

Consumer Duty compliance: Data driven strategies to turn FCA insights into action

Wednesday 30 April 2025



Housekeeping

- Audio check
- Please ask questions throughout
- Short survey
- Aim to finish by 11.45
- Slides and recording will automatically follow
- Connect with us on X @policy_practice and LinkedIn

We empower people

Policy

£23 billion of support is unclaimed each year

Read our analysis

Practice

Smart products help our clients efficiently close this unclaimed support gap

View our Better Off platform





Agenda

- Context on the FCA review: Kevin Still, Director, Consumer Duty Services DEMSA
- KYVC Turning Data into Action: Stuart Murgatroyd, Founder and CEO, Data On Demand
- Identifying and categorising the different types of vulnerabilities: Andrew Gething,
 Founder and MD, MorganAsh
- Best practice and MI for income maximisation: Stuart Bungay, Policy in Practice
- Discussion and Q&A



Today's speakers











Rob Johnson
Business
Development
Manager
Policy in Practice

Kevin Still
Director
Consumer Duty
Services and DEMSA

Stuart MurgatroydFounder and CEO
Data on Demand

Andrew Gething Founder and MD MorganAsh

Stuart BungayFintech Consultant
Policy in Practice



Kevin Still

Director
Consumer Duty Services
and DEMSA



policyinpractice.co.uk





Delivering better outcomes with integrity



www.consumerdutyservices.com enquires@consumerdutyservices.com



Consumer Duty compliance: Data-driven strategies to turn FCA insights into action

Kevin Still

30 April 2025

DEMSA Consumer Duty Services



Cultural challenge into H2 2025





A more consumer-focused marketplace:



Consumers' interests at the heart of target operating models



Lots of 'warnings', but plenty of 'abstract thinking'





Focus on delivering good outcomes for consumers with no 'sludge' practices



Geared to consumers making informed decisions



Products & services providing Fair Value



Quality and intelligible (good comms) support focused on diverse (e.g. accessibility) needs at every stage



"Al presents opportunities for firms who are thinking creatively about opportunities for innovation and efficiencies"

Consumer Duty Board Reports – 11/12/2024





Areas of improvement:

- Strengthen governance
- Fully embed Duty in strategies
- Improve data quality
- Tailor vulnerability support
- Look at whole distribution chain

3 cross-cutting projects to end of 2024/25:

- Review of board reports and complaint handling/root cause analysis
- Review of treatment of customers in vulnerable circumstances
- Review of consumer support outcomes and supporting informed decision-making

Published on 7 March 2025

"To support effective embedding and implementation of the Duty, firms have asked us to more regularly publish thematic best practice and areas for improvement. This report is being published so that everyone can learn and improve."

FCA 5-year strategy - now 'growth' focused





The FCA's Strategy 2025-2030 focuses on deepening trust, rebalancing risk, supporting growth, and improving lives.

The strategy outlines 4 main priorities:



Smarter regulation: Becoming more efficient by embracing technology and improving processes



Supporting growth: Encouraging investment, innovation, and competitiveness within the financial services sector



Helping consumers: Enhancing trust, product innovation, and ensuring consumers have the right information and support



Fighting financial crime: Disrupting criminals and supporting firms to protect against harm



"Over 7m people in the UK report struggling to pay their bills or debts. Many would struggle to deal with a financial shock. Innovative, competitive financial services help by providing the products people need to improve their financial lives"

https://www.linkedin.com/pulse/fca-5-year-business-strategy-out-consumer-duty-services-wo5dc/https://www.fca.org.uk/publications/business-plans/annual-work-programme-2025-26
https://www.fca.org.uk/news/news-stories/next-steps-consumer-duty-rule-review
https://www.gov.uk/government/publications/public-sector-toolkits/debt-management-communications-toolkit-v1

