKER MORRIS

Manufacturer recalls are a familiar feature of the motor traders. For consumers and lenders, there is a difficult question is whether the existence of a recall means the vehicle was of unsatisfactory quality in breach of a term implied by the Consumer Rights Act 2015 (the CRA) at the time of delivery. The short answer is it will depend on the nature and impact of the issue, and the relevant evidence.

How recalls arise and what manufacturers must do

Recalls typically arise when safety or performance related defects are identified. Manufacturers must assess the risk with the Driver and Vehicle Standards Agency. The General Product Safety Regulations 2005 (GPSR) form the regulatory backdrop, requiring producers and distributors to ensure unsafe products are not placed or kept on the market and that consumers are informed of relevant safety issues. Recalls are usually a proactive, precautionary measure and do not, on their own, establish that a vehicle was of unsatisfactory quality. That assessment remains fact sensitive.

The CRA

Section 9 of the CRA implies a term into consumer contracts that goods must be of satisfactory quality at delivery, judged objectively by the 'reasonable person' with regard to description, price and all other relevant circumstances which include safety, durability and freedom from minor defects. For used cars, age and mileage can be taken into consideration and, importantly, the CRA does not demand perfection.

Section 19 of the CRA sets out a consumer's remedies where a vehicle is of unsatisfactory quality: (a) the short term right to reject (usually lasting 30 days) or (b) a right to repair or replacement, and, if that fails, a price reduction or final right to reject.

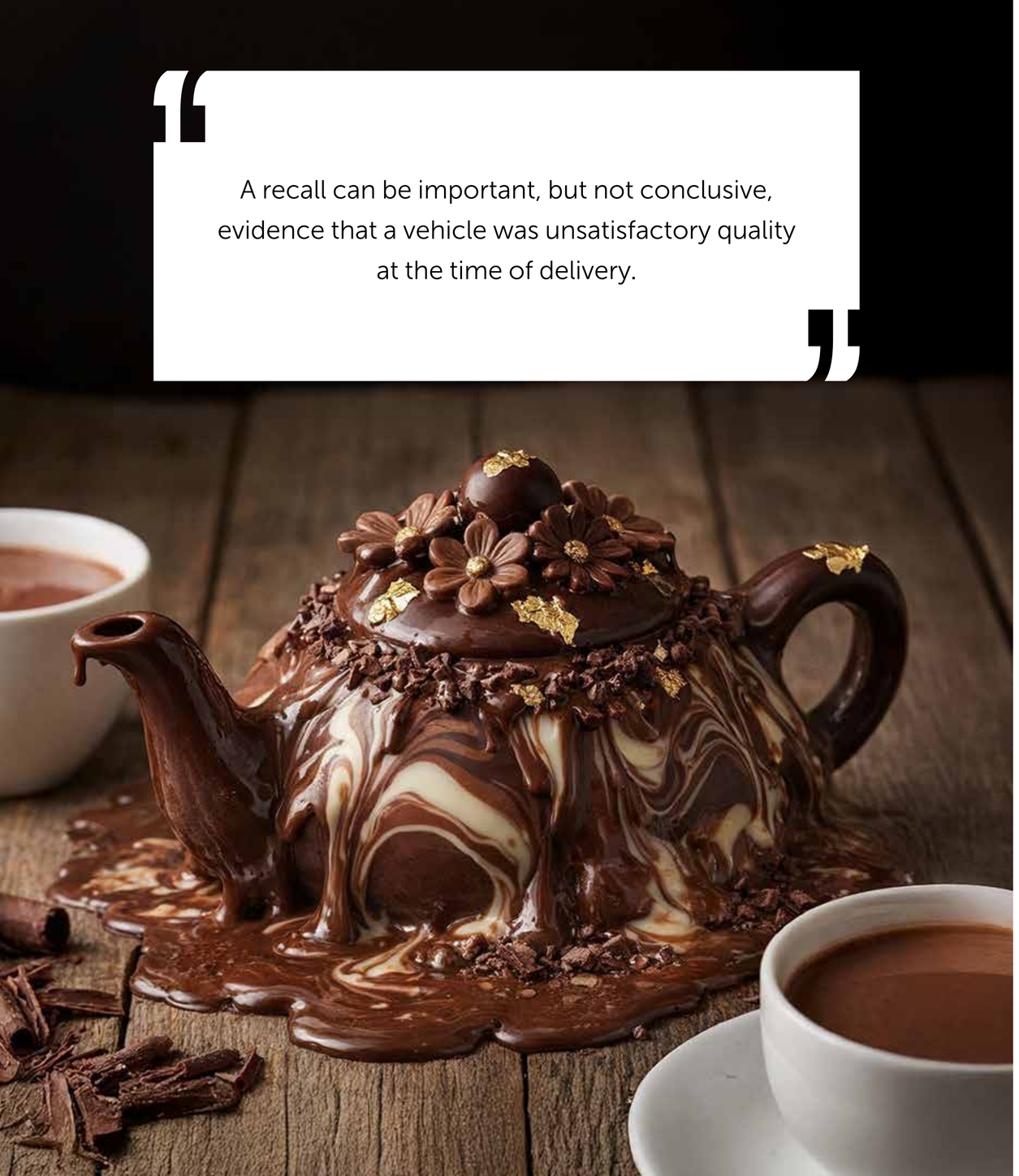
For any fault that appears within the first six months from delivery, the law presumes (unless the consumer is trying to use their 30 day right to reject) that the goods were unsatisfactory quality at the time of delivery, unless the lender can prove otherwise. After six months, that burden shifts to the consumer.

How has the Financial Ombudsman Service (the Ombudsman) treated complaints?

The following decisions show contrasting outcomes:

- In one, a consumer argued a vehicle was unsatisfactory because it was supplied with an outstanding safety recall relating to the exhaust gas recirculation (or ERG) cooler. The lender acknowledged the recall and offered £150 for supplying the vehicle before the recall work was completed. The Ombudsman accepted the GPSR

> A recall can be important, but not conclusive, evidence that a vehicle was unsatisfactory quality at the time of delivery.



was relevant but stressed that an outstanding recall did not prove the component was faulty at supply, or the vehicle was of unsatisfactory quality when supplied. The Ombudsman considered the vehicle's age, high mileage and the chronology of later faults and found the vehicle was of satisfactory quality when supplied. It therefore upheld the lender's offer as fair recognition of the recall handling.

- In another, an electric vehicle was subject to a recall because of a potential fire risk from thermal overload. A software update imposed a charging cap until a long-term fix was found. Despite battery module replacement, the restriction continued and materially impaired the consumer's use. The Ombudsman treated the recall as evidence of a manufacturing defect present or developing from manufacture, and therefore present at supply. Given the safety nature of the risk, the duration of impairment, and the absence of a timely remedy, the Ombudsman decided the vehicle not of satisfactory quality and proposed ending the agreement (with nothing more to pay), refunding the deposit and one month's instalment (plus interest) plus £150 for distress and inconvenience.

These examples show different outcomes turn on seriousness (for example, safety risk compared to a routine fix), persistence, impact on use, timeliness and effectiveness of remedy, set against vehicle age, mileage and the reasonable person benchmark.

Practical points:
What should lenders consider?

- Consider the evidence and not the label: treat the recall notice as a starting point. Obtain recall bulletins, job sheets, timelines and any interim restrictions and consider how these relate to the factors set out in Section 9 of the CRA of safety, durability, functionality, and real world inconvenience.

- Timing matters: consider the time limits in Section 19 and who the burden of proof sits with.

Summary

A recall can be important, but not conclusive, evidence that a vehicle was unsatisfactory quality at the time of delivery. There is no automatic right simply because a vehicle is subject to a recall. The vehicle must still be of unsatisfactory quality when supplied.

The Ombudsman's contrasting decisions underscore the point: a precautionary, swiftly resolved recall on an older, high mileage vehicle may not be unsatisfactory but a safety critical defect that materially restricts use and continues despite attempts to fix could do so. Each case turns on the facts and the reasonable person assessment, and not the fact that a vehicle is subject to a recall.

Consumer Duty 2026:

The FCA's next phase of supervision has begun

The implementation phase of the Consumer Duty is over. What we are seeing now is something more probing, more data-driven and significantly more outcomes-focused.

For consumer credit firms, the message from the Financial Conduct Authority is clear: the FCA is no longer asking whether firms have implemented the Duty, it is asking whether customers are genuinely better off as a result.

This shift marks the beginning of the next supervisory phase which is critical.

