

BCCA REVIEW

Representing UK alternative lenders

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Featuring

BCCA Plans For 2016 • Data Protection Reforms • Vulnerable Customers

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WELCOME TO

REVIEW

A message from the CEO

As this is the first edition of 2016 I will wish you all a late Happy New Year. We come into 2016 with a great deal of optimism, or maybe more a belief that we know we can take on any challenge that this year throws at us.

The last few months of 2015 were busy right across the BCCA membership and that meant we had our hands full. There were certainly some challenges but also some suggestions of a way forward, some glimmers of light.

For those of you that have been going through the FCA authorisation process you may be picking up further indications that we are soon approaching decision time, something which dominates your horizon. Cheque cashers and other money service businesses, continue to fight to retain their banking facilities. We are pleased that this issue seems to be getting some traction with regulators and government.

Looking ahead we now have a number of campaigns underway that will flow into 2016. These include working on banking facilities; FCA authorisation; cheque imaging; the CMA Order on payday and FOS approach to historic cases. There are other issues on the list, some of which should remain behind closed doors for just now.

It is our hope that as your trade association we have been of some help in meeting these issues. We know that many of our members appreciate the support that we have offered. We are always available by phone or email to provide advice, and this is an important member benefit during a time of uncertainty.

What I would say is that we can only achieve our objectives with the support of our members. It is currently membership renewal time, and so I would like to thank those of you that have already paid your membership fees.

Looking back to the close of 2015 and we can't help but recall our Annual Conference in Nottingham. We were delighted by how the event went and there were some great speakers as well as interesting questions from the floor. Most importantly we have had a great reaction from those attending. Many thanks to all that took part.

An issue that came up across a number of the conference sessions was that of vulnerable customers. So we are delighted that Anthony Sharp has offered us an article for this edition of Review.

Whilst the focus of the discussion on vulnerability is around financial services, we know that this could easily become an issue in wider commerce. With the growth of social media every transaction is under the microscope, so a mistake can quickly become big news and bring reputational damage. So it's important for us all to think through these issues.

“We can only achieve our objectives with the support of our members.”

It was Anthony that also recently facilitated a training workshop on these issues. This brings us to another theme that we are picking up in this edition of Review – the importance of training and development. Please take some time at the start of 2016 to think about how you will keep up with the latest developments and how training can help create a competitive advantage. It's an area where we are certainly happy to help.

I close by saying that we have made a few changes to our team structure. I am delighted to announce that Lisa Holder will be moving to become Deputy Chief Executive, whilst Brian will become Head of Membership Services. This clarifies the roles they play, and is recognition of their contribution to the BCCA.

The best of luck to us all for 2016.

Jason Wassell

Chief Executive Officer

Contact Jason on 07734 695714 or email jason@bccaco.uk



Competing for Comparison

A personal view of price comparison websites

Graham Muir of Trusted Cash Ltd, and BCCA Board Member, examines the impact of the requirement on lenders to be listed on a Price Comparison Website.

"In August of this year, the Competition and Markets Authority, CMA, published details of requirements to be implemented within the High Cost Short Term market. This was followed by consultation from the Financial Conduct Authority, FCA, who sought lenders opinions on these requirements.

One of the key recommendations was a requirement for HCSTC Lenders to be listed on at least one comparison website and publicise details of the comparison website on their website.

This was not a surprise as the previous incarnation of the CMA, the Competition Commission, in 2007, ordered the doorstep lending industry to set up their own self-funded comparison site to give customers more transparency on costs of credit and to encourage competition for customers. This particular site has no advertising contained on its pages, and the CMA and FCA hold non-voting seats on the board.

"I do agree that we should always look to improve our customers experience in choosing a product."

For the purposes of measuring the success of this website, I sought out a web tool that would estimate daily visits and compared this result with one of the leading commercial sites in operation. The Leading commercial site has an estimated 7,058 visits per day, whilst the industry funded site has an estimated 93 daily visits. Clearly this solution, given the size of the doorstep lending market, has not produced the perceived customer need.

It is clear then that a non-commercial comparison site is simply not an effective method of meeting the CMA's requirements from their order. To this end, I can understand why the CMA's preferred option was to have a number of commercial sites offering this proposition.

Comparison sites for HCSTC are still in their infancy. Until recently, if you wished your company to be placed on this site, they would place you according to how much you were willing to pay per click through. Obviously this favours the bigger players within the industry with their larger advertising budgets.

In order for the CMA's solution to work, rules must be in place that all approved sites need to adhere to. This has been picked up by the FCA.

My view is that for the site to treat customers fairly, the total cost of credit should be the default measurement where companies are ranked from cheapest to highest in that order.

This is something the CMA has indicated as a preferred measurement of comparison. Within the information on each company, details such as administration or collection fees should be displayed alongside what trade bodies the lenders belong to.

Finally, there should be space to allow companies to promote their values and inform customers of any other benefits in using them as a loan provider.

Unless there is standardisation of these approved comparison sites, what will happen is that companies will choose to be highlighted on the site that favours them the best.





Just as in the utility industry, there is an obvious advantage for the bigger well-known brands when they are featured side by side with smaller entities. There has also been an increase in our industry to feature customer review sites results as part of the advertising strategy. There have been stories related to some of these sites recently in the media that call into question their validity and any use of them by means of ranking lenders would be, in my view, suspect.

“The CMA should be able to illustrate that customers have indeed benefitted from the order.”

I do agree that we should always look to improve our customers experience in choosing a product, there will be some benefits to customers in presenting the plethora of lenders to them in an easy to understand format.

Care must be given in the design of these sites to mirror those of the established comparison sites for utilities and insurance as an example. This will aid customers understanding of the information being presented to them. A potential problem however, is that they will be swamped with the amount of lenders presented and decide to simply choose a brand that they know of rather than finding out which brand offered the best deal.

In relation to the traditional “pingtree” model, lead generators will have to consider changes to their processes at the “customer facing” end.

I can see models developing whereby customers will be presented with a choice of lender from the lead generator that best suits their needs. What we might then start to see is lead generators having branches to their pingtree where only certain lenders are offered to customers based upon the information provided to the lead generator from the customer. This will prove challenging to the lead generators at the outset, however by

managing this change effectively, they will see continuation of the Pingtree model albeit in a revised form.

The CMA proudly states on their homepage that,

“We work to promote competition for the benefit of consumers, both within and outside the UK. Our aim is to make markets work well for consumers, businesses and the economy.”

In order to measure the success of the order, I would like to see some established key performance indicators identified. The CMA has passed over implementation of its Order to both individual lenders (who need to report quarterly reports on their progress) as well as the FCA. It is now the FCA that are consulting on the standards that we should expect from price comparison websites.

In a year on from the implementation of the order, the CMA should be able to illustrate that customers have indeed benefitted from the order and that no section of our industry, particularly the established brands, have benefitted from the order over the smaller lenders and new entrants to the market.

The New Year will hopefully bring FCA authorisation to the remaining lenders and this should allow for companies to begin implementing their plans of growth under the supervision of the FCA. This is chance now for our industry to grow their customer base providing a product that customers want. The CMA order will not prevent this from occurring, however they must be willing to retrospectively examine the results of their change and be willing to consider changes in the future.”



Graham Muir

Graham was with Lloyds Banking Group for 10 years within the Asset Finance division. With an extensive background in Collections, Graham started in the High Cost Credit industry in 2008, joining Trusted Cash Ltd in 2012. An expert

in coaching, Graham is passionate about providing good customer service and has created the first, innovative customer reward programme within the High Cost Credit industry. Grahams interests outside of finance are following Hibernian FC and current affairs.

