

Payment protection insurance complaints deadline Progress Report

October 2018

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1 Overview

Purpose of this report

- 1.1** This report provides an update on the progress of our consumer communications campaign and supervisory work in support of the 29 August 2019 deadline for PPI complaints. It covers:
- The campaign so far and how consumers are responding to it.
 - Our supervisory work to ensure firms are helpful and accessible to consumers who have decided to act, and are dealing fairly and consistently with them.
 - The actions consumers have taken since the start of the campaign and the outcomes they are getting.
- 1.2** We also set out our plans leading up to the 29 August 2019 deadline and beyond.

Background

- 1.3** On 29 August 2017, we launched the package of measures we had finalised and set out in March 2017,¹ namely:
- A deadline of 29 August 2019, by which consumers will need to make their PPI complaints or lose their right to have them assessed by firms or the Financial Ombudsman Service.
 - An FCA-led large scale communications campaign, funded by firms at a cost of £42.2m,² to inform consumers of the deadline and help prompt them to decide whether to act.
 - Rules and guidance on the fair handling of PPI complaints in light of Plevin (the Supreme Court judgement about lenders' undisclosed PPI commissions³), including a requirement for firms to write to previously rejected mis-selling complainants who can complain again in light of Plevin to explain this to them.
 - We took these measures to prompt into action many consumers who want to complain or check if they had PPI but have not yet done so, and to bring the PPI issue to an orderly conclusion.

1 www.fca.org.uk/publication/policy/ps17-03.pdf

2 This money has been raised through a special fee rule applied in June 2017 to the 18 PPI firms who together receive around 90% of all PPI complaints.

3 The Supreme Court judgment in November 2014: Plevin v Paragon Personal Finance Limited [2014] UKSC 61.



1.4 We have supported these measures and aims by:

- tracking the progress and impact of our campaign, including consumers' awareness of the deadline, and refining the campaign where necessary
- carrying out a robust supervisory strategy to ensure firms are helpful and accessible to consumers, including vulnerable consumers, and are dealing fairly with their PPI checking enquiries and complaints
- consulting more recently on guidance to address a specific area of uncertainty about the handling of certain regular premium PPI complaints in light of Plevin⁴

4 <https://www.fca.org.uk/publication/consultation/cp18-18.pdf>

2 Executive Summary

Our communications campaign



- 2.1** We are encouraged by the results of the first year of our campaign. Featuring Arnold Schwarzenegger's animatronic head, the campaign has increased consumers' awareness of the deadline and improved their understanding of PPI and how to check if they had PPI. We are confident it is prompting consumers to make a decision about PPI before the 29 August 2019 deadline.
- 2.2** Over the course of its first year, the campaign has been developed and refined in response to insights from our tracking survey and analytics from our website and contact centre. This approach helps to ensure our messages reach and are understood by our wide range of audiences, and has identified where we need to do more to increase awareness and understanding among certain audience groups.
- 2.3** To ensure that our advertising, website and consumer information leaflets reach and engage vulnerable consumers and those with protected characteristics, we are using adapted communications and have partnered with 22 third sector organisations. We would like to thank those partnership organisations for their continued support.
- 2.4** As we move into the second year of our campaign, we aim to continue the positive trend of increased awareness and improved understanding, in particular among black and minority ethnic consumers (see the Update on our Equality Impact Assessment at Annex 1).
- 2.5** Our focus will be on strengthening consumers' understanding of what to do before the deadline and how to make a PPI complaint.



Our supervisory work

- 2.6** We have monitored and challenged firms to ensure that they are making it easier for consumers who decide to act to do so, and handling consumers' checking enquiries and complaints fairly.
- 2.7** Firms have responded positively to our aims and measures. Through our supervisory work, we have seen that firms have:
- improved the way they present key information on their PPI websites, including about their various (and sometimes historic) sub-brands
 - improved accessibility and ease of use of checking enquiry and complaints processes, for example by providing an online checking enquiry submission facility
 - improved information and assistance for vulnerable consumers, including providing reasonable adjustments to information formats
 - correctly identified and mailed 1.3m previously rejected mis-selling complainants to tell them they can make a new complaint in light of Plevin
 - assessed checking enquiries and complaints promptly, despite increased volumes
 - provided thorough checks in response to enquiries, and given answers that are in most cases accurate
 - assessed and redressed complaints fairly and consistently, including in light of Plevin
 - improved their performance at the Ombudsman Service, which is now over-turning or amending far fewer complaint decisions from firms

Consumers' actions and outcomes

- 2.8** There has been an increase in consumer action. In the 10 months since the campaign's launch:
- 8.4m checking enquiries were made, with monthly volumes 40% up on their immediate pre-campaign level
 - 3.7m complaints were made, 63% up on the 10 months before the campaign
- 2.9** More consumers are complaining themselves, rather than using claims management companies (CMCs). 55% of complaints have been made directly by consumers, compared to 45% before the campaign. This means tens of millions of pounds of additional redress will stay with those complainants rather than being paid to CMCs.
- 2.10** On outcomes, we have seen that those complaints assessed for mis-selling are upheld and redressed in nearly 75% of cases, and those assessed in light of Plevin are upheld and redressed in nearly 66% of cases.

- 2.11** In total, over 80% of PPI complaints are currently being upheld and redressed.
- 2.12** £3.7bn of redress has been paid in the 10 months since the start of the campaign, 64% more than in the 10 months before it.

Conclusion

- 2.13** We are making progress in line with our aims. We are successfully prompting consumers who wanted to complain or to check if they had PPI to do so. And complaints handling is now more efficient. For example, the increase in the number of consumers checking before complaining has meant fewer complaints are being rejected as 'no PPI' (ie the complainant never had PPI). This is saving both consumers and firms time and effort.
- 2.14** Consumers are getting fair and consistent outcomes at the earliest stages in the checking and complaints processes, including in light of Plevin. Additionally, a greater share of redress is now being paid directly to consumers, rather than to CMCs.
- 2.15** Overall, the PPI issue is being brought to an orderly conclusion in a way that secures appropriate protection for consumers and enhances the integrity of the UK financial system.

Next steps

- 2.16** We are now in year 2 of our campaign. We will continue to assess and improve each phase of it. Our campaign will focus on:
- increasing its impact on certain consumer groups, and
 - strengthening consumers' understanding of what to do before the deadline and how to complain
- 2.17** Our supervisory work will focus on ensuring that firms:
- maintain and further improve their accessibility and handling
 - correct any areas where shortcomings are identified
 - prepare to deal fairly and effectively with complaints in the final run-up to the deadline
- 2.18** Following the deadline, we will publish our final report in early 2020. It will provide a definitive review of the overall impact of our measures and draw the PPI issue to a close.