From frameworks to evidence

Over the past eighteen months, most firms have invested heavily in policy frameworks, board reports, fair value assessments and training programmes. Those foundations were necessary, but they are no longer sufficient.

Supervisory engagement is increasingly focused on:

- What does your management information actually show?
- Where have outcomes deteriorated, and importantly what did you do about it?
- How are vulnerable customers performing compared to the wider population?
- What changes have you made as a direct result of Consumer Duty monitoring?

In short, the FCA wants proof!

For lenders and brokers, this typically means deeper scrutiny of affordability outcomes, arrears trends, repeat borrowing, complaints root cause analysis and distribution oversight.

Data-led supervision is accelerating

One of the most noticeable developments is the FCA's increasing reliance on regulatory returns and internal MI to target engagement.

CCR data, complaints submissions and product-level information are being used to identify outliers and trends. Firms showing higher arrears rates, elevated complaint uphold rates or disproportionate vulnerability indicators should expect questions.



Matt Green
Senior Compliance Consultant
Alph Legal & Compliance

This does not necessarily imply misconduct. But it does trigger supervisory curiosity - and firms must be prepared to explain and evidence their position.

Boards should therefore assume that the data they submit is actively shaping the regulator's risk assessment. You should be aware that recent supervisory engagement shows the FCA requesting not only Consumer Duty reports and board packs, but also the underlying data and rationale used to assess outcomes, so be prepared!

Fair value under the microscope

Fair value remains one of the FCA's core focus areas. In consumer credit, this extends beyond headline APRs. The regulator is looking at:

- total cost of credit across the lifecycle,
- fees and charges applied in arrears,
- commission structures and distribution incentives,
- and whether specific customer cohorts experience poorer value.

Where firms rely on historic pricing rationales without ongoing reassessment, this presents risk. The FCA expects fair value assessments to be dynamic, data-driven and responsive to changing market conditions.

Vulnerability and customer support

Another key theme emerging in supervision is how firms treat vulnerable customers in practice.

It is no longer enough to have a vulnerability policy. Supervisors are asking:

- How many customers have vulnerability flags?
- What differentiated treatment do they receive?
- Does vulnerability correlate with worse outcomes?
- What changes have been implemented where disparities are identified?

Collections and forbearance processes are particularly sensitive in this regard. Firms unable to demonstrate tailored support and learning from outcomes are increasingly exposed.

Distribution chains and oversight

Consumer Duty has also sharpened expectations around distribution chains.

Lenders remain responsible for customer outcomes even where brokers, introducers or affiliates sit at the front end of the journey. Where complaint patterns, arrears performance or customer misunderstanding appear concentrated in particular channels, the FCA expects intervention.

This is especially relevant in sectors such as motor finance, second charge lending and broker-led unsecured credit. Passive oversight is unlikely to satisfy supervisory scrutiny.

The Board must be able to explain the story

Perhaps the most significant development in 2026 is the FCA's expectation that Boards understand and can clearly articulate their Consumer Duty narrative.

Senior management should be able to explain:

- the firm's target market,
- key outcome metrics,
- areas of concern,
- and what actions have been taken in response.

Minutes and evidence of decision-making matter, the FCA increasingly distinguishes between firms that actively engage with outcome data and those that merely report it and will be requesting evidence of the same.

What firms should be doing now

The priority in 2026 should be moving from compliance assurance to supervisory readiness. This includes:

- stress-testing outcome MI,
- reviewing fair value methodologies,
- conducting end-to-end customer journey audits,
- strengthening oversight of distribution partners,
- and ensuring Boards are actively engaged in challenge and decision-making.

The question firms should be asking is simple:
If the FCA requested detailed evidence tomorrow, would we be comfortable providing it?

ALPH Legal & Compliance support

As the FCA's supervisory intensity increases, firms benefit from independent perspective and structured assurance.

ALPH Legal & Compliance supports consumer credit firms through:

- Consumer Duty outcome testing & MI reviews
- fair value assessments
- pricing governance analysis
- distribution chain & introducer audits
- vulnerability framework reviews
- board-level readiness assessments ahead of supervisory engagement.

The next phase of Consumer Duty is not about rewriting policies. It is about evidencing performance. Visit **ALPH Legal & Compliance** and take control of your compliance future.





Chris Laverty
Head of Financial Services Restructuring
Grant Thornton

Jarred Erceg
Partner, Financial Services Restructuring
Grant Thornton

time for a health check?

Preparing for the FCA's motor finance redress scheme

Following the publication of the FCA's motor finance consultation paper **(CP25/27)** in October 2025 and the consultation closing on 12 December 2025, the regulator has confirmed that it will set out its approach on motor finance redress shortly after markets close on Monday 30 March 2026.

In a previous update on 4 March 2026, the FCA also outlined planned changes intended to streamline the customer journey and simplify implementation of a redress scheme.

Key points included:

- a three-month implementation period, with up to five months for older agreements
- consumers who complain before the scheme starts will no longer be asked to opt out
- consumers can accept redress offers immediately rather than waiting for a final determination
- firms will not be required to use recorded delivery and may communicate via a range of channels.

While these measures may reduce some administrative friction, the scale of potential redress liabilities and the operational effort required to comply remain significant. For many motor finance providers, the proposed scheme represents a material event, one likely to reshape the firm's financial outlook and prompt strategic recalibration.

In this context, now is the time for firms to undertake a comprehensive business health check. This proactive step will help firms understand their resilience, determine whether they can absorb scheme-related obligations and ensure directors are fulfilling their duties during heightened scrutiny.

What is a business health check?

Throughout the lifecycle of any business, periods of stability and growth are impacted by material events, be they regulatory, market-driven or internal factors. A business health check is a forward-looking assessment of a company's capacity to continue operating, meet its financial obligations and remain sustainable over the longer term.

Why is it essential?

It's not simply a financial review. A robust assessment considers liquidity, operational capability, regulatory compliance and strategic flexibility. Done properly, it provides an integrated view of a firm's resilience in the face of uncertainty. Ahead of the proposed scheme, a structured assessment offers multiple benefits:

- **Risk mitigation:** A health check helps identify stresses that could impact liquidity or financial performance. Early detection of vulnerabilities gives firms time to act, including proactive cash management and engaging with key stakeholders

- **Data-driven decision making:** A redress scheme will often reshape what "business as usual" looks like, at least in the short term. A health check provides insight into likely financial and operational impacts, helping management make informed decisions on matters such as staffing, systems and third-party support

- **Strengthening stakeholder confidence:** Boards, capital providers and the regulator expect clarity during periods of turbulence. A well-documented, objective assessment can help secure ongoing support, maintain confidence and demonstrate responsible governance

- **Strategic realignment:** Beyond short-term liquidity considerations, firms must assess whether their operating model remains viable. A health check provides a platform to reassess market positioning, resource allocation and long-term strategy

Key steps of a business health check

Given the potential scale of the FCA's proposed scheme, firms should adopt a systematic approach:

1. Defne the scope & objectives

Clearly articulate the purpose of the assessment, that being to evaluate the financial and operational impact of the scheme on liquidity and longer-term performance.

2. Conduct stress testing

Model "severe but plausible" scenarios for potential redress liabilities and operational costs. Stress testing helps identify trigger points and areas where financial or operational strain may arise.

3. Analyse cash flow & liquidity

Liquidity is essential. Firms must assess whether they have sufficient cash to meet financial obligations as they fall due, including both immediate liquidity needs and longer-term cash flow projections over the life of the scheme

4. Evaluate operational requirements

The scheme will place significant demands on operations. Firms should determine whether current workflows, personnel and technology platforms can support the delivery of the scheme, or whether additional investment or third-party support will be required.

5. Assess regulatory compliance & readiness

With any form of regulatory intervention, ensuring alignment with the FCA's expectations is essential to reducing the risk of future challenge. Firms should be considering internal audits, quality assurance frameworks and governance enhancements to reduce future regulatory risk

6. Identify contingency plans

If the assessment highlights viability concerns, management should identify mitigating options, such as capital injection, cost rationalisation or a restructuring exercise.