Cheque Fraud - A variation on a theme

A view from the front line of commercial fraud investigations

Dave Wood, a Security Consultant with Legate Group discusses cheque fraud and provides some helpful prevention tips.

"The ability for all of us to be deceived presents itself in many guises in all aspects of life, some of which present acceptable risks, others can and do have a devastating effect on both individuals and businesses.

Our experience this year in a number of high value fraud and theft cases has demonstrated that the appetite to commit fraud is as prevalent as ever. Whilst cheque fraud has seen a general decrease in opportunity (£17.8m down 35% in 2014), it still remains an ever present and potentially devastating threat.

One of the many areas for cheque fraud to potentially flourish is from organised crime and the very real cycle of what I would describe as end to end fraud. High profile cases have highlighted that when a person or a business can create a whole new identity, then the potential to deceive and steal becomes obvious.

The latter relating to businesses is of particular interest to me as it reinforces my belief that they offer the ideal conduit for committing all sorts of fraud. It is common knowledge within the investigation industry that there are a number of companies that solely exist to commit fraud. Long standing trading companies, sometimes with excellent credit ratings and balance sheets, who have dedicated websites, internet and telephone facilities. On the face of it they appear to be bona fide, however they have either been corrupted by new or unscrupulous personnel, or purchased with the intention to commit fraud.

These types of companies and individuals have the ability to verify and validate or, for want of a better word, act as referees for would be cheque fraudsters before moving on, in a short space of time. Obviously they cannot pursue this on a stand-alone basis, however when it is supported by underlying identity documents it has the potential to be harmful.

Once a person's identity can be masked they then can operate effectively either in person or remotely, often using others to act on their behalf, albeit sometimes only for a short period of time before moving on. Consequently, the submission of counterfeit, forged or altered cheques becomes less risky, irrespective if the transaction is processed or not.

Some obvious front end prevention techniques are already widely adapted and regulated for, such as identity documentation; some additional diligence relating to companies you may want to consider are:

1. Clarify that the company drawing the cheque exists at Companies House. Are there any obvious issues e.g. late filings, dissolution, insolvency, recent change in directors or change of company name and address? Do they operate from real or virtual premises?
2. Check with the company's purchase ledger that the cheque is ok

to present. Sometimes a good indicator that internal fraud may be suspected by persons seeking to avoid corporate controls;

3. *Always record dates, names, telephone numbers etc. of those spoken to. Make notes of unusual events, such as website redirection.*

Due diligence and fraud prevention in relation to cheque fraud has improved dramatically over the last 10 years, improved further by Anti Money Laundering legislation, and it can, and does weed out a significant number of potential fraudsters, especially those that would not ordinarily commit such offences. System driven fraud prevention techniques have also contributed significantly to the reduction.

Intelligence sharing is vital if losses relating to cheque fraud are to be driven down further and it's no surprise that the Police and other law enforcement agencies are now actively promoting "dare to share" policies as their budgets come under continuous threat and resources are redeployed away from financial or commercial crime. Intelligence sharing between companies in the financial markets varies massively and it is of no surprise that when organised fraud does occur it has wide ranging consequences. Cheque fraud must not be treated in isolation, but as part of a wider problem and in the longer term, the solution. Whilst conduits for sharing intelligence already exist, it has been obvious in the cases which have recently come to our attention that they have been underutilised, or not used at all.

Continuous and meaningful training in relation to fraud remains one of the most effective prevention tools alongside the technical systems deployed. Certainly members of staff who have customer facing roles are at the forefront of intelligence gathering and often suspect potential fraudsters through usual interaction or local knowledge."



Security Consultant, Legate Group Limited

Dave Joined Greater Manchester Police in 1992 before leaving in 2000 on a career break. He has had numerous high profile security and fraud Positions in the commercial sector, including Group Internal Theft Detection

Manager for Boots and Head of Security for the Tote before it was privatised in 2011. He is now a security consultant at Legate Group Limited, which has included a senior contracted position at the Post Office, where he was part of the lead team for the procurement of security services worth between £17.5 and £35m. His main achievements have been in asset/cash recoveries as a result of fraud, not least the recovery of £110k from a major gambling fraud via proceeds of crime. Dave can be contacted at dave.wood@legategroup.co.uk

Credit Training Experts offer a range of accredited training prepared and presented by a **specialist consumer credit barrister and an experienced compliance consultant**. All employees, including managers and senior managers working within regulated consumer credit firms will benefit from our courses which will help unravel the plethora of regulatory requirements placed upon firms and will assist participants to better understand the exact nature of the requirements and how to evidence compliance with those requirements.



THURSDAY 3RD MARCH 2016

Course Title: Being authorised by the FCA - the legislation, the rules, the principles and conduct for consumer credit firms

Venue: London (also Birmingham on 10th March)

Time: 10am - 4pm

Cost: £475.00 + VAT (£425.00 + VAT if booked before end of Feb 2016)

THURSDAY 17TH MARCH 2016

Course Title: Complaints handling in consumer credit firms

Venue: London (also Milton Keynes on 24th March)

Time: 10am - 1pm

Cost: £250.00 + VAT (£225 + VAT if booked before end of Feb 2016)

AND

Course Title: Identifying and managing financial crime in consumer credit firms

Venue: London (also Milton Keynes on 24th March)

Time: 2pm - 5pm

Cost: £250.00 + VAT (£225 + VAT if booked before end of Feb 2016)

If booked together: £475.00 + VAT (£425 + VAT if booked before end of Feb 2016)

THURSDAY 14TH APRIL 2016

Course Title: Evidencing reasonable assessments of creditworthiness and affordability in consumer credit firms

Venue: London (also Birmingham on 21st April)

Time: 10am - 1pm

Cost: £250.00 + VAT (£225 + if booked before end of Feb 2016)

AND

Course Title: Financial Promotions, CONC, the FCA and the ASA

Venue: London (also Birmingham on 21st April)

Time: 2pm - 5pm

Cost: £250.00 + VAT (£225 + VAT if booked before end of Feb 2016)

If booked together: £475.00 + VAT (£425 + VAT if booked before end of Feb 2016)

Data Protection Reform agreed

EU agrees to bring data protection in line – new changes on the way

Mike Bradford and Helen Lord of Regulatory Strategies Limited take a look at the impending introduction of the new EU Data Protection Regulation that will come into force within the next two years.

“After 3 years of lobbying and discussion, the new EU data protection Regulation was agreed in December.

The European Commission put forward its EU Data Protection Reform in January 2012 to make Europe “fit for the digital age”. On 15th December 2015 an agreement was found with the European Parliament and the Council, following final negotiations between the three institutions (so-called ‘trilogue’ meetings).

The full EU press release can be found at http://europa.eu/rapid/press-release_IP-15-6321_en.htm. This also contains headline changes to our current data protection regime.

Following political agreement reached in trilogue, the final texts will be formally adopted by the European Parliament and Council at the beginning of this year. The new rules will become applicable two years thereafter.

What this means for the credit industry is that within two years, the current Data Protection Act will be replaced by the new EU Regulation.

“An EU Regulation must be transposed into each member state’s legislation exactly as drafted with no room for interpretation or amendment at country-level.”

Unlike an EU Directive, an EU Regulation must be transposed into each member state’s legislation exactly as drafted with no room for interpretation or amendment at country-level.

The aim of the Regulation is to harmonise EU data protection law to support the single market agenda.

The current model, with 28 member states each having their own legislation based on the Data Protection Directive (95/46/EC) but with very different local interpretation, sanctions and enforcement provisions, was perceived to be a barrier to achieving a single market as organisations and consumers were faced with 28 country-specific versions of the Directive as transposed into national legislation – in the UK, through the Data Protection Act 1998.