The debt sector journey to April 2025

- The sector "Dear CEO" letter from 23 February 2023 over 2 years ago
- The Duty goes live for our 'open' DMP books at the end of July 2023
- The FCA run a webinar in December 2023 with key sector messages from Roma Pearson
- Consumer understanding event in February 2024 with StepChange and Amplified Global
- Data requests around Vulnerability Management and Consumer Support in May and June 2024, including October 2024 follow-up requests on Consumer Support
- Requests for Duty Board packs in July and August 2024
- Fair Value Assessment (FVAs) requests in October 2024
- PS24/2 (Borrowers in Financial Difficulty) implemented in November 2024
- Prototype around business models as part of CP24/19, replacing current RegData returns
- Firm specific data requests around **financial promotions**, supply chains and annual reviews
- Follow-up interviews on FVAs and QA Framework data requests in February 2025
- FCA releases on 7 March Vulnerability reports and Consumer Support findings
- Regulatory initiatives grid, 5-year business plan, 2025/26 action plan in April 2025

Annex 2

"Income maximisation (where the firm identifies potential additional income, such as unclaimed benefits) and budgeting advice are particularly important..."

Also references Debt Respite Scheme and Illegal Money Lending

https://www.fca.org.uk/publication/correspondence/ consumer-duty-letter-debt-advice.pdf



Monitoring outcomes







- 40-65% of consumers reported that digital services do not meet their needs.
- 50% of the population may display vulnerability characteristics, which need to be accounted for by firms.
- 48% of firms offer dedicated telephone support for vulnerable customers.
- 44% provide dedicated email support for vulnerable customer groups.
- 66% of firms surveyed have specialist training for identifying and supporting vulnerable customers.

Key Takeaways

- Vulnerability is Dynamic: Identifying and addressing vulnerability requires continuous adaptation
- Training and Empowerment: Effective training, is crucial for staff to respond to customers' needs
- Tailored Support: Tailored support for vulnerable customers, has led to better customer outcomes.
- Monitor Outcomes: Many firms still lack effective systems to track and act on the outcomes. This should go beyond transactional measures.
- Technology: Digital solutions can improve service, yet must be accessible. Consider non-digital alternatives too.
- Importance of Data: Effective data collection, particularly granular data on vulnerable customer cohorts, is essential for improving service and outcomes.

"Most firms in our multi-firm work into outcomes monitoring were unable to show how they effectively monitor and take action on outcomes for customers in vulnerable circumstances"

"Only 39% of firms had formal governance bodies or committees that oversee and can influence outcomes for customers in vulnerable circumstances"

FCA vulnerability webinar recording from 11 March 2025:

https://webinars.fca.org.uk/the-vulnerability-review-findings/room

https://www.fca.org.uk/publications/good-and-poor-practice/delivering-vulnerable-customers – 7/3/2025 https://www.fca.org.uk/news/news-stories/review-firms-treatment-customers-vulnerable-circumstances - announced 15/3/2024

Product Sales Data at a credit agreement level







PS24/3: Consumer Credit – Product Sales Data Reporting



Policy statements

First published: 29/04/2024

Last updated: 15/05/2024

See all updates

We set out our final rules and guidance for incorporating 3 new Product Sales Data (PSD) returns into our Supervision manual (SUP 16).

Read PS24/3

Excel version of the data elements (xlsx)

See PS24/3: Sales Data Flow Diagram (PDF)

See PS24/3: Performance Data Flow Diagram (PDF)

See PS24/3: Back-book Data Flow Diagram (PDF)

PSD returns will require firms to provide detailed information on the initial sale, and ongoing performance, of individual agreements.

With this enhanced data, the FCA will be able to:



better understand how firms operate and gain more insight into the market



authorise and supervise firms more effectively



intervene more quickly and boldly where we have identified risk of harm in the consumer credit market



reduce our reliance on ad hoc requests for more information from firms





Stuart Murgatroyd

KYVC – Turning Data into Action

Founder and CEO Data on Demand

policyinpractice.co.uk





KYVC: Turning Data into Action

- Multiple data sources combined
- Identifies characteristics of vulnerability
- Builds holistic, granular consumer profiles
- Real-time insights for support teams

Who is KYVC for? Gambling & Financial **Utilities &** Pension Fraud Local Insurance Services Telcos Government **Providers Providers** Prevention Gaming Under the FCA's Consumer Duty, firms must proactively monitor customers KYVC insights also play a crucial role in shaping Board reports, where to identify financial vulnerability. Detecting early warning signs enables Directors must demonstrate how they support vulnerable customers and financial services to intervene before payment defaults or escalating debt. enhance their vulnerable customer strategy. These insights provide KYVC insights closely align with the FCA's Characteristics of Vulnerability, actionable data to help firms meet governance obligations and drive supporting firms in meeting regulatory expectations. continuous improvement in customer outcomes.