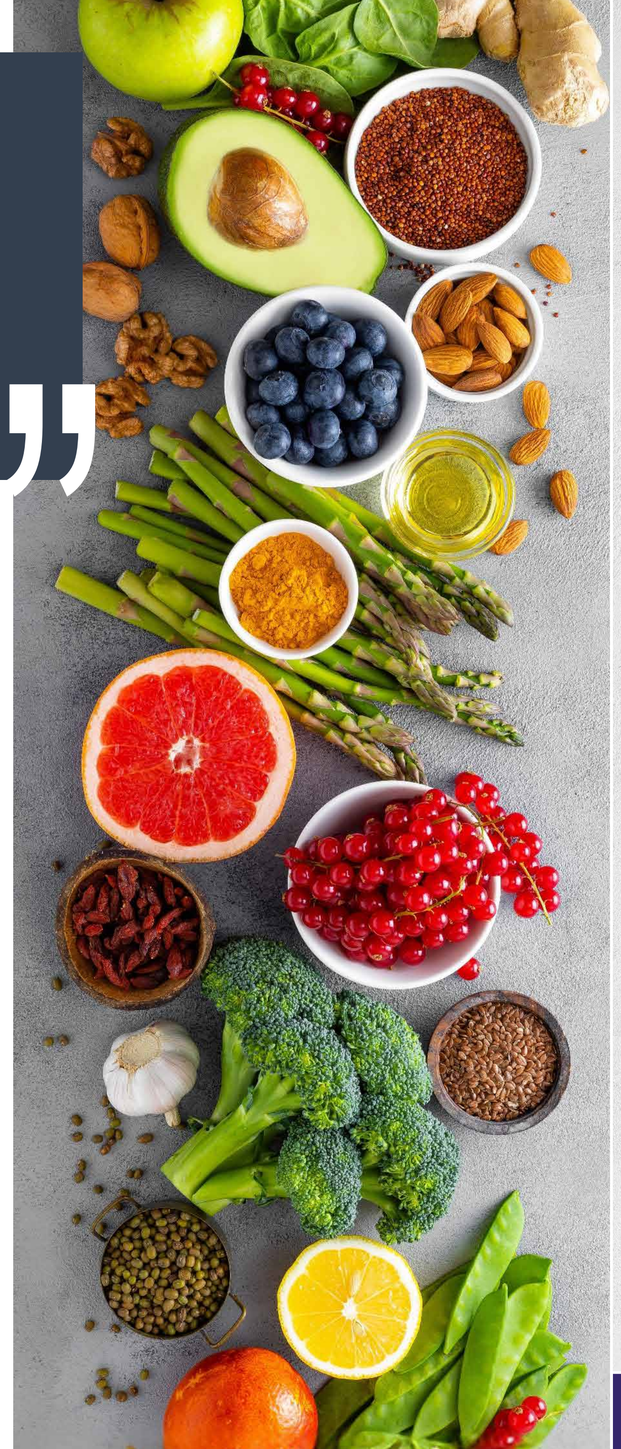
> A robust assessment considers liquidity, operational capability, regulatory compliance and strategic flexibility.

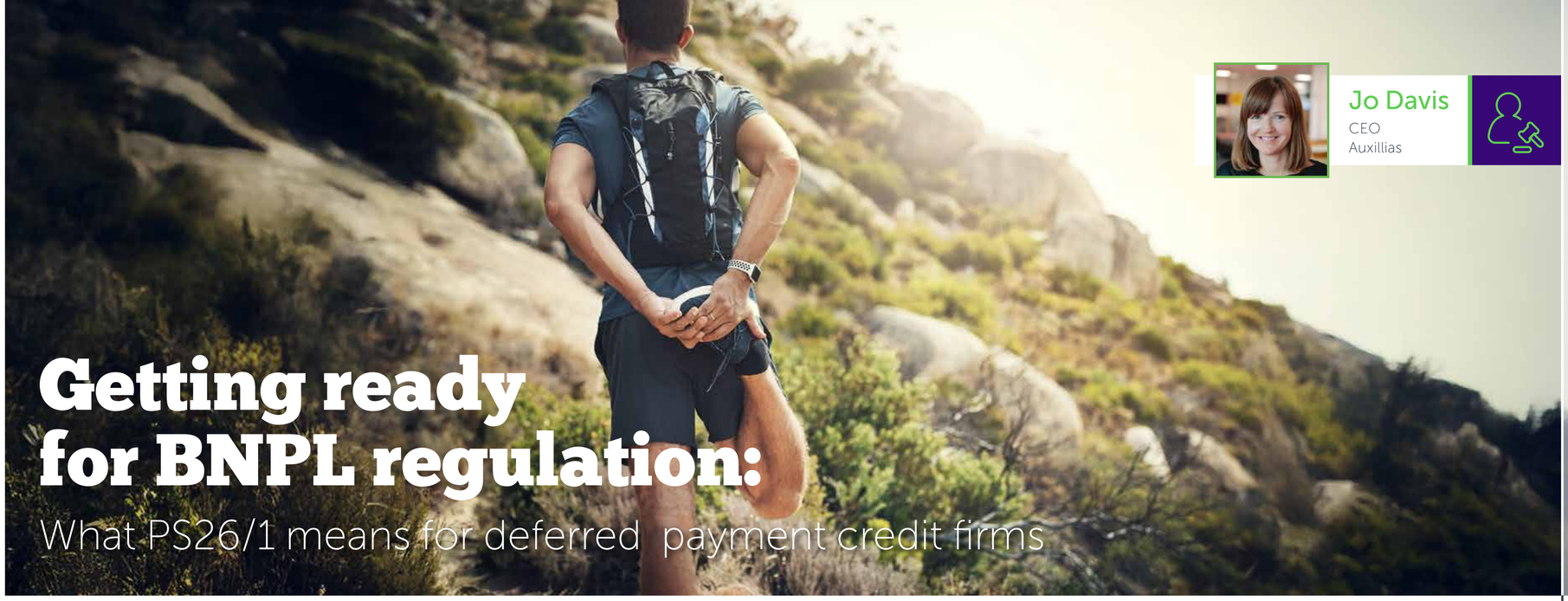
Management should consolidate findings, capturing assumptions, risks and recommended actions. From a governance standpoint, it is essential that all key strategic, operational and financial decisions are well-documented.

Conclusion

The FCA's proposed industry-wide redress scheme represents a pivotal moment for the motor finance sector. While the latest announcement offers further insight into the scheme's design, the financial and operational burden on firms is likely to be significant.

Conducting a business health check now is not only prudent but essential. It enables firms to anticipate challenges, strengthen resilience and demonstrate strong governance. For directors, it is also a critical tool in meeting their statutory duties and safeguarding the long-term sustainability of the business during a period of industry turbulence.





Getting ready for BNPL regulation:

What PS26/1 means for deferred payment credit firms

Jo Davis
CEO
Auxillias

Auxillias

BNPL regulation has been talked about for years. PS26/1 now sets out the rules and expectations clearly. For firms operating in this market, preparation cannot wait until the new rules take effect in July 2026, explains Jo Davis, CEO of Auxillias.

Until now most deferred payment credit (DPC) agreements have operated under an exemption from regulation. That will change when the new regime comes into force. From regulation day (15 July 2026), lenders offering DPC will need FCA authorisation or to enter the temporary permissions regime if they wish to continue providing new agreements.

The changes go well beyond authorisation. The FCA has set expectations around how these products are designed, the information customers receive, how affordability is assessed and how missed payments are handled. Firms will also need governance and oversight that allows boards to demonstrate compliance with the Consumer Duty.

Scope of the new regime

DPC is now defined as interest-free credit used to finance goods or services, repayable in twelve or fewer instalments within twelve months. The FCA estimates the market has increased from around £60 million in 2017 to more than £13 billion in 2024, with around 20% of UK adults using DPC in the year to May 2024.

From July 2026, DPC lending and credit broking will fall within the regulatory perimeter. Firms carrying out these activities will need the appropriate permissions or must enter the temporary permissions regime to continue lending.

Merchants that broker DPC products will remain exempt from regulation in most cases, including domestic premises suppliers. This represents a change from earlier proposals that suggested these firms might be brought into scope.

The FCA believes regulation is justified given the size of the market and the potential risks to consumers. Its analysis suggests DPC users are more likely to experience financial difficulty than the wider population and may not always receive sufficient information or affordability checks under the current model.

Regulatory approach and Consumer Duty

The FCA has framed the regime around its existing objectives of consumer protection and competition. The aim is to give customers clearer information about DPC products and allow easier comparison with other forms of credit.

The Consumer Duty will be central to the new framework. Rather than introducing entirely new conduct standards, the FCA intends to rely on Duty outcomes around consumer understanding and support, with targeted rules added where needed.

The regulator also accepts the changes may reduce some levels of borrowing, particularly where stronger creditworthiness checks prevent unsustainable lending. In the FCA's view this supports a healthier and more sustainable market.

Customer information and disclosures

The new rules introduce clearer requirements for the information customers must receive before entering a DPC agreement.

Firms will need to provide key product information prominently before the agreement is made.