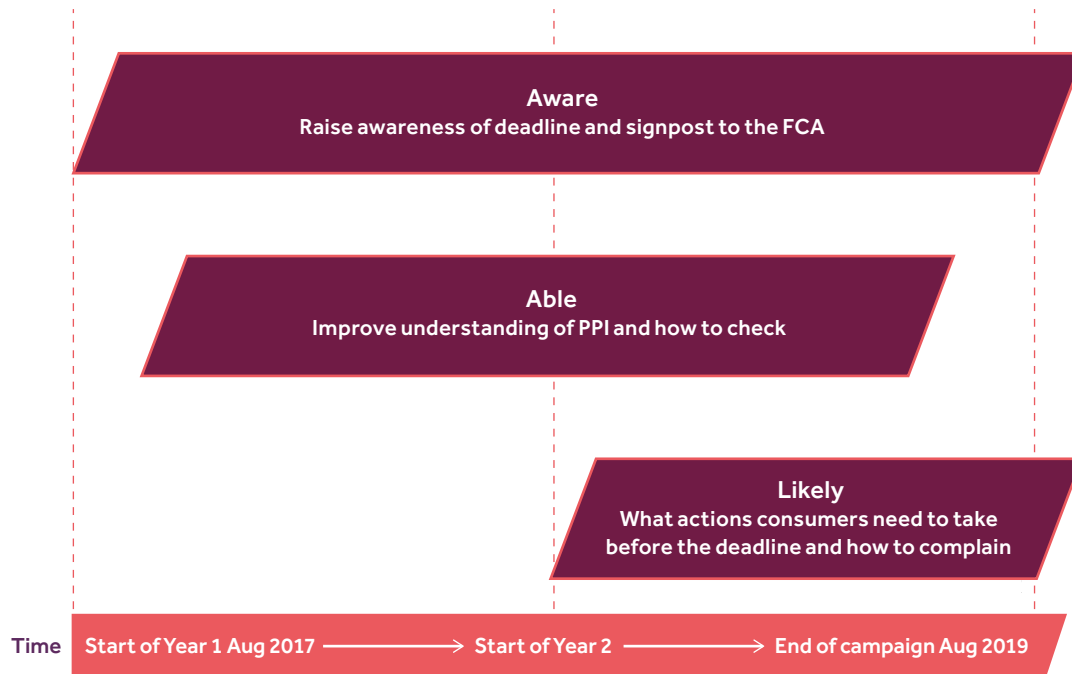


3 Our communications campaign

Background

- 3.1** The main objectives for our PPI deadline communications campaign are to:
- raise awareness of the deadline, to prompt those who intend to complain or to check if they had PPI to act ahead of the deadline
 - provide information to consumers on how to check if they had PPI
 - clarify the PPI mis-selling issue
 - explain clearly how to make a PPI complaint
 - sign-post consumers to appropriate help
- 3.2** To achieve our objectives, we designed a multi-channel communications campaign using a combination of advertising, public relations (PR), social media and partnerships. All channels point to the dedicated FCA PPI website and helpline for all the information consumers need on PPI.
- 3.3** Communications have been designed to reach and engage all UK adults over 25, including vulnerable consumers and those with protected characteristics (see Annex 1 for details).
- 3.4** In year 1, we delivered two phases of advertising. We will deliver two more before the PPI deadline on 29 August 2019, one of which is live in October and November 2018, at the time of publication of this report.
- 3.5** Our focus for year 1 was to establish awareness of the deadline, and improve understanding of PPI and of how to check if you had PPI. We also sought to provide clear signposting to our website and helpline as well as other sources of appropriate help and information, including firms, the Financial Ombudsman Service and the Financial Services Compensation Scheme. We wanted to ensure consumers knew they could come to the FCA for authoritative information on PPI and the deadline.
- 3.6** In year 2, we will continue to raise awareness of the deadline and help consumers decide if they want to make a complaint about PPI. In doing so, the campaign will focus more on strengthening consumer understanding of how to complain and what they need to do before the deadline.

3.7 Our proactive messaging delivery through advertising, PR, social media and partners has been designed to reflect the relative emphasis of our year 1 and year 2 priorities:



Communications campaign results to date

3.8 We use a variety of data to assess and improve each phase of our communications campaign. We conduct national quarterly face-to-face surveys before and after each burst of advertising and monthly online surveys to track month by month trends.

3.9 We also monitor, analyse and apply insights gained from paid media performance data, as well as website and contact centre data. This helps us build a comprehensive picture of the impact of the campaign on consumer attitudes and behaviour.

3.10 The campaign has had a positive impact in year 1 with 73%⁵ (32 million) of the UK adult population over 25 years old recognising our campaign in May 2018. Our paid advertising reached 97% of this same audience⁶ a total of 35 times. The 32 million consumers who recognise the campaign consistently report greater levels of understanding of the issue of PPI, including about checking, complaining and mis-selling.

3.11 Our campaign messages and call to action to contact the FCA for more information is clear:

- 82%⁷ of respondents think it is clear from our adverts that people need to make a decision about PPI
- 80%⁷ believe the FCA website and helpline have more information about PPI

⁵ Base = c. 850 respondents. This is the base for all metrics in this section unless otherwise stated.

⁶ All media reach and frequency figures are obtained from our media buying supplier Manning Gottlieb OMD.

⁷ Base = c. 850 respondents.



Performance against campaign objectives: key performance indicators (KPIs)⁸

KPI	Aug 17 (pre campaign)	May 18
Deadline awareness (aware deadline is in 2019)	53% (6%)	68% (28%)
Understanding of how to check for PPI	73%	79%
Understanding of PPI	75%	82%
Understanding what action needs to be taken before the deadline (year 2 priority) ⁹	29%	23%
Understanding of how to complain (year 2 priority)	42%	44%
Volume of help provided	Web users	1,698,595
	Helpline calls	26,445

3.12 We have seen a positive upward trend against our year 1 priority KPIs: awareness of the deadline, understanding of how to check and understanding of PPI.

- Awareness of the deadline grew by 15%, from 53% at pre-launch in August 2017 to 68% after our second burst of advertising in May 2018
- Understanding of the issue of PPI rose from 75% pre-launch to 82% in May 2018
- Understanding of how to check rose from 73% pre-launch to 79% in May 2018

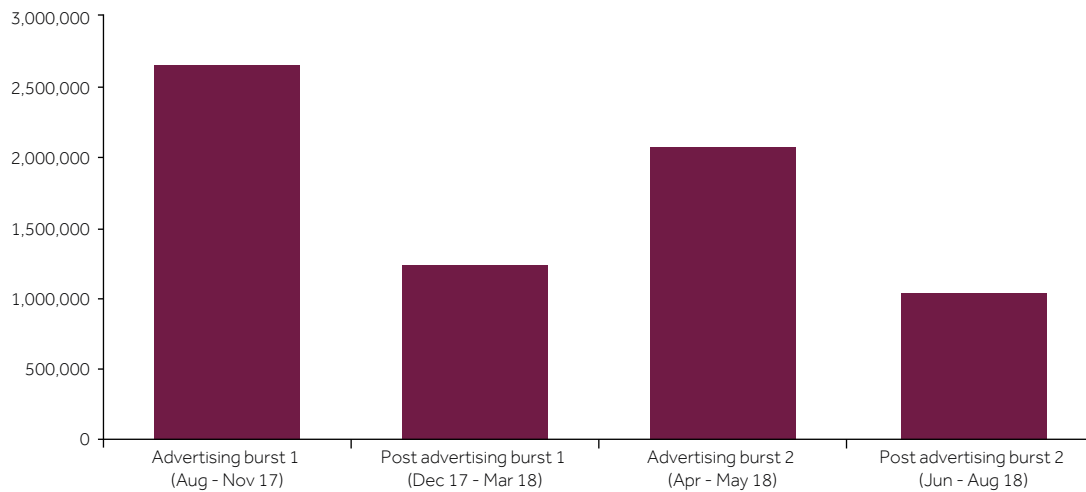
3.13 Total response volume has grown considerably, demonstrating sustained consumer interest in finding out more:

- Visits to our website from campaign launch on 29 August 2017 to the end of our first advertising burst on 5 November 2017 stood at 1,995,277. This grew to a total of 5,701,499 by the end of our second burst of advertising in May 2018.

⁸ See Annex 2 for more details, including questions corresponding to each KPI.

⁹ Base = 447-580 respondents, all those that are aware of a PPI deadline.

Website visits by bursts of advertising



6.7 million total pageviews and
477,545 referrals to firm websites



3.14 We are encouraged by the positive response volumes to our website and Contact Centre:

- Calls to our dedicated PPI helpline for the same period (29 August to 5 November 2017) were 13,394, growing to a total of 26,445 by the end of May 2018

3.15 Customer satisfaction with our helpline and website has been consistently very good:

- 83% found the information on our website useful
- 93% of consumers are satisfied with the service received from our helpline

3.16 However, we continue to work towards further improvement.

3.17 Some of our KPIs have not seen a significant¹⁰ increase in year 1. For example, understanding of how to complain has seen a small increase – from 42% at pre-launch in August 2017, to 44% in May 2018. Our initial advertising was not designed to prompt consumers to find out how to complain. This was because we knew that many people did not know if they had PPI and so would be more receptive to year 1 messaging around the deadline and how to check for PPI. This phased approach to messaging delivery may help to explain the limited increase. We are including explicit messaging about complaining as part of our year 2 campaign communications.

3.18 There was a reported decrease in understanding of the deadline from 29%¹¹ pre-launch to 23%¹⁰ in May 2018. The question asked in our national tracking survey seeks to identify to what extent consumers understand what they need to do before the

¹⁰ A statistically significant increase versus the pre-campaign level (August 2017) tested at a 95% confidence interval.

¹¹ Base = 447-580 respondents, all those that are aware of a PPI deadline.



deadline – which is to say that they need not only to have checked if they had PPI but also to have made a complaint, should they wish to do so. Currently, 32%¹⁰ of those who are aware of the deadline believe they need to check ahead of the deadline. This has increased burst on burst in line with our advertising focus on checking. There has been a correlating decrease in the number who think they need to complain pre-deadline.

- 3.19** We are confident that our year 2 focus on how to complain, and the message that consumers need to leave time to both check and complain before the deadline, will boost overall consumer understanding of the deadline.
- 3.20** We have applied insights from our tracking study to the development of campaign messaging and our subsequent creative approach. For example, in identifying that some consumers don't think the issue of PPI or the campaign is relevant to them, we developed creative content that seeks to improve perceived relevancy. An example of this is the delivery of new advertising creative that seeks to prompt recollection of a time when consumers may have purchased a credit product that PPI was often sold with.
- 3.21** Further, we learned that a good portion of our audience intend to take action on PPI only in the future, and we understand the challenge of natural short termism. To address this, we have developed creative that seeks to apply behaviour change theory, and in our latest burst have employed social norming tactics.

Communicating the issues of mis-selling and high commission earned by a provider but not disclosed (Plevin)

- 3.22** Our communications also aim to increase understanding of mis-selling and to provide helpful information relating to the issue of undisclosed high commission. We decided that due to the more complex and nuanced messaging required by these issues, we would deliver it through communication channels that provide more space and scope than traditional advertising channels. These include but are not limited to:
- website content
 - contact centre customer service
 - social media based customer service
 - press coverage
 - paid search signposting to relevant pages of our website
 - consumer leaflets
 - Q&As distributed for use by partner organisations
- 3.23** Whilst we track understanding of these through our national tracking survey, we also monitor alternative measures, such as visits to relevant web pages and number of calls asking questions relevant to mis-selling and Plevin. We also monitor levels of interest and engagement in both subjects through paid search (ie Google AdWords).