Pinpoint vulnerable customers:

Use KYVC to identify real customers facing financial, mental, or physical challenges so you can help them.



2

Achieve appropriate vulnerability metrics:

Every organisation has distinct targets
– with KYVC your organisation can
scale vulnerability identification in line
with its objectives.



3

Meet regulatory expectations:

KYVC enables you to demonstrate your organisation is proactively identifying people with characteristics of vulnerability.



Better customer outcomes:

Better customer outcomes: Deliver timely support and unlock benefits and savings for your customers to enhance their financial well-being.



5

Gain advanced data insights:

KYVC uncovers hidden vulnerabilities and identifies customers unaware of their eligibility for support.

Get your FREE KYVC report today – uncover the customers you're missing who deserve your support.

Get you free report

What KYVC insights reveal

10 insights KYVC can help you identify in your customer base

KYVC delivers real-world, data-backed insights that organisations can act on immediately.

- Individuals who have lost their jobs in the last 30 days
- People whose most recent loan application is for high-cost credit to pay household bills
- Customers who need a short-term loan to pay their rent or mortgage this month
- People who have recently suffered a bereavement or a relationship breakdown

- 5 Victims of fraud or coercion
- Demographic groups at greater risk of harm
- Households with low financial resilience
- People entering Debt
 Management Plans
 and IVAs

- Customers with limited capability to access your services
- People who have reported mental and physical disabilities

Improve customer experiences

KYVC helps you streamline onboarding and proactively monitor vulnerability throughout the customer lifecycle by:



Identity

Identifying financial risk factors and customer vulnerabilities at onboarding to ensure customers receive appropriate products and support from the outset.

Monitor

Continuously monitor vulnerability levels, allowing you to adapt support as required by identifying customers' changing circumstances.

Assist

Gain tailored insights to inform intervention strategies, ensuring customers at risk of financial distress receive proactive, meaningful assistance.



Track and adjust customer vulnerability percentages:

Reach appropriate internal vulnerability targets or those set by the regulators.

Not all organisations have the same vulnerable customer targets, and KYVC recognises this.

KYVC offers access to a wide range of vulnerability indicators, allowing you to target specific customer segments aligned with your strategy or regulatory goals.

You can scale the level of vulnerability identification up or down to match your organisation's needs.



Gain structured, auditable reports for regulators:

Provide evidence of compliance with confidence.

KYVC offers actionable insights to audit your customer database—enabling before-and-after comparisons.

Generate daily, weekly, or monthly reports to track changes in customer vulnerability.

Especially for FCA-regulated businesses, KYVC helps demonstrate progress in vulnerability strategy at Board Level.

Create data-driven reports that highlight improvements and regulatory alignment.



Ensure proactive identification, not reactive responses:

Identify vulnerable customers before problems escalate.

According to the Financial Lives Survey 2020:

53% of UK adults displayed characteristics of vulnerability in October 2020.

Yet, only 13% recognised themselves as vulnerable.

That means 76% of vulnerable individuals do not perceive themselves as such.

Many hesitate to disclose vulnerability due to fear of negative consequences from providers.

KYVC identifies these customers early—so you can support them before issues worsen.

Key vulnerability insights measured

Know Your Vulnerable Customer is a central hub for vulnerability insights, giving you a comprehensive view of financially at-risk customers. It combines multiple alternative data sources to provide an accurate assessment of vulnerability in real time while also helping you identify customers who may be missing out on unclaimed benefits or savings that could improve their financial well-being.