This includes the amount of credit, repayment schedule, the cash price of the goods or services and the main risks or obligations attached to the product. Firms must also say whether credit reference agency information may be used in the assessment process.

Additional information must also be provided or made available before the agreement. This includes details about cancellation rights, complaint routes to the Financial Ombudsman Service and explanations of continuous payment authorities.

Customers must also receive the agreement and related information in a durable medium once the contract is completed.

Missed payments and arrears handling

The FCA has also introduced clearer expectations for dealing with missed payments. Firms must contact customers promptly when a payment is missed and explain the amount outstanding, any fees and potential consequences.

Customers should also receive notice before an agreement is terminated, early repayment is demanded or enforcement action is taken. Communications should identify the relevant agreement, explain the sums due and outline steps the customer can take to avoid further problems.

The regulator links these expectations to existing CONC arrears provisions and Consumer Duty requirements. Firms are expected to provide information that reflects customer circumstances rather than relying on generic notices.

Creditworthiness and affordability

One of the most significant operational changes is the application of existing CONC creditworthiness rules to DPC agreements, including those below £50.

Firms will need to conduct proportionate assessments before entering each agreement. These checks must consider both the credit risk to the firm and the affordability risk to the customer.

For many providers this represents a major change, particularly where current processes involve limited affordability checks for smaller purchases. Firms will need documented creditworthiness policies and governance processes that allow boards to monitor approval rates, repeat borrowing and arrears outcomes.

Authorisations and transition

Firms that do not already hold the required consumer credit permissions must apply for authorisation or enter the temporary permissions regime if they wish to continue offering DPC agreements after July 2026.

The TPR notification window opens on 15 May 2026. Firms that fail to enter the regime or obtain authorisation will not be able to enter new DPC agreements after Regulation Day. Existing agreements entered before that date remain outside the regulatory perimeter and can continue to be serviced.

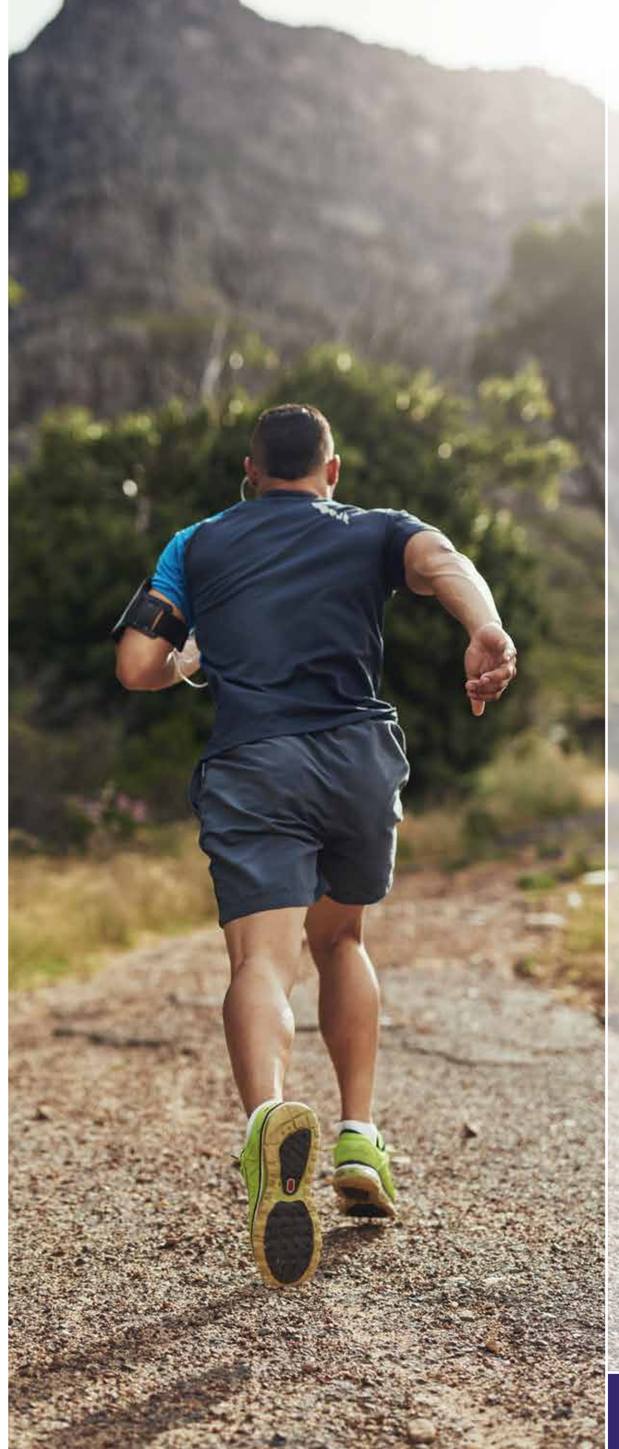
How Auxillias can help

PS26/1 provides the blueprint for how DPC products must operate going forward. Firms will need to review their products, customer journeys, affordability processes and governance frameworks over the coming months.

Auxillias supports lenders and consumer credit firms with regulatory implementation and governance design. We help clients interpret FCA policy, review documentation and customer journeys and build oversight frameworks that meet both the letter and spirit of the rules.

Auxillias is already working with firms in the BNPL and wider consumer credit market to help them prepare for the transition from an unregulated model into the FCA regulated regime. This includes supporting clients with regulatory interpretation, governance design, authorisation strategy and operational readiness ahead of Regulation Day.

If you would like to discuss how BNPL regulation may affect your business or how to prepare for the move from an unregulated to regulated model, **the Auxillias team** would be happy to help.





Debbie Brogan
Legal Director
Yuill+Kyle

To use or not to use...

A recent Scottish court case involved whether or not any deduction in sums to be returned to customers should be made for use of a car where the car is ultimately rejected by the customer.

The customer entered into an agreement with Santander in 2021, for the supply of a used car. Prior to the agreement, the car had been involved in a road accident in which the driver's side airbag had been deployed and so the car did not have a functioning driver's side airbag when it was delivered to the customer. They had concerns about the safety of the car shortly after taking delivery, though it could be driven and was roadworthy.



The customer rejected the car over a year after taking delivery. Santander accepted the customer's rejection. It had been driven for approximately 9,572 miles between before it was rejected.

Following rejection, Santander refunded all payments the customer made, though deducted sums to represent the customer's use of the car. The customer wasn't happy about the deduction and raised court action against Santander.

An evidential hearing took place. The customer's position was that there should be no deduction of the sum paid in relation to use of the car. Santander's position was that the deduction was adequate and fair in the circumstances and should not be reduced.

With reference to the statutory provisions and case law, the Court confirmed:

1. whether or not to allow a discount for use of a vehicle is a matter for the discretion of the Court

2. the Court should exercise its discretion in light of the whole circumstances of the case

3. in calculating any deduction for use, reference should be had to the daily rate payable for the car per the terms of the contract

4. any deduction should reflect the benefit the consumer has had from the use of the vehicle

The Court considered the customer's use of the car and the mileage incurred, however was not persuaded that the general condition of the car had affected the customer's use of it.

The Court decided that a reasonable amount to allow for the customer's use of the car was £3,896.40 and ordered payment of that sum by Santander.

Finally, the Court considered that the £500 Santander had paid to the customer in relation to inconvenience, was adequate.

This decision provides authority in Scotland that a deduction for use of a car which is rejected may be applied to sums refunded, though the amount of deduction will be calculated based on an analysis of the full circumstances of the case.





CCTA CEO named **MALG Ambassador**

Jason Wassell, Chief Executive of the CCTA has been named a Money Advice Liaison Group (MALG) Ambassador, recognising his long-standing contribution to dialogue between lenders, advisers and policymakers across the consumer credit sector.

MALG plays an important role in bringing together professionals from across the financial services and debt advice communities to discuss the practical realities facing consumers and firms.

Jason has been closely involved with MALG for many years, regularly contributing the perspective of smaller and specialist lenders and supporting discussions on issues ranging from regulatory change to consumer outcomes. He also serves as part of the Group's Board.

His appointment as an Ambassador reflects both that ongoing engagement and the importance of maintaining open dialogue across the sector.

For the CCTA, participation in forums such as MALG remains an important part of ensuring that policy discussions are informed by real-world operational experience, helping to support solutions that balance strong consumer protection with continued access to responsible, regulated credit.



Lucy Donovan named as part of Credit Connect Awards Judging panel

Lucy Donovan, Head of Strategy & Communications, will be judging the upcoming Credit & Collections Industry Awards, hosted by Credit Connect.