3.24 Results to date:

- **Understanding of mis-selling:** Our tracking survey indicates that the number of people who understand mis-selling has increased by 7 percentage points since launch. The corresponding web page has had 272,808 pageviews. In addition, for 75% of Google searches, we appear first in the search results, providing users with reassurance that we can be found instantly at the point of need. Our contact centre has only received 94 enquires specifically about mis-selling but we expect the demand for this information to increase as we include the term 'mis-sold PPI' in upcoming advertising.
- **Understanding of high commission earned by a provider but not disclosed:** Our tracking survey shows that the number of people who understand commission earned by providers but not disclosed has increased by 7 percentage points since launch. Our Plevin webpage has had 81,543 pageviews and 91% of those who provided feedback found the information helpful. Using paid search advertising, we are serving those who are searching for information on Plevin with a link to our webpage. For 97% of searches we appear first in the search results, providing users with reassurance that we can be found quickly at the point of need. Our contact centre experienced temporary spikes in Plevin specific enquires when the topic was raised in the public domain and when PPI providers sent letters to Plevin-eligible customers. In total, the Contact Centre has received 1,230 calls about Plevin.

Reaching and engaging vulnerable consumers through the communications campaign

3.25 A core part of the development and ongoing delivery of the campaign is to reach and engage vulnerable consumers. In doing so, we have considered (and continue to consider) the needs of vulnerable consumers across all our communications, including:

- advertising creative
- leaflets and posters
- website
- media buying
- press coverage/PR
- social media

3.26 Further information can be found in our Equality Impact Assessment update in Annex 1.



- 3.27** A key element of this work has involved our 23 third sector partners, who we would like to thank for their continued support in sharing our campaign messages.

Third sector partners who continue to support the campaign	
British Institute of Learning Disabilities	Advice UK
British Deaf Association	Christians Against Poverty
British Dyslexia Association	Consumer Council NI
Learning Disability England	Gingerbread
MIND	Macmillan
Rethink	Money Advice Trust
Scope	National Association for Voluntary & Community Action
Visionary	Shelter
RNIB	Chinese Information and Advisory Centre
Age UK	Confederation of Indian Organisations
Carers Trust	Race on the Agenda
Action with Communities in Rural England	

Plans for year 2

- 3.28** We are committed to the evidence-based continuous improvement of our campaign approach over the course of this second and final year. We have refined our approach across year 1, based on insights from our tracking survey and analytics from our media channels, website and contact centre. We will continue to evolve our campaign to focus in year 2 on:

- Improving on our KPIs, paying particular attention to strengthening consumers' understanding of what to do before deadline and how to complain.
- Optimising our website and consumers' journey online.

- Reaching vulnerable consumers and those with protected characteristics, offering communications and content relevant and appropriate to their needs. In particular, we will do more to reach and engage:
 - Black and Minority Ethnic (BAME) consumers, whose awareness of the deadline was 37% pre campaign and is now 47%, and
 - consumers with low financial confidence or capability, whose awareness is at 55%

More information on this is available in Annex 1.

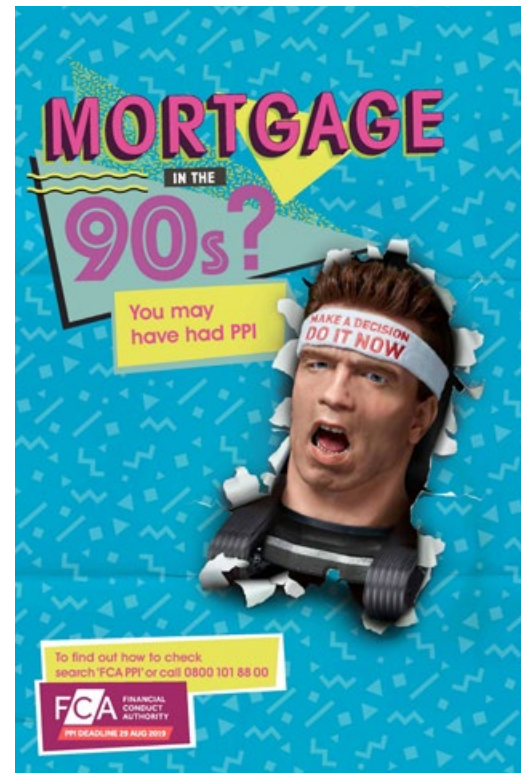
Campaign assets

A selection of assets from year 1 of the campaign, including adapted communications

Advertising burst 1



Advertising burst 2



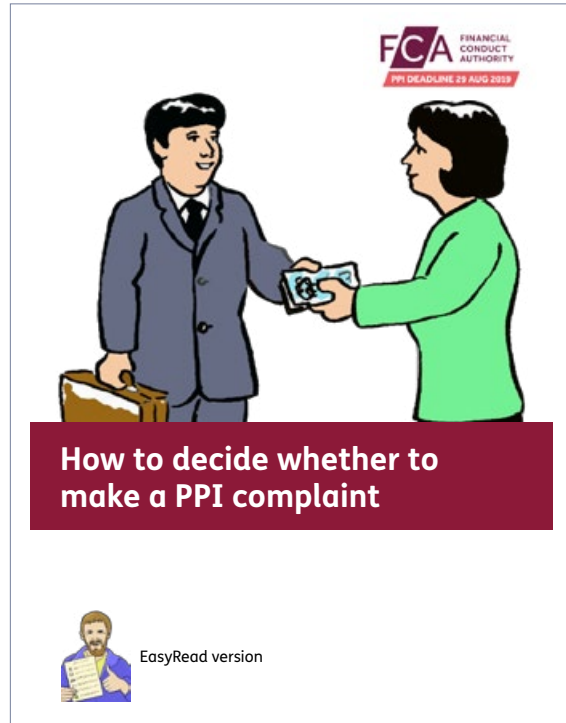
Advertising burst 3



PPI leaflet – Urdu translation



How to decide guide – Easy Read version



30 second TV advert – British Sign Language version with subtitles



PR – Rachel Riley encourages you to put checking for PPI on your to-do list

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MY WEEKEND

Rachel Riley

Mathematician and television presenter Rachel Riley is the maths expert on Channel 4's popular afternoon show *Countdown*, as well as appearing on *8 Out Of 10 Cats Does Countdown*. She has previously hosted Channel 5's *The Gadget Show* and it's *Not Rocket Science* on ITV, and in 2013 competed on BBC1's *Strictly Come Dancing*, partnered with Pasha Kovalev, who she is now dating. Rachel, 32, lives in London.

"I don't often enjoy 'regular' weekends, as I tend to work part of it. But if I'm at home, I aim to have a good lie-in on a Saturday morning. I'm a real night owl.

"When I do get up, I have breakfast, and watch a bit of telly before tackling my to-do list – top of which will be an hour of learning Russian. Pasha's mother doesn't speak any English and, as we are planning to take her and my parents away for a cruise to Croatia in the summer, I am very motivated. I also tend to deal with any money-related to-dos at the weekend.

"If there is a football match on, I will watch it. Last week, I went to Wembley to watch the FA Cup final!

"If I'm meeting my girlfriends for lunch, I'll cycle over to east London on my Pinarollo bike. I love going to Hyde Park, especially the Italian Water Gardens, and Paddington Basin is quite close to me, too. In the evening I'll go out for cocktails with friends.

"On Sundays, I'm often filming. I've been doing a lot of quiz shows recently and also filmed *The Chase* for a Soccer Aid special.

"For chill out time, I love settling down with a box set such as *Peaky Blinders* or *Game of Thrones*.

"Then I'll think about dinner. Pasha and I have gone vegan, so we will rustle up something tasty."

Roz Lewis
Rachel is supporting the FCA's PPI campaign, encouraging the public to put checking for mis-sold PPI on their to-do list ahead of the August 2019 deadline. Visit fca.org.uk/ppi.

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PR – Mr Motivator asks what's on your to-do list



4 Our supervisory work

- 4.1** Before the campaign began and since, we have monitored and challenged firms to ensure that they are helpful and accessible to consumers who have decided to act, and dealing fairly and consistently with the PPI checking enquiries and complaints they receive.

Before the campaign

- 4.2** We focused on ensuring that firms made it as easy and accessible as possible for consumers to act, and were ready operationally to respond promptly and fairly to consumer actions.