Essentially the compliance bar for UK organisations has moved up closer to the German model and there will inevitably be compliance and business challenges to prepare for the new Regulation – subject of course to the UK remaining part of the EU. Even if the referendum vote were for the UK to leave the EU, it is not uncommon for those

European countries which are not members of the EU to adopt similar legislation to their EU counterparts, to facilitate cross-border trade.

Having reviewed the current text – over 200 pages – the key differences from the current Data Protection Act regime include:

1. Joint obligations and liabilities for data controllers and data processors;
2. Mandatory data protection officers for most businesses where personal data is key to their operations – but this can be outsourced to an expert DP advisor.
The requirements for the role are strict and set out in the Regulation and there must be no conflict of interest with the job-holder who must have access to senior management / Board. Our advice is to address this requirement now, which can be fulfilled either internally or by appointing an external consultant. Regulatory Strategies is already in discussion with a number of clients on the latter option;
3. Mandatory data breach reporting to the regulator and to the affected consumers;
4. Mandatory policies, procedures, plans – and testing of data breach plans;
5. The relevant regulator will be where the main business office is established;
6. The Regulation applies to non EU businesses targeting goods or services at EU consumers;
7. The bar for consent has gone up requiring the consumer to take positive action to demonstrate consent;
8. Consent must be obtained for profiling;
9. The requirement for notifying the regulator of processing activities is removed;
10. Processing a child’s data on-line requires parental consent if the child is below 16 (Member States can take down to 13);
11. Subject access response time is reduced to a max of one month and will be free of charge;
12. A ‘right to be forgotten’ has been introduced BUT is limited to where there is justification for the consumer;
13. A right to data portability has been introduced enabling the consumer to require a data controller to pass their personal data to another data controller;
14. Data protection by design and by default are now legal requirements, i.e. systems and products must be built from the bottom up around privacy, and the ‘default’ position must only be to collect sufficient data for the precise processing involved;
15. Privacy Impact Assessments must be carried out and evidenced where new technologies are being deployed and
16. Increased fines of up to 4% global turnover.

Our strong advice is that you should be auditing your current data protection compliance now – if you have a clean bill of health at this stage the migration to the new requirements should fit into ‘business as usual’ rather than detract from your everyday commercial activities. Without this advanced planning the much more onerous obligations – and significant penalties for non-compliance – will materially impact your business. Approach it in as you have FCA regulation.

In particular, we would suggest you address the following:

- *Incident management plans should be in place. Data breach reporting is not currently mandatory in the UK but the new Regulation will require businesses to notify both the regulator and affected customers. It will therefore be essential to move quickly and, without a plan in place, it is likely that wrong decisions will be made.*
- *The recent Talk Talk hacking incident highlights the amount of potential adverse publicity that a data breach can cause – it also shows that an organisation needs to be able to demonstrate that it has sufficient security in place to prevent breaches and, if they do occur, are able to protect their customers and address gaps. It is also essential to be able to effectively communicate with the press and media should an incident get into the public domain.*
- *Policies and procedures will no longer be a ‘nice to have’ – data controllers will have to have these in place so checking that data protection policies, privacy statements etc. are in place and are sufficiently robust is essential. Previous action by the Information Commissioner’s Officer has already shown that just having procedures and policies in place is insufficient – staff need to be fully trained and aware of their responsibilities.*
- *The Information Commissioner’s Office already recommends the use of Privacy Impact Assessments / Privacy by Design in the development of any new product or new use of data. Again, this will become a requirement and a documented process will need to be in place.*



Helen Lord BA (Hons) is an expert in consumer affairs, fraud and consumer credit-related issues and is responsible for all aspects of Regulatory Strategies’ consumer-related consultancy.

She is founder and Director of CreditReportAdvice working with lenders and consumers providing consultancy on credit-related problems, building a credit history and fraud prevention.

With 20 years’ experience in the credit industry she was most recently Director of Compliance and Consumer Affairs for the UK’s largest credit reference agency.

She has headed up a 130+ strong Consumer Help Service team handling credit report and related queries ensuring Data Protection and Consumer Credit Act compliance.

She set up the UK’s largest credit report monitoring and fraud prevention service and is an acknowledged expert and specialist in consumer fraud prevention having initiated the UK’s first victim of fraud service.

She has been responsible for developing highly respected education and financial literacy programmes and is a media trained spokesperson on consumer and fraud-related issues.

- *You should already have robust contracts in place with Data Processors to ensure that they are meeting your data protection obligations. The future will see Data Processors facing their own data protection obligations so it is likely that clauses in contracts will need to reflect this.*

The above highlights a few key areas that are likely to impact on businesses. Taking action now will help to ensure that businesses and staff are prepared for the changes. And – as with our preparations for the FCA regime – if we leave things until the last minute all focus will be upon meeting the regulation rather than developing our businesses.”

Mike Bradford
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Mike Bradford LL.B (Hons) FCIB is an acknowledged expert in UK and international regulatory and consumer affairs, compliance and data protection, combining a strategic and commercial approach with an in-depth appreciation of the associated legal and regulatory challenges and opportunities.

He is a member of the UK / EU panel of data protection experts for DataGuidance (www.dataguidance.com) and expert advisor on global privacy and regulatory affairs for the Business Information Industry Association (www.biiia.com).

Prior to founding Regulatory Strategies in May 2009, he was UK and EMEA Director of Regulatory and Consumer Affairs at Experian, a FTSE 100 plc where he was responsible for regulatory compliance and driving the optimal and compliant uses and applications of data and information assets in product and solutions design and development in respect of credit bureau, marketing and value added services.

Between 2007 and 2009 he was the first UK President of the Brussels-based Association of Consumer Credit Information Suppliers (ACCIS), leading 35 consumer credit bureaus in 25 European countries and 7 associate members from all other continents.

In August 2008 he was elected to the European Commission Expert Group charged with identifying challenges and solutions to creating a single European credit market for consumers and lenders, and has presented to the European Commission and Parliament on related issues.

He has provided evidence as an expert witness on privacy, data protection, data sharing, marketing and credit to UK Parliamentary Select Committees and the Competition Commission.

He is a regular contributor to industry publications and presents at UK and International conferences on data protection, marketing and credit, regulatory, consumer and industry issues, both from a compliance and commercial perspective.

Benefits of membership

We find that there is no single benefit, rather a number that attracts firms. Some appreciate the work that we do speaking on their behalf to regulators. Others value our advice or guidance, often delivered through our training programme. This all blends together in the way we are able to share the experiences of our members in a safe environment.

- **Advocacy** – We aim to influence decisions made by government, the Financial Conduct Authority (FCA), Competition and Markets Authority (CMA) and Her Majesty's Revenue & Customs (HMRC) amongst others. We listen to our members and speak on their behalf to relevant stakeholders.
- **Up to date information** - We pride ourselves in providing up to date information to our members. We send out a weekly email update **Insight**, which covers industry news stories, regulation changes, and updates on any topical issues.
We also issue regular **Extra** publications providing additional insight on specific topics, feedback on any stakeholder meetings and a compliance Q&A, covering frequently asked questions.
And we publish this quarterly magazine which includes relevant articles from industry specialists, regulators and BCCA staff.
- **Media and public relations** – We can also help our members by advising on reputational issues. Our Chief Executive, Jason Wassell is one of the UK's first Chartered PR practitioners, as well as Fellow of the Chartered Institute of Public Relations. We are therefore placed well to provide advice and support to members on media, political and stakeholder matters.
- **Sector specific regulatory advice and guidance** – We offer advice and support to our members via direct contact with BCCA staff and guidance/ insight briefings.
- **Sector specific training*** - We provide sector specific training for consumer credit firms and Money Service Businesses (MSB's).
- **Online training packages*** - In partnership with online learning specialists Unicorn Training, members can subscribe to award-winning online compliance titles through Unicorn's ComplianceServe learning and performance platform.
- **Conciliation service** - We can help to resolve disputes between members and their customers.
- **Cheque Alert System** – We hold a database of potentially fraudulent third party cheques which members can subscribe to.