The awards celebrate innovation, best practice and positive outcomes across the credit and collections sector, recognising organisations and individuals who are making a meaningful contribution to the industry. Categories span areas such as customer experience, vulnerability support, technology, and responsible lending.

Lucy's involvement as a judge reflects the CCTA's continued engagement with wider industry initiatives and its commitment to promoting high standards across the consumer credit market. The judging process brings together a panel of experienced professionals from across financial services to assess entries and identify examples of good practice and innovation.

The awards ceremony will take place later this year, bringing together organisations from across the credit and collections community to celebrate success across the sector.



CCTA welcomes new members

The CCTA is pleased to welcome several new organisations to the association: Profexx Partners Ltd, Fintern Holdings Ltd and The Compliance Guys.

The addition of new members reflects the continued importance of collaboration across the consumer credit sector. The CCTA brings together lenders, advisers and service providers who share a commitment to responsible, regulated credit and positive consumer outcomes.

Being part of CCTA provides firms with a collective voice in discussions with regulators, policymakers and other stakeholders. It also offers opportunities to engage with peers across the industry, share practical experience, and contribute to policy debates that shape the future of consumer credit.

Through its policy work, events, and member communications, the CCTA aims to ensure that the perspective of smaller and specialist firms is represented and understood.

We look forward to working closely with our new members and supporting their participation in the CCTA community.

ccta CONFERENCE

AI • DATA SECURITY • EMERGING TECHNOLOGY

event sponsor

LANTERN GROUP

Catalyst will focus on the growing use of artificial intelligence in financial services, alongside key issues such as data security and emerging technologies. These topics will be of critical importance to firms operating across the financial services sector, particularly as technological innovation continues to accelerate and reshape business models and regulatory expectations.

Attendees will hear from a range of expert speakers and panellists, with ample opportunity for discussion and networking. The event will bring together delegates from across the industry, representing a broad mix of sectors. Firms from across financial services, including lenders, brokers and associates, will be in attendance.



Addleshaw Goddard, 41 Lothbury, London, EC2R 7HG

Members: £175 + VAT • Non-Members: £275 +VAT

Tuesday 28 April 2026

10.30am - 3.00pm

SECURE YOUR PLACES
CLICK HERE TO BOOK

Catherine Routh
General Manager
Credit Information Governance Body

Andrew Thompsen
Group Manager
Information Commissioner's Office

John Reynolds
Audit, Risk and Compliance Director
Lantern Group



Acquired.com wins 'Best Customer Experience' at Open Banking Expo Awards

Acquired.com has won the Best Customer Experience award at the Open Banking Expo Awards for their Hosted Checkout solution.

The judges specifically praised the platform's *"depth and simplicity,"* noting their ability to integrate Pay by Bank at the flick of a switch is *"powerful"* for businesses managing limited technical resources. This award reflects their commitment to removing the barriers to Open Banking adoption, allowing CCTA members to deploy secure, cost-saving payment methods via a simple no-code toggle.

"Winning this award is a testament to building solutions with the customer at their core," says Eline Blomme, Chief Product & Marketing Officer. *"We built Hosted Checkout to help merchants balance the demand for innovative payment methods without the need for extensive development resources."*

For lenders, this means a faster route to offering seamless payment options like Apple Pay and Open Banking, improving checkout performance while meeting the high standards for customer outcomes required in today's regulatory environment.

Learn about the award-winning solution here.



Creditstar receives FCA approval for consumer lending expansion

Creditstar Group's UK subsidiary has received Financial Conduct Authority approval to operate as a mainstream consumer credit lender, enabling it to offer personal loans of up to £10,000 with repayment terms of up to 60 months.

The Tallinn-headquartered European fintech operates across eight markets and says it has processed 1.4 million credit applications over 15 years. The expanded permissions support the Group's plans to scale its UK lending activities and broaden its product offering.

Creditstar's platform applies automated analytics to data from open banking, credit bureaus and other sources to inform affordability and creditworthiness assessments.

The move marks a shift beyond the company's limited high-cost short-term credit activity in the UK. Creditstar is not originating any new HCSTC agreements and will run off the existing portfolio.

"This authorisation allows us to fully deploy our technology-enabled lending platform in the UK," said Aaro Sosaar, Founder and Chief Executive. *"We're committed to building a scalable and responsible lending business here."*

To support the expansion Creditstar has opened a new London office at 210 Euston Road. The Group has been profitable every year since its founding in 2006 and employs more than 150 people, with offices in Estonia, Poland and the UK.



Evlo partners with *CreditLadder* to help renters build credit history & advance financial freedom

Evlo has announced a new partnership with CreditLadder, the UK's first and biggest rent-reporting platform, to help more renters build a stronger credit history by having their rent payments reflected on their credit file.

The partnership is the next milestone in Evlo's industry-leading Financial Freedom for Everyone campaign, which calls for reform to make the credit system fairer and more inclusive for renters.

Through this collaboration, Evlo will be able to connect its renter customers, especially those with a *"thin file"* or limited credit history, to a practical tool that helps them build a more visible financial profile over time.

Asif Nadeem, Chief Transformation Officer, states: *"At Evlo, our mission is financial inclusion, helping people move back towards mainstream finance. Rent is one of the biggest monthly payments many people make, yet it hasn't consistently helped renters build their credit history. Partnering with CreditLadder is a practical step we can take right now to help change that, while we continue to lead the industry push for broader reform through Financial Freedom for Everyone."*



Lantern Group announces acquisition of Ascent and opening of Leeds office

Lantern Group is entering a new phase of growth following the announcement that its parent company, Copper Street One Group, has agreed to acquire Ascent Performance Group, one of the UK's largest specialist debt recovery law firms (subject to regulatory approval). The acquisition expands the portfolio of financial services businesses and brings Ascent into the Group as a sister company alongside Lantern and Sonex.

Ascent - recognised for its ethical approach, regulatory excellence and specialist capabilities across litigation, collections, recoveries and field services - will retain its brand, people and Manchester headquarters. The move strengthens the Group's expertise across the credit lifecycle and creates opportunities to enhance client solutions while maintaining continuity for partners.

Supporting this momentum, Lantern has opened its head office at Apsley House in Leeds. The workspace is designed to drive collaboration, innovation and wellbeing, and supports the Group's growing team and services. Together, the acquisition and new office mark a significant next chapter, reinforcing Lantern Group's commitment to growth and delivering better financial outcomes.

Paul Mason, CEO of Lantern Group, said the move is *"a powerful statement about who we are and where we're heading,"* highlighting the platform to support more clients and customers.



James O'Donnell
Director of Research & Consulting
Transunion

The rise of finfluencers

Democratised knowledge, amplified risk

The rise of financial influencers, or "finfluencers", is widening access to financial education but can also expose consumers to bad advice, fraud and financial harm.

Finfluencers can be a powerful force for good. They bring financial education to a mass audience with a reach that traditional programmes may not have achieved. Content on platforms such as TikTok, Instagram and YouTube have made financial guidance more accessible than ever, particularly for younger consumers.

Recent research commissioned by TransUnion suggests this influence is already widespread. Fourteen percent of UK adults, nearly 7.7 million people, say they have followed financial advice from a social media personality. Of those who did, one in four (25%) admit they didn't check whether the influencer had any formal financial qualifications before acting on the advice. The trend is even more pronounced among younger consumers. Nearly three in ten (29%) Gen Z consumers aged 18-24 say they follow financial advice from influencers, though a third (32%) of those say they didn't verify the influencer's credentials beforehand.

While influencer-led financial education can improve awareness, it can open the consumer to significant and financially damaging risks. Fifteen percent of young adults following financial influencer advice reported negative consequences, including direct financial losses, damage to credit score or falling victim to scams.

The growing volume of ill-advised 'money hacks' and the promotion of risky products such as CFDs and crypto, whether badly informed or deliberately misleading, can have serious consequences for consumers who may not know better. A recent example saw more than a thousand bank customers facing serious legal and criminal consequences after following social-media 'free money' tips that were ultimately encouraging cheque fraud.

For firms operating in the consumer credit market, this trend brings to light several challenges. Consumers acting on simplified or viral financial "tips" may approach credit decisions with unrealistic expectations or misunderstandings about how credit works. Misleading online advice can encourage behaviours that resemble first-party fraud or misuse of financial products, creating both compliance and operational risks for lenders.

Yet the popularity of financial content online highlights a clear demand for accessible financial education. The industry therefore has an opportunity to play a constructive role in engaging with trusted voices, improving public understanding, and helping consumers distinguish between sensible guidance and advice that is reckless, misleading or outright fraudulent.