Information and assistance

- 4.3** At our request, firms:
- made appropriate amendments to their websites, for example to ensure that information about all the methods available to contact a firm about PPI, and their opening hours, were clear and easy to find
 - made relevant PPI information available in branches
 - established helplines to assist PPI consumers, with suitably extended opening hours
- 4.4** Firms also committed to:
- provide information aimed at supporting relevant vulnerable consumers and protected groups, including, for example, a commitment statement on meeting their needs
 - ensure that PPI web pages and online checking and complaint forms were set out clearly and were accessible to users of assistive technology
 - ensure the provision of reasonable adjustments to formats to meet the information needs of relevant vulnerable consumers and protected groups
 - monitor consumer demand for translation and whether this suggested a need to offer functionality to view the PPI web pages in languages other than English

Easy and accessible enquiry process

- 4.5** The process for submitting a check for PPI through a CMC was already well-established, but we asked firms to ensure they made the checking process as easy and accessible as possible for individual consumers, by:
- reducing to a minimum the information asked for when consumers submit a checking enquiry (for example, not insisting on the enquirer providing an account number)



- providing consumers with the option of submitting PPI checking enquiries electronically via an online form or third-party tool
- conducting checks concerning a PPI enquiry that were at least equivalent in scope of search and speed to what would be done (in respect of PPI) for a data subject access request (DSAR) under data protection laws

Easy and accessible complaints process

4.6 The PPI complaint process was also well-established, especially for mis-selling complaints. However, before the launch of the campaign we asked firms to make this process even easier for individual consumers, by:

- providing consumers with the option of submitting PPI complaints electronically via an online form or third-party tool (where they did not provide this already)
- reducing to a minimum any documentation or information required before a consumer's expression of dissatisfaction was logged by the firm as a complaint
- reducing to a minimum the evidence and information asked of the complainant as part of the assessment of the logged complaint, including by streamlining forms and ensuring only key sections are mandatory

Firms' operational readiness

4.7 We checked in detail firms' readiness to handle consumers' actions in response to the campaign by requesting and assessing information about their operational plans for the campaign period, including their contingency plans if volumes turned out to be higher than they had expected. We challenged firms where we felt they needed to make more robust preparations and strengthen operational resilience.

Firms' readiness to assess Plevin complaints

4.8 In the months before our rules and guidance came into force, we assessed in detail the figures for commission and profit share that firms were proposing to use when assessing Plevin complaints. We also assessed the assumptions or averages that some proposed to use in respect of certain periods where they lacked full financial records.

4.9 We challenged firms to adjust and enhance certain aspects of their proposed approaches to ensure these would give fair and consistent outcomes. Overall, we satisfied ourselves that firms' approaches were reasonable and evidenced.

Since campaign launch

4.10 Since the launch of the campaign we have:

- Closely supervised firms to ensure their improvements and readiness have been delivered and maintained.
- Asked firms to make some further improvements to their websites, such as carrying fuller information about all their relevant brands, including historic ones no longer in use, to assist consumers' decision making.

- Held regular operational calls with firms to discuss the volumes of checking enquiries and complaints they have received, and their handling times.
- Monitored and challenged (as appropriate) the fairness and consistency of the outcomes firms are delivering to consumers who checked for PPI and/or complained.

4.11 We have also pursued four main supervisory priorities, as described below. (See Annex 4 for details of how we did this work).

Checking enquiry outcomes

4.12 We have conducted detailed reviews of firms' systems and controls for handling and answering checking enquiries. Our work in this area is not yet complete. However, in response to our challenge and feedback so far, firms are making further improvements, to drive greater consistency and accuracy of outcomes, both within individual firms (across their different brands and submission channels) and across firms. This includes:

- enhancing their 'you had PPI' responses to include messaging about the 29 August 2019 deadline and how to complain (where they did not include this already)
- making it easier for consumers to ask for all brands or PPI-types to be included in a single checking enquiry (where this was not easy already)
- amending (broadening) their search parameters to ensure that consumers whose enquiries refer to specific brands or PPI product types are not potentially disadvantaged, relative to those who make entirely general enquiries
- being clearer with consumers regarding what information is mandatory for a check to be carried out, and what is not
- being clearer with consumers to whom they are giving 'No PPI' answers about what records have or have not been checked to reach that answer, and about what additional kinds of information the consumer would need to provide to facilitate a renewed search and potentially different answer
- monitoring cases where an initial 'No PPI' response to a check is subsequently challenged and, on further investigation, overturned, so as to identify root causes and learn lessons and thereby continue to improve their checking processes
- ensuring that secondary borrowers on joint loan accounts are included in the search

4.13 Overall, our assurance work indicates that firms have well-considered and well-resourced checking processes that are mainly delivering accurate answers.

4.14 But we have also identified that some firms have had some process shortcomings which may have led to some previous checking enquiries having been answered incorrectly in respect of certain brands at certain periods. This work is in progress, but we will expect these firms to correct these shortcomings going forward and identify where remediation of past responses is needed.



Firms' Plevin mailing

4.15 We have reviewed in detail firms' approaches to identifying which previously rejected mis-selling complainants fell within the scope of the required Plevin mailing, and to executing it. On the basis of this review, we are satisfied that firms have for the most part:

- identified and included the right consumers in their mailings
- completed their mailings on time
- sent their letters to the right current addresses¹²

4.16 Some firms have made small additional mailings following our review and feedback, including, for example, to those cases where:

- the previous complainant was now deceased
- the mis-selling complaint was rejected previously as being out of time
- the previous mis-selling complaint was withdrawn by the consumer for a reason that would not be relevant to their making a new complaint in light of Plevin¹³

4.17 The overall response rate to the mailing has been around 40%.¹⁴ As for the campaign generally, we regard an informed decision by the consumer not to complain as a valid outcome. Nonetheless, from the perspective of behavioural findings concerning the effect of previous FSA/FCA consumer contact exercises, the Plevin mailing's response rate is not out of line, relative to the average redress given by those other exercises, or the financial sophistication of the consumers involved in them.

Firms' complaint handling

4.18 We closely monitor the PPI complaints data provided each month by firms. In particular, we expanded the reporting return before the start of the campaign to ensure that it would provide detail concerning Plevin complaint outcomes.

4.19 We also gather and assess intelligence from stakeholders, including individual consumers (mainly via our helpline), CMCs and other consumer representatives and bodies.

4.20 Overall, our assurance work indicates that firms have mature and well-resourced complaints handling processes that are mainly delivering accurate assessments and decisions.

4.21 However, on the basis of intelligence received, we have secured further improvements in certain niche aspects of some firms' complaint handling operations, including, for example:

12 On average, around 1% of letters were returned as mis-directed. Firms generally looked into these cases again, to make further efforts to identify a correct address to re-send to.

13 For example, the consumer had withdrawn their original mis-selling complaint because they had not wished to lose the PPI cover, as would have been the case if they had continued with their complaint and been upheld as mis-sold, whereas redress paid in light of Plevin does not involve the cancellation of the policy.

14 This could still rise if some recipients are prompted by our further campaign bursts to return to the letters and respond to them before the deadline.

- a firm amending its approach, so as to reduce the level of identity verification it required before logging a consumer's complaint
- a firm changing its approach to ensure adequate redress to both parties to a policy, even where one party had already previously complained and been redressed
- several firms improving their communications with CMCs concerning complaints
- several firms undertaking redress exercises for specific cohorts of previous complaint cases and decisions where issues have since been identified

4.22 These issues are of limited scope, and do not alter our view that, overall, firms are dealing with PPI complaints fairly and consistently. We will continue to assess and intervene appropriately in respect of any further issues that we receive intelligence about.

Vulnerable consumers

After the campaign began, we:

- engaged with consumer organisations¹⁵ that we considered likely to receive large volumes of PPI related enquiries from protected groups and vulnerable consumers, to gather information from them about any issues these consumers had experienced
- surveyed consumers who had contacted our PPI helpline and been identified as needing additional support, to ask if they had received the support they needed from us and from their PPI providers, and assess whether there were signs of issues within firms
- asked the Ombudsman Service about consumers it had identified as being in need of additional support, to gain insight into whether those consumers had received appropriate support from the PPI firms they had complained about
- sourced further input from diversity and inclusion consultants Goss Consultancy Limited (GCL), who had supported us with our Equality Impact Assessment (EIA), to look through their specialist lens into vulnerability and accessibility issues

4.23 From the perspectives gained, we identified that certain consumers would potentially benefit from further support from firms when making a checking enquiry or complaint. We then:

- Reviewed the accessibility pages and PPI content of firms' websites, to understand what features and services were available. This involved conducting technical testing of the compatibility of PPI pages with assistive technology, and gaining feedback from mystery shoppers with accessibility needs.
- Reviewed the measures firms are taking to ensure that these consumers:
 - do not experience obstacles or unfair outcomes when they wish to make a checking enquiry or complaint
 - receive reasonable help and adjustment

15 Age UK, Money Advice Trust, Money Advice Scotland, Christians Against Poverty, StepChange Debt Charity.



- Challenged firms to demonstrate:
 - what policies and procedures they had in place for identifying and assisting relevant complainants
 - how the communication needs of certain protected groups and vulnerable consumers were recorded and responded to during the complaints process
- Assessed whether firms had identified the key early touchpoints in their internal processes for handling PPI checks and complaints, and had adequate procedures in place to ensure staff respond to the consumer's communication needs appropriately.
- Sourced and assessed firms' data on the number of vulnerable consumers identified as passing through the processes since the launch of the campaign, and on whether they completed their journeys and the outcomes they obtained.