#1. Challenging circumstances

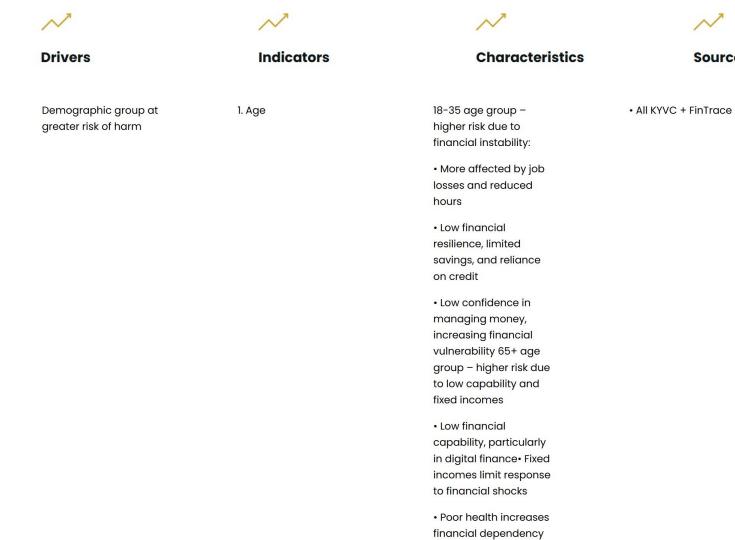
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Drivers	Indicators	Characteristics	Source
Low financial resilience	1. New high-cost, short-term application	Low savings, i.e. if the main source of household income	• iDVu • Infinian
	2. Loan application for emergency expense	were lost, their household could continue to cover living expenses for less than	• The VRS
	3. Loan application for short-term cash	a week without having to borrow any money or ask for help from friends or family	
	4. Loan application for reduced income		

~	~	~	~
Drivers	Indicators	Characteristics	Source
Low financial capability	1. Loan application to repay debts 2. Loan application to pay household bills 3. Loan application to cover rent/mortgage 4. Debt Relief Order 5. Debt Management Plan 6. Individual Voluntary Arrangement	Over-indebtedness i.e. keeping up with domestic bills and credit commitments is a heavy burden, and/or payments for any credit commitments and/or any domestic bills have been missed in any three or more of the last six months	 iDVu Infinian The Insolvency Service The VRS
Working status	 Self-employed Part-time employment Temporary employment 	Low or erratic income, i.e. having difficulty paying for day-to-day expenses, being unable to withstand even a £50 reduction in their income or struggling if their	• iDVu • Infinian

main source of household income were lost for even a

week

~	~	~	~
Drivers	Indicators	Characteristics	Source
Financial disruption	 Change in employment status from full time/permanent to part time or temporary Loan application for reduced hours Unemployment Bankruptcy 	Income shock i.e. one or more of the following events experienced by an adult (or their partner) in the last 12 months: Losing a job or being made redundant, reduction in working hours (against wishes) or bankruptcy in last 12 months	 iDVu Infinian The Insolvency Service
Income source	1. Benefits2. Pension	Low or erratic income	• iDVu • Infinian



Source

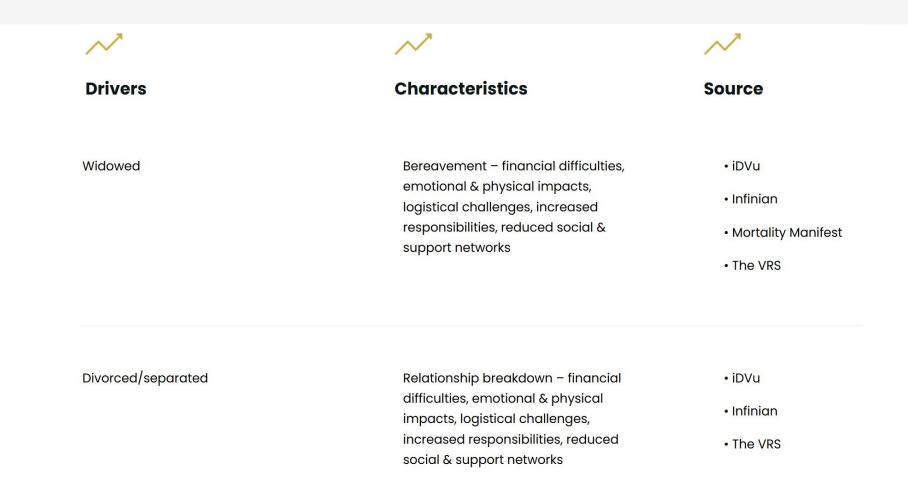
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Privers	Indicators	Characteristics	Source
Lone parent	1. Single, divorced/separated/wi dowed with 1+ dependant	Child caring responsibilities, i.e. an individual living in a one-adult household who is the main provider of daily care and financial support for a dependent child.	• iDVu • Infinian
Older carer	1. Aged over 60 with 1+ dependant	Adult caring responsibilities, i.e. an adult (or their partner) becoming the main carer for a close family member in the last 12 months	• iDVu • Infinian
Demographic group at greater risk of harm	1. Low household income	Household income under £15,000 per annum	• iDVu • Infinian