Ultimately, the industry should not ignore the reach and engagement finfluencers have built. It should look to harness the benefits while putting proper controls around the risks. Helping consumers understand their own financial data is one practical place to start. Access to credit reports and greater transparency around credit information can help people see the bigger picture, understand how poor decisions can affect their financial future, and make more informed borrowing choices.

Further down the road: What comes next for motor finance?



Kris Costello
Regional Head of Sales, UK & Ireland
Aryza

Once built around showrooms and paperwork, the motor finance sector has evolved into a digital-first journey shaped by evolving customer expectations, regulatory scrutiny, and rapid technological change.

Compliance, technology, and customer experience are no longer separate conversations in today's landscape, and lenders, brokers, and dealers need to continually adapt their strategies to keep pace to deliver better outcomes.

Digital demand meets economic reality

Digitalisation has changed how consumers borrow, shop, and buy. An increasing number of them are researching, applying and securing finance online, meaning expectations have shifted towards instant decisioning, transparent pricing, and seamless onboarding. Motor finance is now competing to keep up with the consumer's "digital experience" in other areas, from banking to retail.

However, this digital acceleration is playing out against a backdrop of economic uncertainty. Inflation, rising interest rates, and fluctuating disposable incomes have placed affordability and responsible lending firmly under the spotlight. Lenders are expected not just to provide access to credit, but to do so with a clear understanding of each customer's financial position.

From commissions to accountability

Motor finance continues to be influenced by an increasingly active regulatory environment, with the FCA playing a central role. The focus has been on commission practices, especially discretionary commission arrangements (DCAs). Insufficient disclosure and high commission levels have raised concerns about fairness, transparency, and value.

Further changes are coming this year, with the proposed Motor Finance Consumer Redress Scheme taking effect.

Faster decisions and smarter journeys

Technology is key in the evolution of motor finance, especially in underwriting and engaging customers. Data-driven decision-making allows lenders to evaluate risk and affordability more precisely while providing the quick responses customers demand.

Customer expectations

Affordability has become one of the defining issues in motor finance. With ongoing cost-of-living pressures and interest rate volatility, lenders must ensure customers are not just eligible for credit, but genuinely able to sustain it over time.

But trust and reputation are equally important for affordability assessments and responsible lending. Transparent pricing, clear communication, and fair outcomes build confidence and help retain customers in an increasingly competitive landscape.

Preparing for what's next

In the long term, emerging technologies such as autonomous vehicles could entirely reshape ownership and financing models. The key for lenders will be to prepare early in advance for these disruptive technologies and stay agile, embracing innovation while ensuring that change is grounded in compliance and customer care.

The future of the sector relies on three pillars: technological innovation, regulatory integrity, and customer-focused thinking. Those who effectively combine these elements will create quicker, fairer, and more transparent financial journeys - building trust and fostering sustainable growth in an ever-changing economic and environmental landscape.

The key for lenders will be to **prepare early in advance** for these disruptive technologies and stay agile.





Staying in the loop

How AI could improve customer communication in consumer credit

Andrew Marsh
CEO
Marsh Finance

Artificial intelligence is increasingly being used across financial services to manage customer interactions and streamline internal processes. In consumer credit, where firms communicate with customers about borrowing, repayments, and financial difficulty, AI tools have the potential to improve both efficiency and clarity.

As AI adoption increases, firms must ensure these technologies are used responsibly within a regulatory environment shaped by the FCA's Consumer Duty and its emphasis on delivering good outcomes for customers.

Improving customer service responsiveness

Customer service teams in consumer credit firms often handle large volumes of routine enquiries. Customers may contact lenders to check payment dates, request settlement figures, or better understand their agreements.

AI-powered chat or messaging systems can quickly answer straightforward questions, giving customers faster access to basic information and reducing wait times. This can be particularly useful outside of normal business hours.

Importantly, automated systems should not replace human support. Customers must still be able to speak with an adviser when issues become more complex or sensitive, such as when they are experiencing financial difficulty.

Supporting better complaint handling

Complaint handling is another area where AI can provide support. Modern AI tools can analyse written complaints and identify common themes, recurring issues, or potential regulatory risks.

This type of analysis can help firms detect emerging problems earlier and address root causes rather than simply responding to individual complaints. In turn, this may help improve processes, customer communication, and product design.

While AI can support analysis and triage, decisions about complaint outcomes should always involve appropriate human oversight.

Enhancing affordability conversations

Affordability assessments remain central to responsible lending. AI tools can assist advisers by analysing customer data and highlighting potential indicators of financial stress.

For example, systems could flag unusual changes in payment behaviour or patterns that may suggest a customer is struggling. This insight can help advisers ask more relevant questions and offer appropriate support where needed.

AI may also help simplify complex financial information. Tools that translate technical agreement terms into clearer, plain language explanations could make it easier for customers to understand their commitments.

Balancing innovation with responsibility

While AI offers clear opportunities, it also raises important ethical and regulatory considerations. Firms must ensure that automated systems do not introduce bias, reduce transparency, or create barriers for vulnerable customers.

Customers should understand when they are interacting with automated tools and always have the option to speak with a person. Used thoughtfully, AI can help firms communicate more clearly, respond more quickly, and identify customer needs earlier.

Ultimately, technology should enhance human judgement, not replace it. In consumer credit, trust and clear communication remain at the heart of good customer relationships.

> While AI offers clear opportunities, it also raises important ethical and regulatory considerations.



Modernising the redress system

Why firms should be paying attention now

Dan Richards
Founder & CEO
Profexx Partners

The FCA and Financial Ombudsman Service's latest consultation on modernising the redress system is more than a technical policy exercise. It signals how complaint handling and redress expectations are likely to evolve across financial services - with a clear direction of travel towards earlier intervention, stronger discipline in evidencing, and more predictable end-to-end handling.

For firms in consumer credit and motor finance, the timing is especially important. Many are already preparing for significant redress and complaints activity in the second half of 2026. Even though this consultation is broader than motor finance, it describes the environment in which any large-scale remediation will need to operate.

Several proposals stand out

First, the Ombudsman is consulting on a more formal registration stage, with the intention that only sufficiently evidenced complaints progress to full investigation. This is designed to reduce poorly supported referrals and improve consistency, but it also sets an expectation that firms can triage quickly and respond with clarity when information is incomplete or authority is unclear.

Second, the Ombudsman's dismissal grounds are being updated and expanded. The practical impact is that weak, premature, or unsuitable complaints may be filtered more consistently - but only if firms can demonstrate disciplined decisioning and a robust audit trail.

Third, the FCA is consulting on removing "good industry practice" from the fair and reasonable test, reinforcing that the relevant standards are those applicable at the time of the act or omission. Operationally, that increases the importance of evidence packs, contemporaneous records, and clear rationale for how historic conduct is assessed.

Alongside the consultation, the FCA has also finalised guidance intended to help firms identify and report issues causing foreseeable harm at an earlier stage, and to resolve problems more proactively. Taken together, this is a package aimed at improving predictability and transparency - but it places a premium on operational capability.

The key takeaway is simple: firms will increasingly be judged not on whether they *"have a view"*, but whether they can run redress as a controlled business process.

What should firms do now?

- **Confirm governance**
  Ownership, decision forums, escalation routes, and documented assumptions.
- **Pressure-test triage and evidencing**
  What you need, where it comes from, and how gaps are handled.
- **Review communications**
  Clarity, vulnerability handling, and representative journeys.
- **Strengthen MI**
  Early-warning indicators, backlog visibility, and outcome quality measures.
- **Be realistic on capacity and tooling:**
  Redress events rarely behave like BAU.

Modernising the redress system is an early warning signal. The firms that respond best will be those that design for change and build disciplined operational readiness before volumes and scrutiny peak.

If you'd like to sense-check your readiness assumptions or discuss the operational implications of the FCA/FOS proposals, feel free to contact Profexx Partners at www.profexxpartners.co.uk.



ccta ACADEMY

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
- conflicts of interest
- whistleblowing
- consumer duty
- cyber security
- regulated complaint handling
- vulnerable customers
- anti-bribery
- anti-money laundering
- data protection act
- financial promotions
- SM&CR - staff conduct rules

SECTOR

- retail finance
- pawnbroking
- motor finance
- guarantor loans
- high-cost short-term
- home-collected credit
- personal loans

MANAGER

- UK GDPR
- SM&CR
- consumer duty
- responsible lending



Credit trends

What changes do UK lenders needs to watch?