4.24 Overall, we have found:

- that most firms provide reasonable levels of support for consumers with visual or hearing impairments
- no indication that those consumers whom firms had identified as vulnerable had been disadvantaged in their complaint outcomes compared to complainants in general

4.25 However, we have provided firms with specific feedback on areas where we felt there was still room for improvement. We have asked firms to implement further changes to their websites to ensure that they:

- make clear whether the website adheres to recognised web accessibility standards
- carry information on the available features supporting accessibility and compatibility with assistive technology
- highlight the availability of telephony support when making a checking enquiry or a complaint
- provide information on the range of methods available to contact the firm, including the support and accessibility available in branch networks

4.26 We have also asked firms to consider implementing other changes, including:

- enhancing training materials and guidance to better support case handlers
- incorporating proactive enquiries about the need for additional support into call scripts and online forms, to improve identification of vulnerable consumers
- improving the systems in place for recording and tracking customer support needs

- improving quality assurance of identified vulnerable consumers' checking and complaint journeys
- improving the monitoring of outcomes for vulnerable consumers

Next steps

4.27 In the remaining time before the deadline, our supervisory work will focus on ensuring that firms:

- maintain and further improve their accessibility and handling
- correct any areas where shortcomings are identified
- prepare to deal fairly and effectively with complaints in the final run-up to the deadline



5 Consumers' actions and outcomes

Consumers' actions

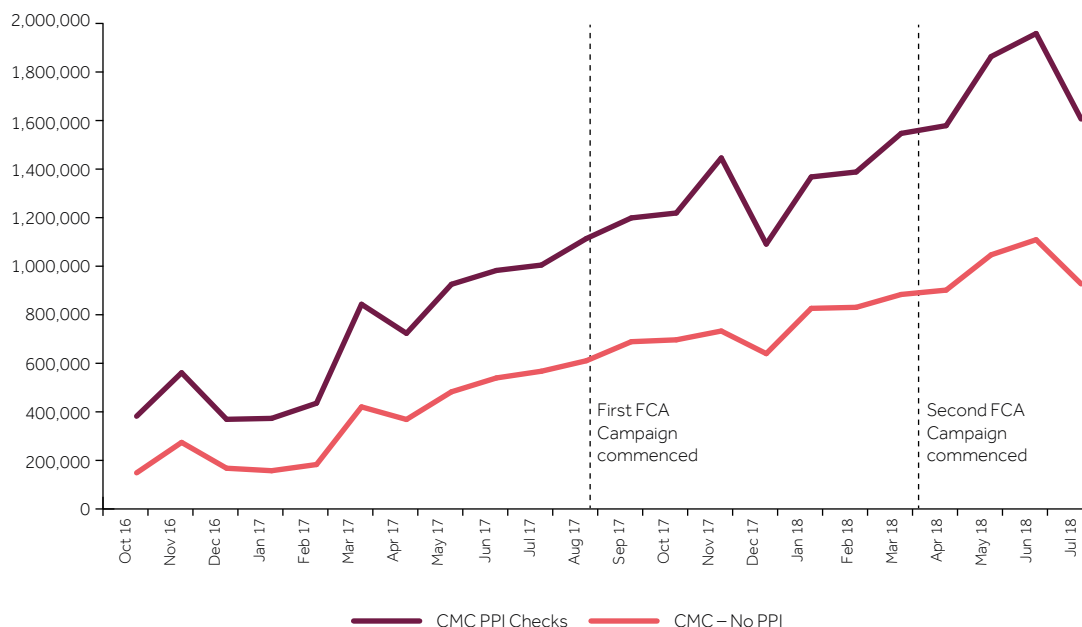
5.1 The combination of our communications campaign prompting consumers to make a decision about whether to act, and our supervisory work with firms making it easier for consumers to act, appears to have led to increased consumer action. This is evidenced by:

a. The significant increase in checking enquiries since the start of our campaign

5.2 In the 10 months since the campaign's launch, 8.4m checking enquiries were made, with monthly volumes 40% up on the immediate pre-campaign level. Most checking enquiries continue to be made through CMCs.

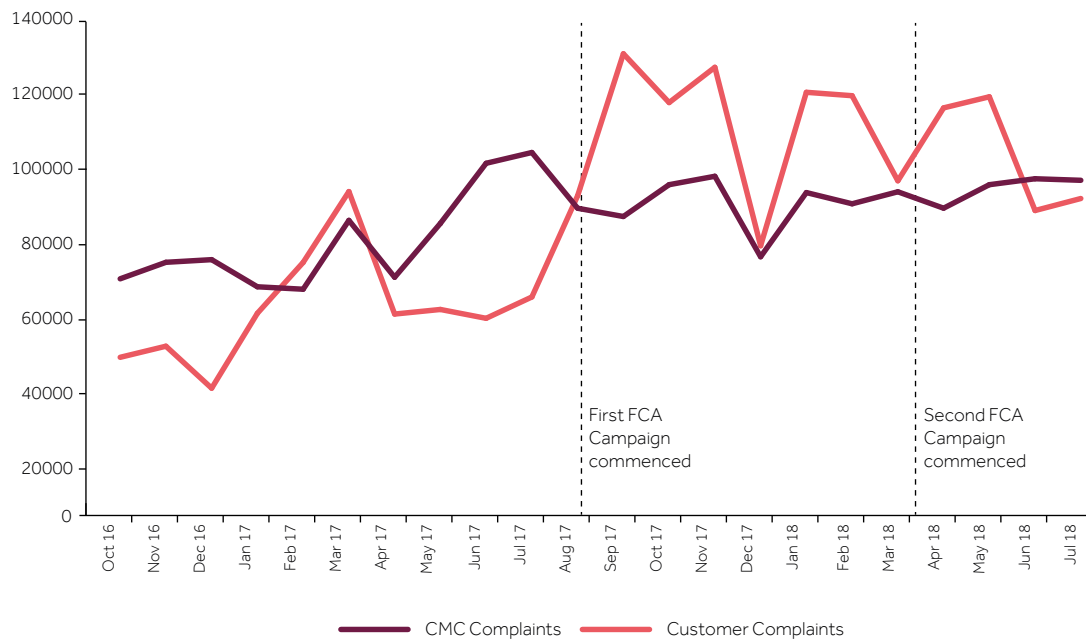
5.3 Despite this significant increase in the volume of enquiries, firms' checks continue to find that the consumer did have PPI in around 40% of cases (regardless of whether the enquiry came through a CMC or direct from a consumer).

PPI Checking enquiries



b. The significant increase in complaints since the start of our campaign, and increased proportion being made directly by consumers

PPI Complaints



5.4 The increase in prior checking enquiries seems to have contributed to a fall in the proportion of complaints submitted but rejected by firms as 'No PPI'. This is more efficient, saving consumers from making fruitless complaints, and freeing up firms' resource for assessing the merits of cases where the complainant did have PPI.

5.5 Despite the significant increase in checking enquiries and complaints, firms' robust operational planning and capacity building has ensured that they have:

- maintained timely handling of checking enquiries, giving responses to most enquiries far quicker than the 40 days required of DSARs
- sent final responses within 8 weeks to 9 out of 10 complaints received since the start of the campaign

Consumers' complaint outcomes

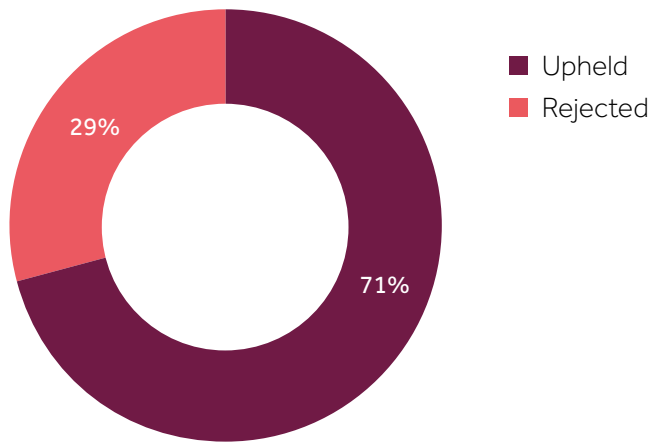
5.6 Firms have given final responses to 3m complaints in the 10 months since the campaign began. Of these:

- 71% of cases assessed for mis-selling ('Step 1') were upheld as mis-sold (broadly maintaining the average uphold rate since 2014)¹⁶

¹⁶ <https://www.fca.org.uk/publication/thematic-reviews/tr14-14.pdf>

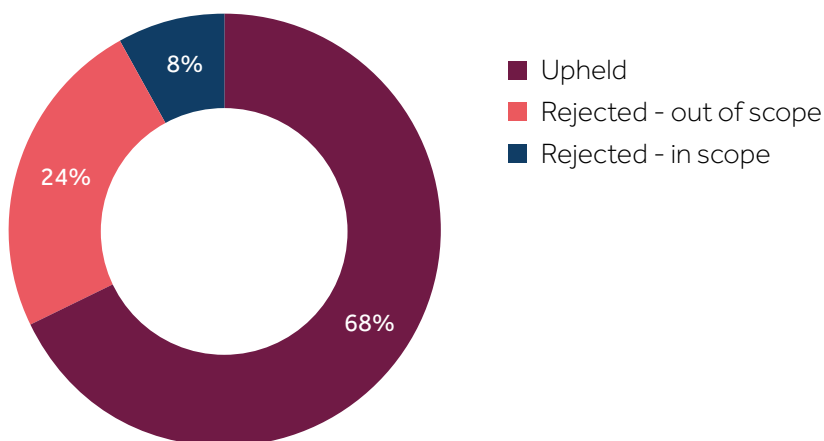


PPI Mis-selling Complaints Uphold Rate



- and of cases assessed in light of Plevin ('Step 2')¹⁷:
 - 68% were upheld and redressed as involving an unfair credit relationship under s140A Consumer Credit Act (CCA)
 - 24% were rejected as lying outside the scope of s140A CCA
 - 8% were rejected as lying within s140A CCA but not involving an unfair credit relationship