This service could help your business identify and prevent fraud and ultimately reduce your losses from cheque fraud.

- **Croner Business Support Helpline** – Members are provided with free access to the legal helpline, where they can seek advice on issues such as employment or company law;
- **Annual Conference*** - A great opportunity to hear from our guest speakers and to network.

Additional support

- **Regulatory Business Plan*** - With FCA submission high on many agendas, one of our most popular services is the review of a firm's regulatory business plan. This is often an area where applicants feel out of their comfort zones. We can advise on how to restructure the plan and advise on additional information that the FCA would expect.
- **Risk management*** - As risk is such an important part of the regulatory process, we have also been working with firms on aspects of their risk management. That can range from sense-checking their risk register, through to more extensive involvement in advising on their risk management framework (policy documentation, independent assessment, risk register, draft procedures).
- **AML*** - We can provide additional guidance support in this area including policy and process reviews. This is an issue that is important to both MSBs and FCA regulated lenders.
- **Policy work*** – We have a range of policy templates that are available to purchase including Business Continuity, Data Protection, Whistleblowing etc. Regulators often want firms to go further than the submission of templates, but these are a great foundation and we can help with customisation.
- **Website Reviews*** - We can review your website for compliance and provide feedback on how to meet the required standards.

** These services are open to members and non-members (with the exception of the online training packages) and additional competitive charges apply. However, members will receive reduced rates for these services.*

For further information, contact the BCCA team at info@bccca.co.uk or call us on 01925 737100 and we will be happy to help.

BCCA conference review 2015

Richard Fuller, as Chairman of the BCCA, welcomed over a hundred participants to the Annual Conference held on Friday 27th November.

Throughout the day a number of speakers addressed issues facing BCCA members, as consumer credit and money service businesses. It was also an opportunity for those attending to discuss plans for the future.

Richard's opening address involved an entertaining, and informative, description of his year as a member.

Jason Wassell provided his first address as Chief Executive and talked about a number of areas of concern for the membership. He included mention of the banks' approach to working with Money Service Businesses; FCA authorisation; the development of cheque imaging; and future changes to the online market.

In particular he set out the BCCA concerns for the future of cheque cashing if banks continued to review bank accounts and refuse to open accounts for new entrants.



Jason talked about how the BCCA would further develop to be a modern trade association bringing together great advice, best in class training and effective advocacy.

Clare Hughes from Eversheds provided an overview of the changes in the legislation and regulation over the last year.

She also pointed to some issues that are coming down the road, including the transfer over of the Consumer Credit Act into FCA rules. Though much had been brought over during the development of the CONC Sourcebook, Clare highlighted that this would be a sizeable and complex task. As well as the possibility that changes would come about as the FCA interprets the legislation.

Then it was on to the consumer credit panel session, which turned out to be one of the most popular events of the day. We invited panel members to discuss topics submitted by BCCA members. And they covered a range of issues.

Panel members included Joanna Elson of Money Advice Trust, Karen Damanian of the Financial Conduct Authority, Karen Taylor of Themis Chambers and Denise Crossley of Motormile Finance Limited.

The first question for the panel members was to talk about the biggest challenge their organisations faced during 2015. For many of the panel members it was all about FCA authorisation.

The relationship with the FCA was also a hot topic for discussion, and prompted questions from the audience. However, the subjects were varied with a recurring theme being good customer care.

Gordon Madgwick from the Cheque and Credit Clearing Company came along to brief members on the progress of the cheque imaging project. He provided a comprehensive explanation of how the process would change, as well as setting out the timeline for completion.

There was interest in whether there was any way that the new threat of cheque fraud – submitting online and then taking a cheque into the store – could be mitigated by the system.

Our Conference 2015

Members were disappointed to hear that there was no way of flagging duplicate cheques in real time.

Members also heard from Karen Harms of the Advertising Standards Association about their approach to consumer credit advertising. As well as from Alastair Barter from the Information Commissioner's Office talking about the importance of data protection.



Conference was fascinated to hear from Cath Wohlers of the England Illegal Money Lending Team more about how loan sharks are able to gain entry into the lives of so many. They heard that loan sharks often go on to extort money, sometimes for decades.

One of the key sessions for those that are regulated by the Financial Conduct Authority was the address from Kate Damania and the opportunity to ask questions. During her session she provided an overview of what it would be like for lenders under FCA supervision.

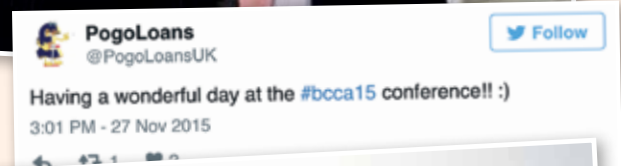
She clearly came to Conference with the message that attaining authorisation is just the start of the journey. This was a message that resonated with many members.

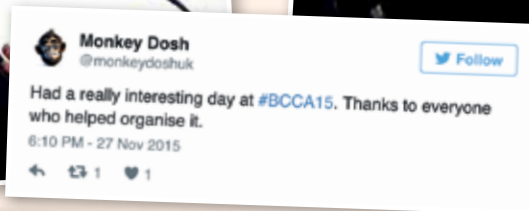
So the Conference came to an end.

Gathering feedback is always a difficult task but, those forms that did come back suggested the content had been well received. We deliberately kept away from content that was about selling services or products, and that seemed to be appreciated. The speakers were all about the issues that our industry faces.

Talking of sales and it is important that I also thank our exhibitors and sponsors. It is only with their support that we can run such a good conference. We welcome their involvement.

If you have any thoughts about how we can improve next year's conference then please do get in contact.





BCCA campaigning

2016 is already a busy year

We are not quite starting the New Year with a blank slate. There are number of campaigns that are already underway and that will keep us busy for the first few months of the year.

The banking sector - The banks approach to Money Services Businesses, particularly cheque cashers, continues to be an area of concern. It's been a long-term problem and so it is no surprise that we will see more of this in 2016.

Over the years we have seen the number of banks willing to work with cheque cashers decrease, with many seemingly unwilling to take on new customers in this sector.

The closing down of a bank account puts any business at risk, and with other banks not willing to open new accounts it can be a commercial death sentence. And it's not too hard to imagine that the banks might see small lending businesses in the same light.

We know that this is an area where we need to work with others, and we are delighted to work in partnership with the National Pawnbrokers Association on this issue.

This problem has been spotted by the banks regulators – the FCA – and they have commissioned research to bring some facts into this discussion. And members of the BCCA have volunteered to tell their story.

“This problem has been spotted by the banks regulators – the FCA.”

So that is one opportunity we are pursuing, and that may include this issue being discussed by parliamentarians during early 2016.

For many that are travelling down the path of FCA authorisation, they may have hoped that the New Year would have started as firms with authorisation. However, that was not to be but as we approach the twelve-month mark the end may soon be in sight.