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Drivers	Indicators	Characteristics	Source
General capability	1. Accessibility 2. Cognitive Disorder 3. Dyslexia 4. Limited or No English 5. Limited technological capability 6. Low level of literacy 7. Low level of	Household income under £15,000 per annum	• The VRS
Trauma	numeracy 1. Coercion 2. Victim of Fraud	Unexpected or distressing situations.	• The VRS

~	~	~
Drivers	Indicators	Char
Health	 Addiction to alcohol or drugs 	Physi healt
	2. Corona Virus	
	3. Gambling addiction	
	4. Hearing – Deaf	
	5. Hearing – Partially Deaf	
	6. Loneliness/isolation	
	7. Mental health	
	8. Neurodevelopmental disorders	
	9. Old age	
	10. Physical disability	
	11. Physical health	
	12. Sight – Blindness	
	13. Sight – Partial sight	

characteristics Source Physical and mental nealth issues.

#2. Negative life events





~

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Drivers

Characteristics

Source

Unemployment

Loss of income – financial difficulties, emotional & physical impacts, logistical challenges, increased responsibilities, reduced social & support networks • iDVu

Infinian

Retirement

Retirement – financial difficulties, emotional & physical impacts, logistical challenges, increased responsibilities, reduced social & support networks

• iDVu

Infinian

Identifying customers eligible for benefits

Benefit	Outputs	Description	Source
Universal Credit	1 or 0, £	1' signals it is likely the individual is entitled to the benefit, and an expected value is calculated	Policy In Practice
Pension Credit	1 or 0, £	'1' signals it is likely the individual is entitled to the benefit and an expected value is calculated	Policy In Practice
Council Tax Reduction	1 or 0, £	'1' signals it is likely the individual is entitled to the benefit, and an expected value is calculated	Policy In Practice

The data behind KYVC

We incorporate the best alternative vulnerability data sources for your strategy so you'll uncover those customers who may be overlooked when relying solely on Credit Reference Agency data.















Success in action

UK Power Networks enhances support for vulnerable customers

KYVC's comprehensive vulnerability assessment measures risk across many challenging circumstances and negative life event flags, allowing businesses to act with precision and confidence.







To support this initiative, UK Power Networks leveraged comprehensive data insights in two key areas:



Identifying customer vulnerabilities



Reduce stress during power outages

Project results

The collaboration has yielded impressive early results:

1M+

Over one million potentially vulnerable customers were identified.

PSR+

Substantial increases in PSR sign-ups, ensuring that more households have access to the support they need.

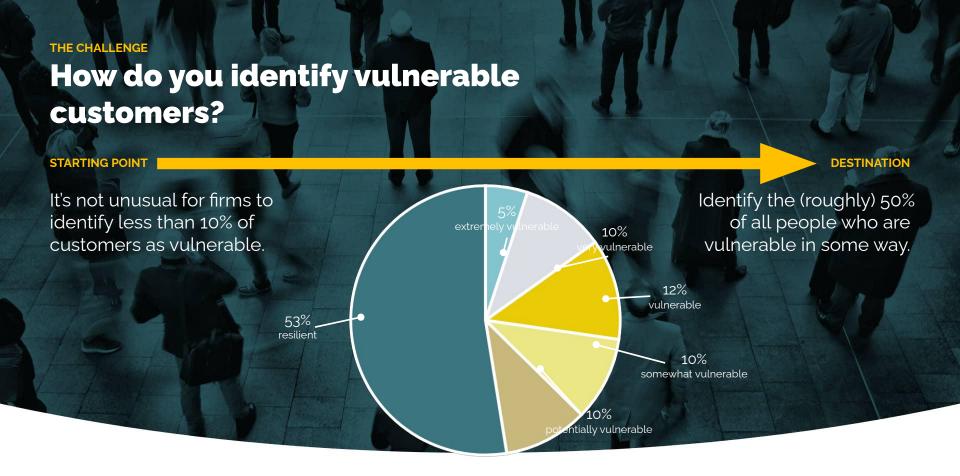


Andrew Gething

Identifying and categorising the different types of vulnerabilities

Founder and MD MorganAsh





THE POSSIBLE

Compliant firms know who is vulnerable, with a granular understanding of severities.