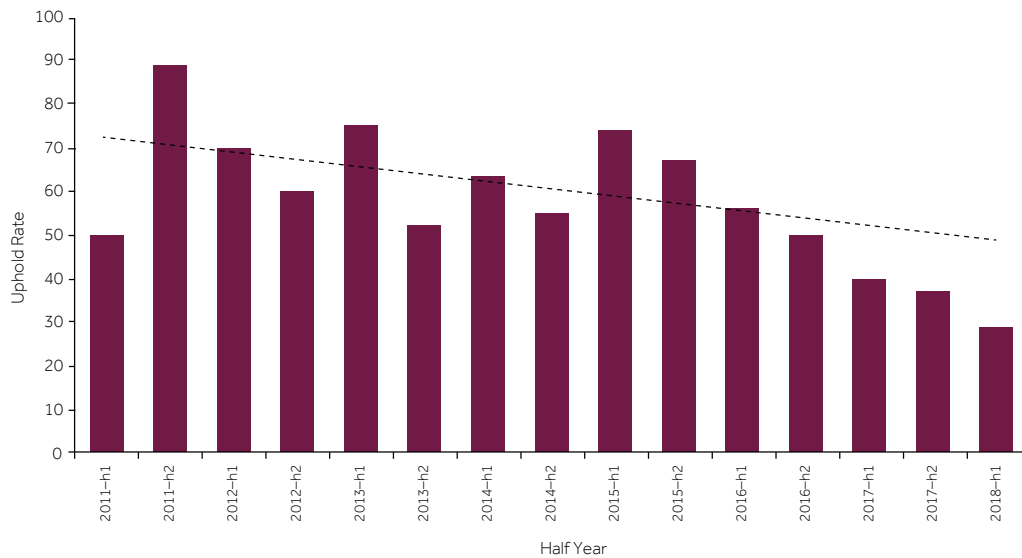
Plevin Complaints Uphold Rate



¹⁷ This will include all cases rejected at Step 1 as not mis-sold, but also cases where the consumer made clear they were complaining only in light of Plevin (which will include complaints made in response to firms' Plevin mailings).

- 5.7** These Plevin decisions include over 500,000 that relate to complaints made during 2015-2017 that were assessed as not mis-sold but put on hold for potential Plevin assessment, because they fell within s140A CCA, pending the conclusion of our policy process (which turned out to be 29 August 2017). Now those have been dealt with, it is likely that, going forward, a greater proportion of new cases will fall outside s140A CCA and so be rejected at Step 2.
- 5.8** If we finalise in due course the guidance we are consulting on concerning the assessment of certain regular premium PPI complaints, we anticipate that it will lead to a somewhat higher proportion of those complaints that do lie within s140A CCA being upheld at Step 2.
- 5.9** The outcomes of cases at the Ombudsman Service cannot be straightforwardly related to firms' complaint handling¹⁸, and generally lag firms' current practices. But the Ombudsman Service is now overturning or amending firms' decisions in far fewer cases than previously, and at a level that is in line with the average for complaints about other products.

Ombudsman Service PPI Decisions



- 5.10** This suggests improved complaint handling by firms, in particular improved engagement with the Ombudsman Service and learnings from its decisions. This view is confirmed by our regular discussions with the Ombudsman Service.
- 5.11** The average redress for complaints upheld in 2018 is:

- £2,001 for those upheld as mis-sold
- £1,191 for those upheld in light of Plevin

18 For the reasons why, see Annex 5 in <https://www.fca.org.uk/publication/consultation/cp15-39.pdf>



- 5.12** This difference reflects the different bases for redress in the two types of cases.
- 5.13** Redress paid during the first 10 months of the campaign is £3.7bn, which is 64% up on the same period before the campaign.

Annex 1

Update on our equality impact assessment

Background

We are required under s.149 of the Equality Act 2010 to have due regard in the exercise of our functions to the need to:

- eliminate discrimination, harassment, victimisation and other conduct prohibited by the Act
- advance equality of opportunity between people who share a relevant protected characteristic and those who do not
- foster good relations between people who share a relevant protected characteristic and those who do not

The relevant protected characteristics which we are required to consider are:

- age
- disability
- gender reassignment
- pregnancy and maternity
- race/ethnicity
- religion or belief
- sex
- sexual orientation
- marriage or civil partnership status¹⁹

We also consider that our consumer protection objective requires us to consider the position of vulnerable consumers when discharging our general functions²⁰.

19 In relation to the elimination of discrimination, harassment, victimisation and other prohibited conduct, but not the advancement of equality of opportunity, or fostering of good relations.

20 Section 1B Financial Services and Markets Act 2000 (FSMA). Our general functions include the making of rules and giving general guidance: s1B(5) FSMA.



We refer to the Equality Impact Assessment (EIA) set out in Annex 2 to PS 17/3. At that time, we had not found any evidence of harassment, victimisation or anything relevant to the fostering of good relations. But we did identify that our measures had the potential to result in less favourable outcomes for some protected groups and vulnerable consumers.

Specifically, we identified that there are particular reasons why belonging to certain protected or vulnerable groups may make some consumers less able to understand or less willing to act upon our communications campaign. This means there is a greater chance of such consumers not having considered whether they would like to complain about their PPI policy and consequently not making a complaint before the deadline.

The particular groups our research showed may be disadvantaged are:

- older people (particularly those aged over 65 and even more so for those over 75)
- women
- black and minority ethnic (BAME) groups (particularly those for whom English is not their first language)
- disabled consumers, with mental health problems, learning disabilities, cognitive and/or sensory impairments
- vulnerable consumers on low incomes with low financial confidence

Given the evidence on age and cognitive impairment, we also identified a need to ensure that the campaign engages people who care for older or disabled people.

We also considered the potential impact on those in, or discharged from, bankruptcy or other forms of debt relief arrangements, including Individual Voluntary Agreements (IVAs) and Debt Relief Orders (DROs).

As a result of this analysis, and where we identified there could be an adverse impact, we developed mitigating actions that would eliminate these potential disadvantages, or minimize them to a level that is reasonable and justifiable, given we did not think we could reasonably and proportionately achieve our overall aim of an orderly conclusion to the PPI issue by other means.

Below, we update on the mitigating actions we have taken in the context of our campaign.

Older People

In our EIA, we identified evidence that those aged 65 or over could be adversely impacted because of lower financial capability, knowledge and confidence, and lower levels of usage of the internet, particularly as a significant amount of information about PPI is internet-based. The issues become more significant for those aged over 75, as financial skills and proficiency can decrease, which can make complaining more difficult. There are 11.6 million people aged 65 or over in the UK and 5.5 million aged 75 and over.

We also identified cold calling as an issue. Any increase in cold calling as a result of the deadline could have a more significant impact on older people, who are more likely to have land lines and be at home during the day.

We have taken the following steps:

- tested our advertising concepts with groups aged over 65 and over 75, including direct testing through focus groups and individual depth interviews with advocates who support consumers in these age groups. This research provided evidence that the selected concept would resonate with older people.
- advertised a Freephone helpline number on appropriate channels (i.e. TV, posters, radio), to ensure older audiences who are less likely to use the internet have a clear route for contacting us to obtain further information about PPI. Since launch, 22%²¹ of callers to the helpline have been over 65 years old.
- booked media plans that have delivered 97% coverage of audiences over 65 and over 75, reaching this audience a total of 34 times²² across all media used.
- worked with campaign partner, Age UK, who has shared our message through its owned channels and provided consumers with adapted communications (large font formats) if required.
- secured editorial coverage about PPI with a broad range of non-commercial television and radio stations to increase awareness of the deadline, including the BBC, and RNIB Connect Radio, which is an example of a channel used by those aged over 65.
- tested the PPI website content directly with older people and/or with partners supporting older people, to ensure that it was easy to understand for consumers in these age brackets who do use the internet.

We also designed our consumer tracking research to include a robust sample of older people.

Our tracking research confirms that campaign recognition for older people is in line with the national average (72% v 73% average): this is mainly due to higher levels of TV recognition (67% v 63% average). Our research also confirms that older people have on par awareness of the deadline (62% v 68% average) and understanding (78% v 82% average).

As a result, we are confident, on the evidence currently available, that the steps we have taken and are taking to minimize or eliminate potential detriment to the consumers in this age group are working, as they have been reached and engaged by the campaign equally as well as younger consumers.

21 Base: 33,450 contacts, Aug 2017 – Aug 2018.

22 Represents aggregate of Burst 1 and Burst 2 advertising



Discussions with the Information Commissioner's Office since campaign launch have given no evidence of increased cold calling to the elderly (or others). We note that the Ministry of Justice has proposed a cold calling ban (though this may not come into force before the PPI deadline).