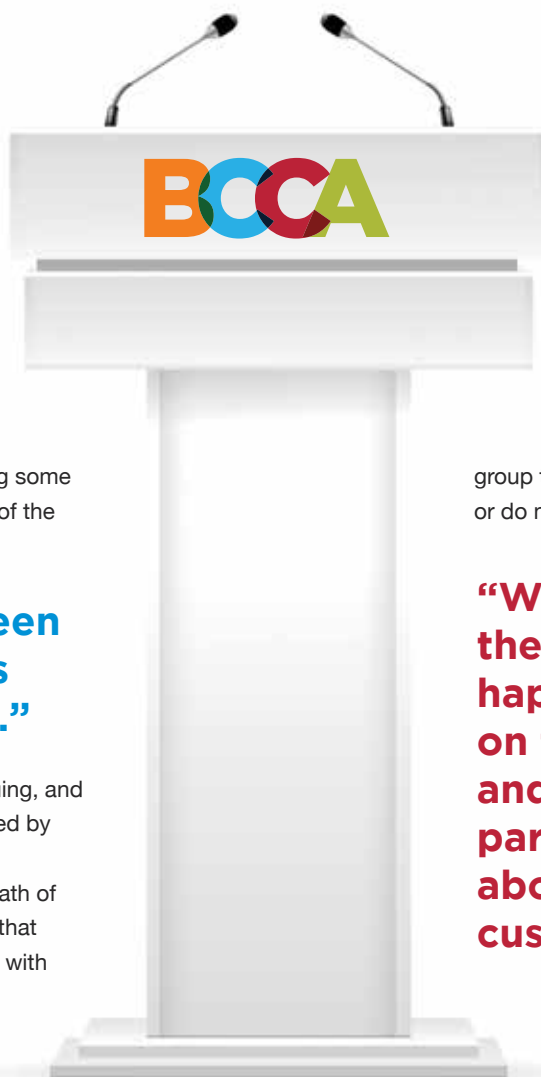
We have been working with members, and the FCA, to ensure that we keep the members informed as well as the regulators aware of any concerns. That work will continue on until all of our members have gone through the process.

Cheque imaging - Meanwhile those who have been following cheque cashing will know that all the legal steps have been taken to ensure that cheque imaging will start later this year, with all banks involved by autumn 2017.

Our concern is that cheque imaging will open up new possibilities for cheque fraud. There seems to be nothing that can be done to stop individuals scanning an image using their smart phone and then taking the physical cheque into a cheque casher. Already we have had a couple of members suggest that this may be the straw that breaks the camel's back.

We have been following the development of the project and liaising with the Cheque and Credit Clearing Company to represent our interests. Though faster cheque cashing will remove some cheque cashing customers, there will still be many that want access to immediate cash. There will be another customer group that are unable to use their bank account or do not have access to an account.

“We are concerned that the banks are relatively happy to let us take on this additional risk, and that they are not particularly worried about the impact on our customers.”



We are concerned that the banks are relatively happy to let us take on this additional risk, and that they are not particularly worried about the impact on our customers.

Lending - Back to lending, and one area of concern is the approach that the Financial Ombudsman Service is taking to some complaint cases. Feedback from members seems to focus in on two areas. First is that there seems to be the application of current best practice and rules to historic cases, rather than the regulation that was in place at that time. Second is the suggestion of some inconsistency of decisions across similar cases.

“One area of concern is the approach that the Financial Ombudsman Service is taking to some complaint cases.”

This is something that we will be taking up with the Financial Ombudsman Service, but we will need the help of members to bring forward evidence that supports our position.

Price Comparison Websites - We continue to represent our members' interests as the FCA considers the recommendations made by the Competition and Markets Authority on payday lending. At the close of January, we will submit our response to the consultation on Price Comparison Websites.

Responding to consultations continues to be an important channel for communication and over the last few months of 2015 we were involved in consultations around such issues as broadcasting rules and high street planning regulations.

Payday levy - As we approached Christmas there was no time to wind down, as we heard a throw-away remark from the Chancellor which seemed to suggest that the Illegal Money Lending Team would be financed from an industry levy. It wasn't clear whether that would be the wider consumer credit or high cost short term credit.

We worked in conjunction with the Consumer Finance Association to share our messages, and we both quickly raised our concerns with our contacts in Government. It's an ongoing issue and something that we will be following up with over the next few weeks.

European matters - Europe is going to be a topic of discussion in the political world, and for us the closing days of 2015 saw the publication of draft data protection regulations come out of Brussels.

Over the next few weeks and months we should know more about what this will mean, but there have already been discussions about whether the 'right to be forgotten' could be misused by those attempting to hide payment records or whether new rules may prevent the use of data for 'profiling'.

And Europe will also shape money services with the introduction of the fourth Anti Money Laundering Directive. It is now up to the UK Government to create national legislation, and this will have a further impact across the membership.

So there is no time to sit back. The BCCA starts the year with a number of meetings to set up and campaigns to take forward. If you want to know more about our advocacy work, or want to provide your views then please do not hesitate to contact us.

Our weekly Insight email provides you with an update on what we are working on, and look out for our more detailed briefings.



Handling Vulnerability Professionally

Insight from Anthony Sharpe FCICM on this topic

We have asked Anthony M G Sharpe FCIM, Consultant of Anthony Sharpe Associates to write this article following his excellent course on “dealing with vulnerable customers” that was held for BCCA members in December 2015.

Following on from the session Anthony has provided us with his view on how an organisation should deal with “vulnerable” individuals.

“The study and understanding of vulnerability is rightly high on the agenda of many companies and organisations within the personal credit & debt sector at the present time. There is nothing new about the word or its existence in the workplace, but what is new is the change in attitude over the last few years towards those individuals who are vulnerable. This has been both encouraged and mandated through Regulation.

We need to look at the problem as a whole and from many angles. Should we simply introduce practices purely because we are told to by regulators or should we be more proactive and introduce good practice into our organisation because we believe it is the right and proper thing to do for our customers?

- *How would you like to be treated if you were genuinely in a vulnerable situation?*
- *How would you like your parent or grandparent to be treated if they were genuinely vulnerable?*
- *How would you treat them yourselves?*

As I am sure many of you are aware the Financial Conduct Authority, FCA, published their excellent Occasional Paper No 8 on Consumer Vulnerability on 24th February 2015. This document – 119 pages in length- is accessible on the FCA website- <http://www.fca.org.uk/static/documents/occasional-papers/occasional-paper-8.pdf>

The Paper makes clear that its purpose is to start a debate, but I believe The FCA expects the industry to initiate this debate. I support this. Firstly, we need to look into the mirror ourselves to see what shape our own organisations are in and if necessary consider instigating some of the policy changes that are proposed through a variety of on-going staff channels.

“One in four people will experience a mental health problem in the course of any one year.”

There continues to be a number of responsible organisations undertaking research into this highly complex subject and in suggesting practical ways of handling people, who are genuinely experiencing painful and disabling episodes in their lives, often caused and exacerbated by the debt situations that they find themselves in. Sensible thought needs to be given to the subject, cases need to be considered on an individual basis and not just thrown into the melee of processes and untrained front line operators. Common sense needs to rule the decision making of what is best practice.



I believe the Paper has widened the view of what is vulnerability. Although it includes those individuals whose vulnerability affects their ability to manage money- you could argue the most relevant to your business- it also includes many other forms of vulnerability that maybe we have not immediately seen on the radar.

“Assisting the genuinely vulnerable is to a great extent common sense.”