THE CHALLENGE

How do you understand individuals' vulnerabilities?



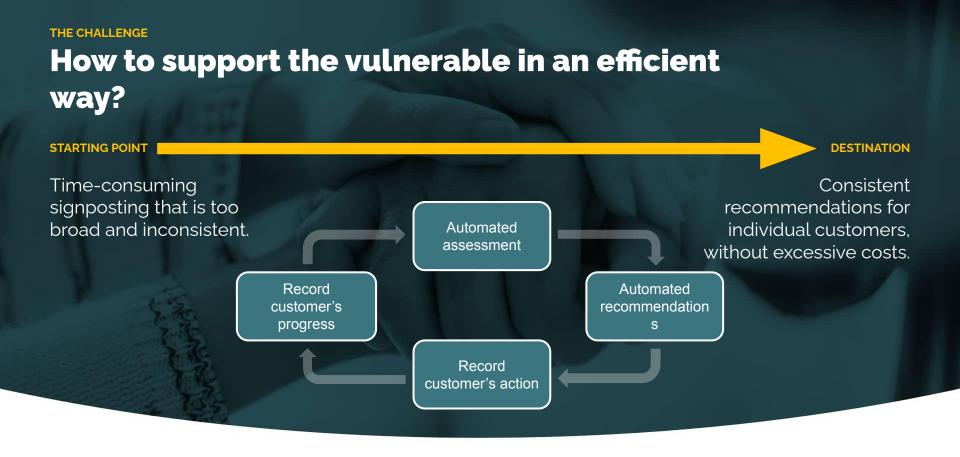
THE POSSIBLE

Structured data provides an accurate and consistent understanding of consumers.



THE POSSIBLE

Easily and legally share the detail needed by team members, departments and firms.



THE POSSIBLE

Automated company vulnerability policy recommendations, in real-time, as required.

How to monitor, report and manage the vulnerable? STARTING POINT DESTINATION A lack of consistent and Easily evidence management of accurate data impedes vulnerable customers, for both actions and reporting. compliance and to prioritise actions. Compared to FCA's Financial Lives survey Recorded vulnerability (1-6) FCA vulnerability

THE CHALLENGE

THE POSSIBLE

Detailed data and reporting on vulnerability characteristics, severities and mitigation actions.



How to produce vulnerable cohort outcome reporting?

STARTING POINT

Limited understanding of how outcomes impact vulnerable cohorts.



DESTINATION

Granular understanding of outcomes for different consumer cohorts, to help identify areas for improvement.

THE POSSIBLE

Granular outcome feedback, by comparing outcome data with detailed characteristics data.



THE POSSIBLE

Vulnerable customer management: a key part of company culture and across the value chain.



Stuart Bungay

Introducing the Better Off Calculator

Fintech Consultant Policy in Practice



Core Financial Services Benefit Calculator Use Cases

Collections & Recoveries

Many individuals in collections would benefit from a welfare / support assessment, but the complexity of the journey often makes this difficult for both parties to complete.

Our targeted approach enables creditors to understand which customers are most likely to benefit and can then look to target these customers to go through the assessment journey, without impacting those for whom benefits are not available.

Pre-Arrears

In pre-arrears, many financial services organisations have tools and models to help them understand which customers are likely to enter into arrears. Often, however, there are limited tools to change this path for individuals.

Income maximisation through the benefits calculator can make a material difference to that outcome when applied to the right individuals at the right time

Persistent Debt

Since the FCA introduced the regulations around persistent debt, creditors have a duty to help individuals with sustained credit card debt to exit that situation.

Again, targeted assessment based on probability can play an important role in supporting a holistic solution.

Declines

Lenders are increasingly looking for opportunities to support customers who they decline during the loan application process.

Depending on the reason for the decline decision, income maximisation can provide valuable support for the individual and may even enable that potential customer to become a customer in the future. Which is great for the customer and can lower overall acquisition costs.