Women

In our EIA, we noted that women in the UK appear less likely than men to complain about financial services, due to slightly lower average financial knowledge and familiarity.

While our view was that the large-scale communications campaign would be effective at reaching women, we took further actions in order to either eliminate any disadvantages, or minimise them to a level that is reasonable and justifiable.

We have taken the following steps:

- tested advertising concepts with women, drawing out particular feedback from women in different age groups, i.e. those over 65 and 75 as identified above. This research provided evidence that the selected concept would resonate with women.
- booked media plans that have delivered 97% coverage of female audiences, reaching this audience a total of 25 times²³ across all media used.

We also designed our consumer tracking research to include sufficient coverage of women.

Our tracking research confirms that campaign recognition for women is in line with the national average (72% v 73% average) and that of men. There is no pattern of difference between men and women with regard to our campaign objectives of awareness (69% v 68% average) and understanding (81% v 82% average).

As a result, we are confident, on the evidence currently available, that the steps we have taken and are taking to minimize or eliminate potential detriment to the consumers in this group are working, as they have been reached and engaged by the campaign equally as well as men.

BAME groups

In our EIA, we noted that evidence showed that many members of BAME groups, including those for whom English is a second language, have lower levels of financial knowledge, which could impact their decision-making on PPI.

We have taken a number of specific steps with BAME consumers in mind, to ensure any disadvantages are either eliminated or minimised to a level that is reasonable and justifiable.

²³ Base = c. 850 respondents. This is the base for all metrics in Annex 1 unless otherwise stated. Details of our tracking research programme can be found in Annex 2.

We have taken the following steps:

- we continue to work with an independent communications expert, Multicultural Marketing Consultancy (MMC), that has experience of reaching and engaging diverse BAME audiences. MMC advises us on the planning and production of the campaign.
- we tested creative concepts with a range of BAME audiences, including direct testing with consumers and interviews with advocates of BAME communities. This research provided evidence that the selected concept would resonate with BAME audiences.
- booked media plans that have delivered 97% coverage of BAME audiences, reaching this audience a total of 37 times²⁴ across all media used.
- secured editorial coverage about PPI with key earned media channels consumed by BAME audiences, such as Asian Express and Panda Radio, and mainstream titles which we know are consumed by a diverse range of audiences including BAME groups.
- worked with the Chinese Information and Advisory Centre, the Confederation of Indian Organisations and Race on the Agenda. We will continue to identify new partnership opportunities to reach BAME audiences.
- produced digital adverts and a campaign leaflet in seven different languages spoken by BAME communities, as recommended by MMC.
- produced information-based animations housed on our website in five²⁵ different languages as recommended by MMC.
- translated our website into seven different languages as recommended by MMC.
- provided a translation service to callers requiring information in another language.

We also designed our consumer tracking research to include sufficient coverage of BAME communities.

Our tracking research indicates that among BAME audiences:

- campaign recognition is significantly below the national average (49% v 73% average following burst two)
- awareness of the deadline has increased from 37% pre-campaign to 47%, but is below the 68% national average
- understanding has increased from 55% pre-campaign to 60%, but is below the 82% national average

24 Represents an aggregate of Burst 1 and 2 advertising.

25 Based on guidance from MMC, who advised that audio visual translation requirements differ from those for visual only (e.g. website).



We will continue to take the necessary further steps to ensure that we reach and engage these groups. In particular, we will increase investment in media channels consumed by BAME groups, as well as further targeting areas of high BAME population with outdoor advertising. We will also develop and expand our below the line communications programme to further target BAME communities.

Overall, we consider, and MMC agrees, that the actions we have taken are mitigating disadvantages to BAME audiences. However, further work is needed to minimise these promptly to a level that is reasonable and justifiable.

Disability

In our EIA, we noted that while many people with disabilities effectively manage their day to day affairs, evidence also showed that many appear to have lower levels of financial confidence, lower awareness of financial matters, less engagement with financial issues and a lower propensity to complain.

We have taken a number of specific steps to ensure any disadvantages are either eliminated or minimised to a level that is reasonable and justifiable.

We have taken the following steps:

- worked alongside an independent communications expert, BDS Communications Limited, with experience of reaching and engaging these audiences, to advise on planning and producing the campaign.
- tested four creative concepts directly with consumers and with advocates that support the groups identified above in respect of cognitive impairments, learning disabilities, mental health and sensory impairments.
- obtained feedback from advocates about adapted communications and effective media, which we have taken forward when designing campaign materials.
- ensured, and will continue to ensure, that all our communication is inclusive in terms of language, formats and imagery, and meets appropriate accessibility standards.
- booked media plans that have delivered 98% coverage of disabled audiences, reaching this audience a total of 23 times²⁶ across all media used.
- worked with organisations that support people with disabilities including: British Deaf Association, British Dyslexia Association, British Institute of Learning Disabilities, Learning Disability England, Mind, Scope, Rethink and Visionary. These organisations have shared our message through their owned channels and provided consumers with adapted communications (audio, braille, large print, easy read, British Sign Language (BSL) and accessible PDF formats).
- produced adapted versions of our campaign leaflet and three explainer videos, as well as BSL versions of our TV adverts.
- provided specific training on accessibility to our helpline staff who give information about PPI. This includes not speaking too quickly, being prepared to repeat or

26 Represents an aggregate of Burst 1 advertising only.

rephrase, giving the caller time to explain fully, not assuming the caller can see and read, and providing information to the consumer via the text relay service.

- tested our website through an independent agency with users who have a range of visual, hearing and cognitive impairments. The FCA website is developed and tested in order to meet Web Content Accessibility Guidelines (WCAG²⁷) AA standards of accessibility. The accessibility of the FCA website is evaluated independently every year on an annual basis to WCAG standards (industry best practice standards). The PPI specific website content was tested to the same standards and with a range of users ahead of campaign launch.

We have also designed our consumer tracking research to include coverage of those who identify as having a disability.

According to our tracking research, campaign recognition is slightly above national average (77% v 73% average). Awareness of a deadline is just below (63% v 68% average). Understanding has increased across the course of the campaign but is lower than average, with 74% of people with disabilities understanding PPI, v 82% of our total audience.

We will take the necessary further steps to ensure that we reach and engage this group. In particular, we will explore delivery of a grass-roots programme of activity to target people with disabilities. This will consider channels to reach this audience, including through the network of care providers. As part of this, we will assess learnings from our grass-roots programme for the BAME cohort.

Overall, on the evidence currently available, we consider that the actions we have taken are significantly mitigating disadvantages to this audience. However, some further work is needed to minimise these promptly to a level that is reasonable and justifiable.

Lesbian, gay, bisexual, transgender (LGBT)

For LGBT consumers, we previously identified relatively limited evidence of potential disadvantages. However, we did highlight that an LGBT customer considering making a complaint may be more confident in doing so if certain improvements are made to the customer experience. For transgender consumers, we identified that a PPI deadline may create disadvantages connected to changing name because of the process of personal identification in the course of the PPI complaints process.

We have taken the following steps:

- Updated our training for helpline staff on non-specific gender and titles, with input from Stonewall.
- Got more information about how the PPI complaints process works for transgender people, to identify any specific logistical issues or barriers about verification of identity they may face. We found that proof of identity is required to prove a name change, but that is no different than for any other customer who changes their name, and is to be expected. We tested the process with two large firms and are confident that these firms have thought about the issue of name/gender changes

²⁷ Web Content Accessibility Guidelines (WCAG) are developed through the W3C process in cooperation with individuals and organisations around the world, with a goal of proving a single shared standard for web content accessibility that meets the needs of individuals, organisations, and governments internationally. The WCAG documents explain how to make web content more accessible to disabled people



and have reasonable procedures in place. On the basis of this information, we conclude that these customers are not at a disadvantage when compared to others.

We are confident, on the evidence currently available, that the steps we are taking to minimize or eliminate potential detriment are working in relation to LGBT consumers.

Other groups considered

Low income and low financial confidence

In our EIA, we identified that low income could be more likely to make someone vulnerable and impact their likelihood of complaining as a result of lower financial confidence. As such, our view is that there could be a potential adverse impact on this group.

We have taken the following steps:

- We tested the creative advertising concept with this group and took into account any feedback. This research provided evidence that the selected concept would resonate with people on low incomes and with low financial confidence.
- We are working with relevant partners: Action with Communities in Rural England (ACRE), Advice UK, Christians Against Poverty, Consumer Council NI, Gingerbread, Macmillan, Money Advice Trust, National Association for Voluntary & Community Action and Shelter. Partners communicate our message via their owned channels, including the distribution of campaign materials.
- Our media plans have delivered 97% coverage of low income and low financial confidence groups, reaching this audience a total of 11 times²⁸ across all media used.
- We have a partnership arrangement with the Citizen's Advice Bureau (CAB) to support vulnerable consumers. This includes the arrangement (if needed) of house visits to consumers' homes by CAB, as well as face to face meetings in local CAB offices, to help them complete forms, contact firms and assist the consumer with their PPI checking enquiry or complaint.
- We have the facility to 'warm' transfer consumers to their firms, and to support organisations such as the Ombudsman Service, Age UK, Samaritans and others.