The Office of National Statistics estimates that one in four people will experience a mental health problem in the course of any one year. Dementia affects 6% of people over 65, and 20% of those over 80. One in eight people in the UK act as carers- these are indeed frightening statistics and it does not only affect us in our homes and families; it is very relevant to our businesses as these same people often are your customers or could indeed be so. For example, are your company’s systems handling these third parties correctly? Are you knowledgeable about those people holding Powers of Attorney? Surely we must break away from any inflexible attitude and assist the vulnerable properly on a case-by-case basis. However, let us also remember that your company is not a hospital. We need to treat people properly and do what is right. At the same time, you must not forget what the main purpose of your organisation really is.

“We should learn how to listen and use this listening to pick up the triggers that should expand the conversation.”

Assisting the genuinely vulnerable is to a great extent common sense but we need also to be fully aware of the number of people out there who will willingly abuse vulnerability. They are enjoying this focus on vulnerability as they believe that by using this as an excuse they will get their debts to you ‘written off’ or at least placed on hold for as long as they can convince you they are still vulnerable. They equally know what The FCA require of you. The FCA have no more time for these people than you do, so although we need to treat them politely we do not have to waste our energies on ‘assisting’ their false claims. However, helping genuine individuals properly through their various difficulties will produce the ‘goodies’ in the end.



I do not believe in lists to identify those who are apparently vulnerable. We should learn how to listen and use this listening to pick up the triggers that should expand the conversation and discover more about the vulnerability that the customer may be suffering. At the same time, we need to think carefully of the language we use to those that are vulnerable. We need to engage with them, explore their vulnerability so that you become aware of how it may affect your business with them. This will take careful training. For instance, how good are your staff at engaging with someone who is suffering bereavement? Any of us can become vulnerable at any time. Such vulnerability can be either temporary or permanent, mild or severe. Perhaps the old saying “treat others as you would wish to be treated yourself” is never truer than when handling customers who are vulnerable.

Recording the vulnerability of your customer on file requires that you adhere properly to what the Data Protection Act requires- most likely the exercise of explicit consent.

Now has this article wetted your appetite to learn more and ensure you get it right? Keep your eyes open for the next BCCA Vulnerability Course and we will welcome you or your staff on what I believe will be an interesting and worthwhile day.”

Anthony Sharp can be reached at: - Anthony Sharp Associates, 13 Summers Way, Market Harborough, Leicestershire LE16 9QE. Telephone No 01858 464892, email: - asa.associates@virgin.net

Handle Emotive Issues with Care

How training can help in dealing with vulnerable customers

“Helping staff stay on top of their regulatory and ethical responsibilities around such emotive issues as vulnerable customers must remain a priority for the financial services industry. When employees lack the knowledge, empathy and ethics to deal with such issues effectively, the consequences go way beyond being purely financial.”

This is the view of Simon Mercer, ComplianceServe Product Manager at Financial Services training specialists Unicorn Training Group, speaking upon the release of a new eLearning course **‘Enhancing the Experience for Vulnerable Customers’** which has been developed to help firms deal with the challenges more effectively.

Last month at the BCCA Conference Jason Wassell, revealed relationships with vulnerable customers are part of “nearly every discussion” he has had with the Financial Conduct Authority (FCA).

This follows the FCA’s challenge to firms to review their approach to consumer vulnerability, with some customers being confronted by a “computer says no” response when they seek assistance and support from firms.

“It only takes one bad news story to destroy a firm’s reputation; one customer who has been treated unfairly, one ad that is viewed as exploitative, appearing on the news or held to task by the consumer advice media.”

“The regulator will make its own judgments on penalties and sanctions for companies found in breach of its standards, but realistically it can be public condemnation and PR impact that can prove more damaging long-term.”

“Having a training approach where such issues are included as part of a firm’s wider ethical business culture, and not treated in isolation as a ‘tick box’ exercise to appease the regulators, can go a long way to avoiding such reputational damage.”

The BCCA has teamed up with Unicorn to offer online compliance training to its members through Unicorn’s **ComplianceServe** training solution.

The new Vulnerable Customers course is available to **ComplianceServe** customers and provides a practical toolkit with a range of tips and strategies to help them deal with vulnerable customers.

The new course has been designed as a series of short, digestible ‘chunks’ of learning which are easier for employees to fit around their daily activities.

It begins with a short, high-impact video, designed to set the context for the learning and explain why the subject is relevant - in



a fun and engaging way. Two interactive eLearning modules follow which include all the key facts and knowledge, and the opportunity to apply them in a series of case studies and real-life simulations. Finally, there’s a formal assessment so that learners can demonstrate their understanding of the key learning objectives.

About Unicorn & ComplianceServe

Unicorn has been creating learning and compliance solutions for the UK’s ever-changing financial services sector for over 27 years and understands the importance of embedding a culture of ethical behaviour and compliance that is reflected instinctively in employees’ conduct.

That’s why we created ComplianceServe, a trusted and effective solution designed to align with the regulated environment in your industry. Its unique features enable you to manage your compliance training, CPD and T&C needs through one easy-to-use and secure portal.

ComplianceServe gives access to a comprehensive library of eLearning content powered by SkillsServe, Unicorn’s award-winning online learning management system, ranked the no 1 LMS in Financial Services. This ready-made suite of learning tools is developed in partnership with leading professional bodies and associations to ensure it covers current and emerging compliance training topics.

For more information about ComplianceServe visit www.unicorntraining.com/complianceserve above is a sample of the screens you will see as part of the session.



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Ten Tips for Handling Vulnerable Customers

Useful advice from Lisa Holder, Deputy Chief Executive of the BCCA



1 Make sure you have a vulnerable customers' policy.

This policy should explain how a vulnerable customer is treated and acknowledge that interactions with this type of customer may take longer than usual or be ended early depending on the circumstances.

2 Be flexible. It is important that customers are treated individually and flexibly. Rigidly sticking to rules can often make situations worse, result in complaints and poor customer outcomes.

3 Consider creating a dedicated team. This should help ensure that vulnerable customers get the correct support. Front-line staff should know who is in the dedicated team and when cases should be referred to them

4 Train your staff. It is essential that staff are trained on how to listen to customers and spot the warning signs of a customer being vulnerable. They should know how to handle this type of customer, tailor outcomes to the individual and when to refer on to specialist help. This training must also be kept up to date.

5 Provide support your staff. It may be distressing for staff to deal with vulnerable customers. Firms should provide support, so as to reduce any impact on them personally.

6 Signpost to specialist help. In some cases, customers may need additional specialised help. It is good practice to develop contacts in support organisations such as the Samaritans and debt advice firms, so that calls can be transferred directly over to the most appropriate person rather than passing on contact details.

7 Ensure compliance with the Data Protection Act 1998.

The capturing and holding of information in relation to an individual's health is classed as sensitive data under the Data Protection Act 1998. Staff must obtain explicit consent to record and use this type of data, and explain why and how it is being used.

8 Flag up accounts. It is recommended that vulnerable customer accounts are flagged, so that any future contact will be handled by the dedicated team. This will prevent the customer having to repeat the situation every time contact is made and ensure that they are handled correctly.

9 Ensure you can handle third party requests.

On occasion family members or carers may need to get involved in a vulnerable customers' finances. Their details should be recorded, providing you have explicit consent from both the individual representing the customer and the customer. Controls should also be in place to ensure this information remains accurate and up to date and you should have a validation process to reduce the risk of fraud, or deliberate misuse by any individual who is representing the customer.

10 Treat customers the way you would like to be treated.

Remember any one can become vulnerable at any point in time.



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The importance of Training

It's a New Year and a time to make resolutions, and one area we would recommend everyone taking a serious look at in 2016 is training and development.

Our membership ranges from very small family run businesses to some very large online and high street operations. So whether this is about your own personal development, or the training programme for your team, then it is important that you think about what you will be doing over the year.