Neil Allen
Head of Credit Risk Strategy
LexisNexis Risk Solutions

The UK credit landscape is entering a period of significant change. As we move through 2026, economic pressure, regulatory reform and shifting consumer behaviour are reshaping how lenders assess risk, opportunity and affordability. The message is clear: deeper visibility and smarter use of data are no longer optional.



Rising demand reflects financial pressure

One of the most notable developments is the continued rise in credit demand. Credit enquiries are steadily increasing, driven not by consumer confidence but by necessity. With the cost of living remaining high and interest rates elevated, more people are turning to credit products to manage everyday expenses. January 2025 alone saw the highest jump in credit card borrowing since late 2023, and this trend is expected to continue into 2026.

For lenders, this creates a more complex risk environment, with a growing number of applicants whose financial resilience may not be immediately clear through traditional assessments alone.

BNPL enters a new regulatory era

Buy now, pay later (BNPL) is undergoing a fundamental shift. From July 2026, BNPL providers will fall under full Financial Conduct Authority regulation, requiring authorisation, proportionate creditworthiness assessments and stronger governance across all agreements.

As BNPL moves into more heavily regulated territory, the bar for visibility and decisioning will rise. Lenders will need risk models that are backed by robust data sources to support compliance, protect consumers and minimise defaults.

Financial inclusion: Aspiration to expectation

Financial inclusion is also taking centre stage in 2026. Millions of UK adults remain financially underserved or excluded, despite often demonstrating stable financial behaviour. Traditional credit scoring methods can struggle to reflect this, particularly for those with thin or non existent credit files.

The growing use of alternative data is helping lenders better assess overlooked borrowers, enabling fairer affordability decisions while strengthening portfolio performance.

Rental data gains momentum in assessment

Rental data is becoming an increasingly visible component of consumer credit assessment. Rent payments can provide valuable insight into financial reliability, yet have historically sat outside traditional credit reporting.

By incorporating rental data, lenders can fill key visibility gaps and gain a more complete understanding of applicants whose strongest indicators of financial responsibility exist outside mainstream credit products.

Motor finance redress intensifies operational and data challenges

UK motor finance lenders are preparing for regulatory-led remediation to millions of consumers over unfair car loan practices occurring over the last twenty years. This will create unprecedented operational, outreach and fraud-related challenges. As remediation planning accelerates, affected firms need to prepare data, governance and resourcing measures, and carefully consider what can be handled in-house and where third-party support is needed. Looking further ahead, firms will also need to consider how they can grow business, for example how improving data capabilities can help untap new lending opportunities and support better risk decisioning.

Looking ahead

Taken together, these trends point to a clear conclusion. In 2026, lenders that succeed will be those that adopt flexible, multi layered data strategies. Combining traditional credit information with richer datasets enables better decisions, stronger compliance and more responsible growth in a rapidly evolving credit environment.

This article is taken from LexisNexis® Risk Solutions' **Top Five Credit Risk Assessment Trends** report. **Download the full report here.**

LexisNexis® RISK SOLUTIONS

From AI innovation to consumer outcomes

The FCA's next regulatory focus



Matthew Drage
Director - Technology Solutions
Square 4

The FCA has launched two significant initiatives that signal its evolving approach to financial services: the Mills Review on artificial intelligence (AI) and an exploratory review into how firms monitor consumer outcomes under the Consumer Duty.

Together, they highlight an increasing supervisory focus on how technology, governance and customer outcomes intersect.

AI and the future of financial services

Led by FCA Executive Director Sheldon Mills, the Mills Review explores how advanced AI could reshape retail financial services through 2030 and beyond. AI is already widely used in areas such as fraud detection, credit decisioning, pricing optimisation and customer support. The FCA is now focusing on how more advanced and interconnected systems could affect market structure, competition and consumer trust.

The regulator has indicated it does not expect to introduce a new AI specific regulatory regime. Instead, it is assessing whether existing frameworks such as the Consumer Duty, SM&CR and operational resilience requirements remain fit for purpose in an increasingly AI enabled environment. This reflects the FCA's outcomes based approach, supporting innovation while ensuring markets function well and consumers receive good outcomes.



A parallel focus on outcomes monitoring

The FCA has also launched a targeted review into how firms monitor and remediate consumer outcomes in practice. The objective is to understand how firms assess outcomes, identify emerging risks and take action where standards fall short. Insights will inform future supervisory and policy work, with findings expected in a Good Practice and Areas for Improvement report in Q2 2026.

The review focuses on three areas: the strategies and frameworks firms use to monitor outcomes, the role of data and management information including the use of AI, and governance, oversight and board accountability. The process will include desk based reviews of 2025 Consumer Duty Board Reports, followed by targeted information requests and, in some cases, further engagement.

Strengthening assurance in an AI enabled environment

Both initiatives reinforce the importance of strong governance. Under SM&CR, responsibility for outcomes cannot be delegated to algorithms, and senior managers must demonstrate effective oversight and challenge of AI driven processes.

As automation expands, traditional monitoring approaches may struggle to keep pace. Firms are increasingly turning to data driven, technology enabled methods to assess outcomes at scale and generate clear, auditable evidence.

This is driving interest in structured outcomes testing and managed assurance services. Solutions such as Assure 4, developed by Square 4 Partners, combine regulatory expertise with AI enabled analytics in a human in the loop model, helping firms continuously monitor customer journeys and evidence how outcomes are being assessed and improved.

As regulatory scrutiny of AI and outcomes monitoring continues to evolve, firms that invest early in scalable assurance frameworks will also be better positioned to demonstrate compliance, strengthen governance and build long term customer trust. At Square 4, we are also seeing increasing demand for frameworks that connect technology governance, AI oversight and Consumer Duty monitoring.

Read our Assure 4 **brochure** and Outcomes Monitoring **whitepaper** to find practical insights into assessing customer outcomes, identifying risks early, and strengthening the link between monitoring and decision-making.



Motor finance DCA redress

What 'ready' really looks like

Helen Quinn
Head of Compliance
Product Partnerships

The debate around discretionary commission arrangements (DCAs) in motor finance has developed rapidly over the past year, with regulatory scrutiny, legal developments and the FCA's ongoing work on a potential redress scheme bringing increased focus to the sector.

Final decisions on any compensation scheme have not yet been made. However, the regulator has begun outlining how a redress scheme could operate if it goes ahead.

For many firms, the question now is simple: what does it mean to be "ready"?

The first step is understanding your data

Many motor finance agreements go back several years. In some cases, records may sit across different systems or even different businesses following mergers or changes in ownership. Firms will need to identify which agreements involved discretionary commission and whether they have enough information to assess customer impact.

If a redress scheme is introduced, the ability to quickly access reliable data will be critical.

Consider complaints handling

The FCA has currently paused certain complaint-handling requirements relating to motor finance agreements involving discretionary commission arrangements while it considers the wider redress framework. During this period, firms should ensure complaints teams understand the current arrangements and know how these cases should be managed consistently.

This will help reduce operational pressure if complaint volumes increase once the FCA confirms its approach.

Governance is also important

A redress exercise of this size requires clear internal ownership. Senior management teams should understand the potential operational demands and make sure responsibilities are clearly defined across the business. Boards will also want to understand the possible financial and customer impact, particularly as this sits alongside wider Consumer Duty obligations.

Think about customer communications

If a redress scheme goes ahead, millions of consumers could receive compensation. That means firms will need to contact customers about agreements that may be years old. Planning how those communications might work in practice can help avoid confusion and operational pressure later.

None of this means firms should assume the outcome of the FCA's work or accept liability. Instead, preparation is about ensuring businesses are operationally ready to respond if a redress scheme is confirmed.

For firms operating in the sector, being "ready" is all about understanding historic exposure, strengthening oversight and ensuring the business could respond if a large-scale redress scheme is introduced.

Preparation now is far easier than trying to build processes under pressure later.

CREDIT WEEK

HEADLINE PARTNER

EQUIFAX

23-25 June 2026
Celtic Manor, Wales

POWERING THE FUTURE OF FINANCE

Credit Week is the **UK's leading event for credit and financial services professionals**, bringing together senior leaders, fresh thinking and valuable connections across one unmissable week.

For creditors and lenders, it is a chance to build relationships, hear from the people driving change and be part of the conversations shaping the market.