BENEFITS ASSESSMENT & INCOME MAXIMISATION

The Core Benefits Assessment Process

Better Off Score

Use our Better Off Score to identify those individuals likely eligible for benefits

This can highlight missed opportunities and guide customers to unlock extra income

Better Off Indicator

A lightweight, front-end tool designed to quickly assess basic eligibility.

Ideal for embedding in existing customer journeys or digital advice / support tools.

This provides customers with an estimated eligibility.

Better Off Calculator

The most comprehensive self service income maximisation tool on the market, covering central government benefits, local support (e.g. council tax reduction), grants, and water/social tariffs.

This provides customers with an accurate view of their eligibility.

Apply Once

Single digital entry point: Customers provide their information once.

Data shared across support schemes: With consent, information is used to apply for multiple benefits, grants, and discretionary support without the need to re-enter details.

Offline Supported Journeys

Whilst we are digital first, we have tools and partners to enable a seamless offline benefit assessment experience helping to reduce the barriers to accessing support where needed

BENEFITS ASSESSMENT & INCOME MAXIMISATION

Income Maximisation Impacts

Improved Individual Finances

Obviously the most important impact of the income maximisation process is the improvement in the financial position of the individual.

This impact can vary depending on the stage in process, but it is likely to be manifested by an overall greater financial resilience.

This supports not only the individual in this moment but also into the future.

Improved Internal Performance

Alongside customer financial improvements, there is a direct impact on company performance with greater individual financial resilience leading to lower arrears, lower breakage on payment plans and a generally greater ability to meet their obligations.

This improves overall financial performance, lowers operational expense and reduces provision charges.

Regulatory Reporting

The final benefit is focused around the organisation being able to evidence to their board and more broadly that they are implementing policies and solutions to improve overall customer outcomes.

We have a number of clients now who use our reporting suite and customer outcome data as a key part of their board reporting to evidence this.



Poll

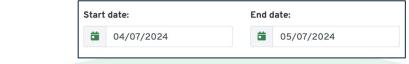
Besides improving customer outcomes, what would your organisation see as the secondary focus of a benefits assessment?

- 1. Internal gains: lower defaults, better repayments
- 2. Ability to evidence support to senior management and regulator

BENEFITS ASSESSMENT & INCOME MAXIMISATION

Reporting Dashboard

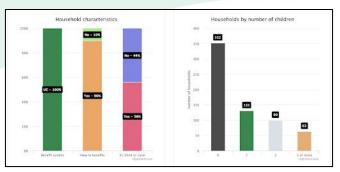
See an overview of the impact for your customers in real time

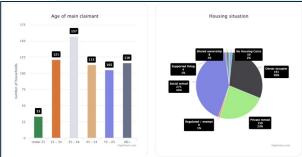




See a breakdown of your impact by:

Customer age
Housing situation
Household characteristic
Number of children

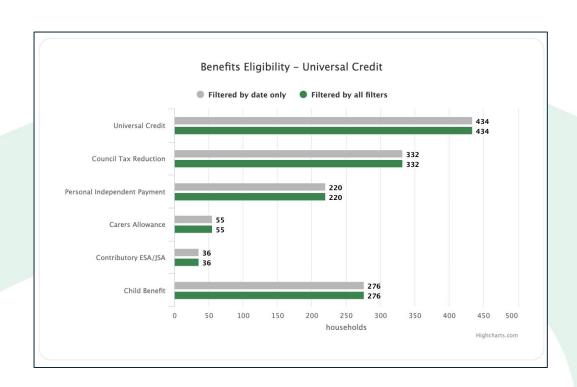




policyinpractice.co.uk

Reporting Dashboard

Understand the breakdown of eligibility by benefit type





To explore more book a call via this QR code





Discussion



Next steps

Take our very short survey when the webinar ends to:

- Give us feedback and ask further questions of our speakers
- Book a chat with the team.



Register for our next webinars:

Wed 21 May: Harnessing data for regional impact: empowering local leaders to drive change





Thank you to our speakers

Kevin Still, Director, Consumer Duty Services and DEMSA Stuart Murgatroyd, Founder and CEO, Data on Demand Andrew Gething, Founder and Managing Director, MorganAsh Stuart Bungay, Policy in Practice

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