There is plenty of academic evidence to show that training can tackle those weaknesses that we all have; can ensure consistent customer service and even build employee loyalty.

Anyone looking at the markets within which we operate will have seen the need to adapt to a range of changes in technology, customer behaviour, legal requirements and new competition.

For many BCCA members there is the additional dynamic in that our regulators, be they the Financial Conduct Authority or HMRC, believe that training is important.

They come at it from slightly different angles, but they expect that you can demonstrate that you have the right blend of knowledge, skills and behaviours. Sounds familiar? Yes, across the regulatory environment there is an increasing focus on the culture that businesses create, much of which flows from training.

FCA and consumer credit

Those firms that have been applying for FCA authorisation will have been working on putting forward the best case for individuals that are leading your firm. The application was almost a snapshot of the firm at one point in time.

We certainly saw a drop-off in training course participation once the applications were submitted. However, the regulator is also looking for an approach that focusses on assessing the competence and training needs of employees on a regular basis.

It is an ongoing task, and is certainly not a tick box exercise. Anyone who has listened to the FCA talk about supervision will have picked up that this is the type of area that they will want to ask questions about.

The FCA has always been clear that firms will be expected to monitor the marketplace, and be able to spot any changes to products or regulations. We are happy to play our part as your trade association, monitoring developments and sharing information.

However, in numerous discussions the FCA have said that they believe firms should have the knowledge, technical skills and behaviours to deliver good customer outcomes.

All of this comes from picking the right people, then ensuring that they have the resources to continue with their development.

HMRC and AML

Members that are regulated by HMRC, as a Money Service Business, may feel that they have an easier time of it. The 'fit and proper' test could be seen as much more of a review character of the individuals directing a business rather than the testing their professional competence.

However, HMRC is also very clear about the need for adequate internal controls and monitoring. In their advice to firms they talk about the need to identify the responsibilities of senior managers and provide them with regular information on money laundering. They also broaden it, asking those that they regulate to train all relevant employees on their AML responsibilities.

I think for MSBs there is a good case to be made for going further than the guidance.

We are currently campaigning on the withdrawal of banking services to MSBs, particularly cheque cashers, because they believe that they are too much of a risk of money laundering.

It is a difficult battle to fight, but one of our objectives is to ensure that the banks consider the situation on case-by-case basis rather than taking a blanket approach. That they give firms the opportunity to show that they meet or exceed the regulations.

If we are successful, then individual firms need to be able to present the best case possible. Ensuring that you have the skills and right behaviours is important in showing that you have good internal procedures. You need to be able to show that they are examples of good practice, and well above any benchmark the bank has in place.

Training has always been an important part of the BCCA

This is why training has always been an important part of the offer made by the BCCA to its members. We would recommend that you have a look at the courses that we are going to be running in 2016, see page 24 for details.

Our training tends to focus in on regulatory and compliance issues, where we know that we provide courses that mix theory with practical examples.

These courses are usually small workshops, often just a handful of participants so you can be sure that it is tailored for your particular circumstances. We already have plans in place for training in AML, data protection, the consumer credit sourcebook, regulatory reporting and complaints handling.

Many of these courses are CPD accredited, providing an additional third-party endorsement for courses that you attend.

We want to keep adapting our services, and so we have also developed an online training package with Unicorn. This was in response to a request for additional flexibility.

When we heard that the cost may be an issue we also undertook to review the pricing. Look out for an article on page 23 of the new price offer for online training as well as the launch of an online course on vulnerable customers as part of the package.

We believe in a mix of training courses, with the flexibility of online but also the interaction that comes from face-to-face training. For key areas of development, it is always helpful to be able to ask questions and bounce ideas off other delegates.

Make training a priority in 2016

It makes sense to think about how you will approach training in 2016, what is expected from our regulators but more importantly it will keep you competitive.

This doesn't need to be complicated, but what we have learned from interactions with the regulators is that you need to be able to show it. Some simple steps would include:

1. Identify your training needs

Ensure that you think about where you can find information that will help spot any weaknesses. If you are working with others then consider how an appraisal might identify areas, sometimes simply asking where people need training is the easiest way. Look for other indicators, for example any information from complaints that you receive.

2. Consider what resources you have available or that you can buy-in

Whilst training courses are often a great way of building knowledge there are now more options, from traditional workshop training to online courses that fit with your situation.

We would also advise you to think wider than training courses. There will be a range of resources that you will probably have

available. They can be as simple as work-shadowing, team discussions, the development of simple written guides, filled out sample templates or industry articles.

3. Record your training and adapt

You may be already undertaking development activity, but it is just important that you record it.

If the regulator comes to call, or the bank asks about your AML processes, then they may not get into the detail of every individual training record. However, they might want to see the records of key individuals, or take a test sample just to test that you are as good as your word.

If you have staff then having a training record will show them that you have taken the issue seriously, and that you are interested in their development.

Last, but not least, think about how you can carry this through 2016 and into 2017. Run your training programme over the next year and then be ready to adapt it with any lessons that you learn.

Fantastic New Price for Online Training Courses

Now only £60 +VAT per user

The BCCA is delighted to announce that we have agreed a new pricing model for online financial service courses that will open up training opportunities for every member of staff.

In 2015, BCCA partnered with online learning specialists, Unicorn Training, to offer training packages which include a subscription service to access financial service learning through Unicorn's ComplianceServe learning and performance platform.

ComplianceServe was developed to help firms manage their compliance training needs through one easy-to-use, secure portal, combining a library of high quality learning assets with advanced diagnostic and management tools.

We were attracted to Unicorn Training because they have been creating learning and development and compliance solutions for the UK's ever-changing financial services for over 25 years and they are an award winning market leader.

Following a further review of this service, we heard that the previous cost of this service may be an issue for some firms. So we are pleased to announce that we have managed to secure a revised rate for access to ComplianceServe.

Members will now be able to have access to over 15 carefully selected courses for a 12-month period for a fantastic rate of just £60 +VAT per user.

If you have more than 100 users, we may be able to negotiate on this price further, so please get in touch.

These courses have been chosen to fit our sector. The revised pricing means that this is a way in which you can be sure that every member of staff has basic understanding across a range of business-critical areas.

In our opinion firms should be looking to at least train their staff annually on Complaints Handling, Data Protection, Treating Customers Fairly and Anti-Money Laundering, so this is a great offer.

The BCCA's library of courses available on ComplianceServe consists of the following:

- Enhancing the experience for Vulnerable Customers;
- Information Security;
- Conflicts of Interest;
- Risk Management;
- Whistleblowing;
- Complying with Sanctions;
- Countering bribery and corruption;
- Customer Due Diligence;
- Fighting Fraud;
- Treating Customers Fairly;
- Approved Persons;
- Complaints Handling;
- Introduction to the FCA;
- How to comply with the Data Protection Act;
- Senior Management Arrangements, Systems & Controls;
- Financial crime: the basics;
- Money laundering and how you can prevent it.

For more information please contact Lisa at lisa@bccaco.uk or call her on 07738 948215 and she will be very happy to help.