Alison Walters
Director of Consumer Finance
FCA



James Dipple-Johnstone
Interim Chief Ombudsman
Financial Ombudsman Service



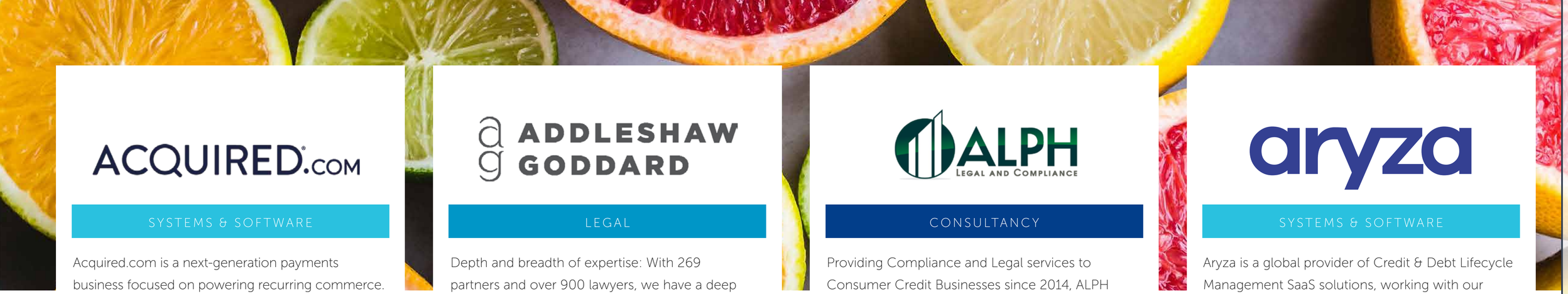
Vince Cable
Former Leader of the Liberal Democrats

CCTA creditor and lender members get 10% off

Use code **CCTA10**

Hosted by

CREDIT STRATEGY



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

aryza

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

AutoTrader

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

Auxillias

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

COEO

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

CREDIT-CONNECT

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

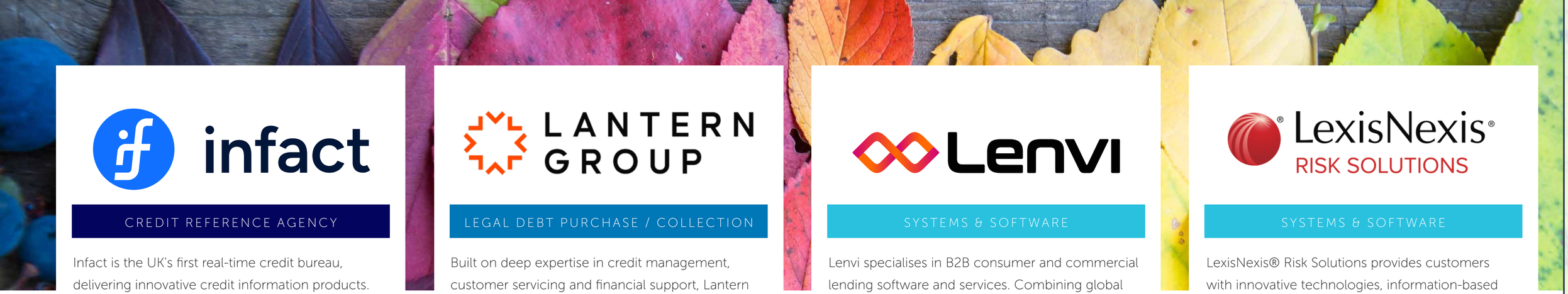
LEGAL

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



infact

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

LANTERN GROUP

LEGAL DEBT PURCHASE / COLLECTION

Built on deep expertise in credit management, customer servicing and financial support, Lantern Group has evolved beyond its origins. While Lantern's foundation is rooted in helping people navigate financial hardship with compassion and care, today they work across a broader range of servicing and business process solutions - partnering with clients to deliver outcomes that are both commercially strong and customer-centric.

Through the recent addition of the Ascent Performance Group business, Lantern Group has broadened its capabilities across consumer credit, banking, financial services, and other regulated sectors, with end-to-end services across the credit lifecycle covering collections, recoveries, litigation, enforcement, field services and loan servicing

Lantern Group stands as a true customer-champion within the debt-purchasing and servicing industry-recognised through multiple industry awards, accredited with Investors in Customers Gold and Investors in People, and renowned for placing the customer firmly at the heart of every decision.

lanternuk.com

Lenvi

SYSTEMS & SOFTWARE

Lenvi specialises in B2B consumer and commercial lending software and services. Combining global expertise, market insight, and end-to-end services to provide loan management software, risk management software for receivables finance, mortgage and loan servicing, and standby servicing.

Lenvi offers insight-powered technology and services to enable businesses to deliver more powerful, relevant, and responsible lending solutions. Combining 30+ years of unrivalled experience with a modern, agile fintech ethos.

lenvi.com

LexisNexis® RISK SOLUTIONS

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

Lightfoots SOLICITORS

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

mfdp

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

perch Group

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

Product Partnerships

Compliance Management Solutions

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

PROFEXX PARTNERS
Remediation. Reimagined.

CONSULTANCY

Profexx Partners is a specialist remediation consultancy helping regulated firms design, mobilise and deliver high-volume complaints and redress activity with speed, control and defensible customer outcomes. Remediation. Reimagined.

We challenge traditional consulting models with a leaner approach: tech-enabled, expert-led and built for scale-supported by a trusted network of delivery and legal partners, without big-firm overheads.

We translate regulatory expectations into practical delivery: operating models, workflows, customer communications, MI/QA and auditable controls that stand up to scrutiny. Our services include redress readiness and mobilisation, complaints operating model optimisation, flexible surge resourcing, authority and representative management, and workflow/tooling configuration to reduce cost-per-case and cycle times.

profexxpartners.co.uk

QUALCO

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

qualco.eu

REDPORTH

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

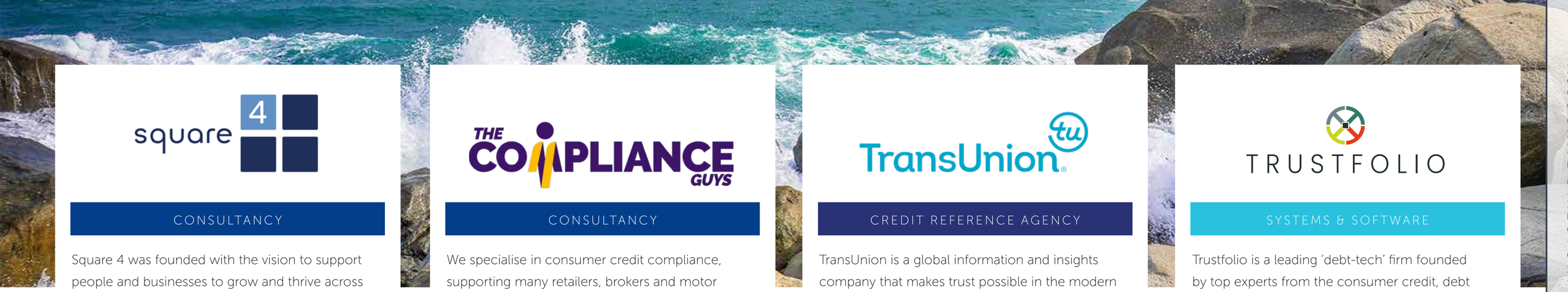
Snorkl

DEBT PURCHASE / COLLECTION

Snorkl is an AI agent built for debt support, helping customers in financial difficulty get the right help quickly, while supercharging debt resolution teams.

Live across unsecured lending, motor finance, and debt advice, Snorkl is shaped by our team's hands-on experience in lending and debt advice. Snorkl agents guide customers through complete debt resolution journeys via chat and self-serve, and act as a co-pilot for human agents, ensuring consistent, high-quality support every time.

snorkl.co.uk



square 4

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

THE COMPLIANCE GUYS

CONSULTANCY

We specialise in consumer credit compliance, supporting many retailers, brokers and motor dealers across the UK. We guide businesses through the process of obtaining FCA authorisation, delivering a high volume of successful permissions each year.

We are also an FCA Principal regulatory host with a growing portfolio of Appointed Representatives. We provide the structure, oversight, and regulatory framework businesses need to operate compliantly under our permissions.

Our support doesn't stop once authorised. We offer ongoing compliance guidance, documentation management and audit to ensure businesses remain aligned with FCA requirements as it grows.

We cut through regulatory jargon and provide clear, practical advice, because compliance should feel manageable, not overwhelming. With us, firms gain a partner committed to protecting and strengthening business, not one putting barriers in the way of growth.

thecomplianceguys.co.uk

TransUnion

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

TRUSTFOLIO

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

WALKER MORRIS

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

YUILL + KYLE

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





MAR 2026

ccta MAGAZINE

info@ccta.co.uk

ccta.co.uk

linkedin