BCCA Training Plan for 2016

March 2016

For booking forms go to www.bcca.co.uk/event/training

Date	Training	Member	Non-member	Length	Times	Venue
Wednesday 16 March 2016	Debt Collection	£165 + VAT	£250 + VAT	2 hours	10:00 – 12:00	Nottingham
Wednesday 16 March 2016	Data Protection	£165 + VAT	£250 + VAT	2 hours	12:45 – 14:45	Nottingham
Wednesday 23 March 2016	Anti-Money Laundering	£165 + VAT	£250 + VAT	2 hours	10:00 – 12:00	Leeds

April 2016

Date	Training	Member	Non-member	Length	Times	Venue
Wednesday 20 April 2016	FCA Consumer Credit Sourcebook (CONC) including financial promotions	£250 + VAT	£350 + VAT	3.5 hours	10:00 – 13:30	London
Wednesday 20 April 2016	Regulatory Reporting	£100 + VAT	£150 + VAT	1 hour	14:00 -15:00	London
Wednesday 27 April 2016	Complaints Handling	£165 + VAT	£250 + VAT	2 hours	10:00 – 12:00	Portal Business Centre Warrington
Wednesday 27 April 2016	Data Protection	£165 + VAT	£250 + VAT	2 hours	12:45 – 14:45	Portal Business Centre Warrington

May 2016

Date	Training	Member	Non-member	Length	Times	Venue
Wednesday 11 May 2016	PR/Media Training	£165 + VAT	£250 + VAT	2 hours	10:00 -12:00	Leeds
Wednesday 11 May 2016	CEO Briefing	£50 + VAT	£100 + VAT	2 hours	12:45-14:45	Leeds

June 2016

Date	Training	Member	Non-member	Length	Times	Venue
Wednesday 15 June 2016	Dealing with vulnerable consumers (Provided by Anthony Sharp of ASA Associates and Chairman of the MALG)	£250 + VAT	£350 + VAT	7 hours	9.30 - 16:30 (inc 45 minutes lunch)	London
Wednesday 22 June 2016	Third Party Cheque Cashing including AML and Data Protection	£250 + VAT	£350 + VAT	3.5 hours	10:00 – 13:30	Nottingham

20% discount available on upfront multiple bookings subject to the following: Members must book onto three or more FCA training courses, with a minimum of two delegates on each.



Bespoke Training – BCCA is able to offer bespoke training courses developed for your business & delivered at your own premises. If you are interested in this service please give us a call on 01925 426095 to discuss your requirements.
Please note BCCA provide Certificates of Training for all attendees.

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LexisNexis Risk Solutions



LexisNexis is a leader in supplying essential information to help customers fulfil many

business needs including identity verification, fraud investigation, debtor tracing and data cleansing.

Combining cutting edge technology, unique data and advanced scoring analytics, our products and services are employed by a wide range of organisations in the credit and alternative finance industries.

DJS Limited



DJS Limited is a bespoke software solution, which utilises real time device checking to combat fraud and to increase responsibility in the lending

decision process. The solution has been developed to help Short Term Lenders make better, more informed and more responsible decisions with the vital information that was previously not available. DJS Limited give the business intelligence to help lenders be more responsible, combat fraud and save money on the front and back end of their underwriting process. They can be contacted through their website at www.djslimited.co.uk

Motormile Finance UK Limited



Motormile Finance UK Limited are a Leeds based buyer of delinquent debts across varying industries. With strong investment in I, Data and Compliance

controls; MMF can offer a first class offering to anyone looking to inject liquidity into their bottom line by way of debt sales. We act on potential purchases quickly and in a manner that mitigates unnecessary interruptions for the selling company. For debt sale enquiries please contact Neil Petty of MMF UK Limited by email or by calling Neil on 07970 740360, or direct on 0113 224 8551, or visit their website www.mmmile.com

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Contact Ian Wilson, Director of Sales, UK and Ireland, through sales@hiteclabs.com, or go to their website www.hiteclabs.com.

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RevUP Media



Celebrating 5 Years in the UK Lending Market

Celebrating 5 years in the UK, RevUP Media has successfully applied decades of experience in sub-prime lending and online marketing to bring value to lenders of all sizes. From smaller niche

lenders, to publicly traded companies with multi-million pound marketing budgets, and everyone in between, we bring superior service to you. Leveraging our experience in all online media channels, RevUP Media leads the way in compliance, customer service and reliability. Please contact us to find out how we can help you grow at business@revupmedia.com or +44 800 471 4758.

SLL Capital



SLL Capital purchase historic debt up to 4 years old and can facilitate

forward flow arrangements. We understand the importance of protecting a brands reputation and the FCA requirements in treating customers fairly and customer forbearance.

We will consider all sizes of debt portfolios from 50 to 50,000 accounts, we have found that many companies prefer to “dip a toe in the water” when selling debt for the first time and we have found this approach very beneficial in getting to know each other.

Call Mark or Nigel Bryant with any debt selling queries on 020 8253 4131 or 07799 103815

Stand out from the crowd

Special Offer

20% discount for first time advertisers*

*applies to first advert only

Prices start from £200

*All rates are subject to vat

For further information, please visit our website at www.bcca.co.uk or contact Brian on 01925 426 092 or email brian@bcca.co.uk



BCCA Board of Directors

Chair



Richard Fuller

Richard's 20-year career in retail financial services includes 15 years with DFC Global Corporation (to March, 2008), where he served in various operational, functional, and senior management positions in both the UK and Canada. Since 2010 he has been Managing Director of Cash Shop Limited a 14-store chain based in Nottingham.

Vice-Chair



Nigel Bryant

Nigel's education in consumer credit began with door step collecting and in 1989 he founded Safeloans Limited, a fully online operation offering short term payday loans. As a Director he is involved in all daily operations. He enjoys weekends and impromptu family camping outings.

Treasurer



Josef van Niekerk

Josef has extensive knowledge of and experience in the financial services industry, particularly in short term high cost credit and card processing. He holds an MSc in Mathematics, has a strong interest in analytics and big data and is the Business Development and Analytics Manager at Uncle Buck Finance LLP.



Chris Powley

With more than 25 years' experience operating within the financial services sector, Chris has held senior management positions within Lloyds banking group and Norton Finance Loans and Mortgages. Currently, Head of Personal Finance with Cash Converters UK Ltd, Chris has played a prominent role within the industry, recently assisting the FCA and CMA with their respective reviews of the HCSTC market.



Graham Muir

Graham was with Lloyds Banking Group for 10 years within the Asset Finance division. With an extensive background in Collections, Graham started in the High Cost Credit industry in 2008 leading to joining Trusted Cash Ltd in 2012.

An expert in coaching, Graham is passionate about providing good customer service and has created the first, innovative customer reward programme within the High Cost Credit industry. Grahams interests outside of finance are following Hibernian FC and current affairs.



Mark Hannay

Following 5 years in private equity, investing in consumer finance businesses and their receivables, Mark was part of the founding management team that set up Active Securities in 2009 to leverage the tech opportunities presented by high cost short term credit. Since 2013 Mark has overseen the expansion of the origination side of the business into other geographic territories and asset classes.



Shaun Peake

Shaun has over 15 years experience in financial services holding posts at Chartered Trust, HFC Bank and Fowlers Finance before joining Provident Financial plc in 2008. Since 2011 Shaun has been a part of the senior management team at Cheque Exchange Limited. Shaun is an avid follower of Stoke City Football Club.



Can your Loan Management System take your customers on a journey Payday Loan • Instalment Loan Guarantor Loan • Secured Loan

Our experience and knowledge of the instalment credit market means that our **Sentinel** system is capable of handling a multitude of different loan agreement types as standard.

This flexibility is at its core assisting you to drive your lending business forward through the changes required by the FCA.

The adaptability means that it provides an end-to-end solution with web services enabling applications from customers, lead generators, brokers and affiliates and a back office function taking your customer from their initial application and underwriting through payment collections and arrears management to settlement.

It is already the system of choice for over 200 companies. Why not call us to see why these companies chose **Sentinel**.

For further information on how Sentinel can help your business contact:

Mike O'Sullivan 01248 672940
07854 955070

Alternatively email
enquiry@anchor.co.uk