We also designed our tracking research to ensure we can specifically track this group against the campaign objectives, in order to identify issues and make changes if necessary.

Our tracking research confirms that levels of campaign recognition are similar to the national average, at 70% v 73% average. Awareness and understanding are below national average: 55% are aware of the deadline v 68% average, and 73% understand PPI v 82% average.

We will take the necessary further steps to ensure that we reach and engage this group. In particular, we will explore delivery of a grass-roots programme of activity to target people with low financial confidence, as well as considering other channels to reach this audience. As part of this, we will assess learnings from our grass-roots programme for the BAME cohort.

²⁸ Represents an aggregate of Burst 2 advertising.

Overall we are confident, on the evidence currently available, that the steps we are taking to minimize or eliminate potential detriment are significantly mitigating any disadvantages in relation to consumers with low income and low financial confidence. However, as set out above, we will be taking further steps which we believe are likely to either eliminate or mitigate any remaining disadvantages to a level that is reasonable and justifiable.

We have also considered the position of those in or discharged from bankruptcy or other forms of personal insolvency, in particular, IVAs and DROs, and concluded that a PPI deadline is unlikely to cause any adverse impact on this group.²⁹ We have not put in place specific mitigating actions for this group, but our mitigating actions in relation to people on low incomes and with low financial confidence are relevant for reaching this audience through the communications campaign. We have also included information for those with personal insolvency issues on our website.

Carers

Given the evidence on age and disability, we believe it is important to reach and engage with carers. The evidence we obtained confirmed that carers consume media in the same way as mainstream audiences but are more likely to experience pressure on their time. We have ensured that the campaign is clear, understandable and presents the importance of making a decision whilst signposting our website and helpline to enable them to engage when convenient. We maintain that the mainstream campaign has been effective at reaching this audience.

We have also taken the following steps:

- We have tested the advertising campaign with a relevant advocate organisation and have evidence that the selected concept will resonate with carers.
- We have worked with Carers Trust to share our messages, and the specific information relevant to the caring community, through their owned channels. This mitigation reflects specific evidence we considered about the need to reach carers through a trusted partner.
- We are also exploring other ways to reach this audience, such as specific publications or networks, to provide information quickly and conveniently to carers.

We are confident, on the evidence currently available, that the steps we are taking to minimize or eliminate potential disadvantages are working in relation to carers.

Monitoring

We continue to monitor and track the impact of the deadline and campaign on the protected groups and vulnerable consumers identified as at greater risk of being disadvantaged.

29 We have assumed that individuals abide by the rules or requirements of their individual personal insolvency arrangement, which (while varying from case to case) would generally require the disclosure of a potential PPI complaint as a potential asset at the point an individual became aware of it. We have spoken with the Insolvency Service, who have confirmed that our understanding of the arrangements is correct.



We do this through a number of measures, including:

- consumer tracking research, which we have designed to include robust coverage of all the relevant audience groups
- Management Information from the FCA's PPI Helpline
- feedback from partner organisations
- firm data, including the number of vulnerable consumers supported

EIA overall conclusion

Our assessment indicates that the various mitigating actions taken so far, as well as those planned for year 2 of our campaign, have:

- Already eliminated the potential disadvantages for most groups, or minimised them to a level that is reasonable and justifiable, and
- Will do likewise for the remaining groups in good time before the deadline. To ensure this, we will continue to refine and improve the campaign and communications as necessary, and consider alternative communication options and initiatives.

Annex 2 Campaign tracking survey

We monitor campaign impact using a national tracking survey. The research uses a mixed methodology of monthly online surveys and quarterly face-to-face interviews.

The metrics cited within this report are taken from the pre-campaign wave conducted in August 2017 and post-burst 2 wave conducted in May 2018. Sample sizes are approximately 850 respondents per wave, with weights and quotas in place to accurately represent our audience (UK adults over 25 years old).

Our key performance indicators are measured using the questions below, with the answers we see as positive in bold.

KPI	Question
Deadline awareness (aware of 2019)	<p>As far as you know, is there a deadline to complain about payment protection insurance (PPI)?</p> <ol style="list-style-type: none"> 1. There definitely is a deadline 2. There might be a deadline 3. I don't know whether there is a deadline or not 4. I don't think there is a deadline 5. No, there is definitely no deadline <p>When is the payment protection insurance (PPI) complaints deadline? If you're not sure of the exact date, please enter an estimate. [xyz 2019]</p>
Understanding of how to check	<p>Which of these statements best describes your need to know more about how to check whether you have ever had any payment protection insurance (PPI) policies?</p> <ol style="list-style-type: none"> 1. I know enough about checking whether I have had PPI 2. I would like to know more about how to check whether I have had PPI 3. Don't know
Understanding of PPI	<p>Which of these statements best describes your need to know more about payment protection insurance (PPI)?</p> <ol style="list-style-type: none"> 1. I know enough about PPI 2. I would like to know more about PPI 3. Don't know
Understanding what action needs to be taken before the deadline	<p>If someone wanted to make a complaint about payment protection insurance (PPI) how far along the process would they need to be before the deadline?</p> <ol style="list-style-type: none"> 1. Checked if they have had PPI 2. Complained to their financial provider (themselves or through a Claims Management Company) 3. Heard back from their financial provider 4. Received money back, if they were entitled to it 5. None of the above 6. Don't know
Understanding of how to complain	<p>Which of these statements best describes your need to know more about how to make a PPI complaint?</p> <ol style="list-style-type: none"> 1. I know enough about how to make a PPI complaint 2. I would like to know more about how to make a PPI complaint 3. Don't know



Annex 3

Campaign budget break down

The full campaign cost of £42.2 million including VAT is paid for by 18 fee-paying firms who received the majority (around 90%) of PPI complaints.

2-year Budget breakdown	Forecast estimates (inc VAT)
Media (advertising spend)	£24.4m
Production (including talent fees)	£4.9m
Helpline and Website	£4.2m
Partnerships, PR and social media customer service	£3m
Agency fees	£3m
Evaluation and testing	£1.7m
Legal fees, staff costs, contingency	£1m
TOTAL	£42.2m

Annex 4

Detail on our supervisory priority workstreams

Firms' handling of checking enquiries

We conducted our review by:

- Liaising with the Ombudsman Service, which has conducted extensive work with firms on the quality of their checking processes.
- Sending a detailed information request to firms concerning their systems, processes, controls and risk management.
- Providing general feedback to firms on the positive findings and shortcomings we had identified, and firm-specific feedback on any areas they needed to improve.
- Engaging with firms on their proposed remedial steps to ensure these are completed in a timely fashion and to the correct quality standards.

Firms' Plevin mailing to previously rejected mis-selling complainants

We conducted our review by:

- Sending a detailed information request to firms that asked which cohorts of previously rejected mis-selling complainants they were planning to include or exclude, and why, and about how they were managing the mailing project and its risks.
- Reviewing the information provided by firms in response, comparing it and then aggregating into a single table all the types of previous complaints that firms were variously including or excluding.
- Sending this aggregated table to each firm, populated with their individual responses, with a request that they confirm or correct our understanding of their approach to such types, and fill in any gaps.
- Asking tailored further questions concerning each firm's governance and controls around its mailing.
- Reviewing the completed tables provided by firms, which enabled us to see where different firms had taken different views of particular types of previous complainants.
- Challenging some firms who were excluding types which we thought should be included (or which other firms were including), and inviting them to include these.



Vulnerable consumers workstream

With input from Goss Consultancy Limited (GCL), we accessed firms' PPI and accessibility pages to assess what features and services were available to support vulnerable consumers. This involved:

- Grouping the features and services offered by firms according to the particular accessibility needs they are most likely to support (recognising that some services and features will support a range of needs).
- Determining whether the information provided by firms relates to online accessibility or more general accessibility services, such as telephony or branch services (where applicable).
- Forming judgements on whether the services available represent a reasonable level of support and on the features and services that protected and vulnerable consumers should have access to as a minimum.
- Engaging with firms on what changes they need to make, and by when, to ensure their PPI content can be easily navigated by potentially vulnerable consumers as soon as possible.

We conducted testing of the compatibility of information on the home page, PPI information and online PPI-specific forms with assistive technology.³⁰ The review sought to identify whether the design of the website allowed assistive technology users to navigate the PPI content effectively, and focused on whether consumers with the following needs could access the website content:

- users of assistive technologies (such as screen readers or magnifiers)
- users who need to customise the look of the site (e.g. by zooming the content or changing to high contrast colours)
- users who are only able to use a computer with a keyboard (e.g. visually impaired consumers, or consumers with limited dexterity)

We commissioned user-experience testing by GCL's professional mystery shoppers. This focused on how easy it was to identify the PPI content from a firm's home page, and how easy the PPI content was to understand and use.

The testing also involved reviewing the online forms for PPI checking and complaints.³¹ The mystery shoppers had personal experience of the following accessibility needs:

- limited dexterity
- visual impairment
- communication issues (including dyslexia or where English is not first language)

30 Only those firms among those we sampled who clearly set out on their website that their site was accessible and usable for people using screen readers were tested. This did not constitute a formal audit.

31 It did not involve submitting any checking enquiries or complaints. This is because our review was focused on the web support available, rather than the entire customer journey.



We then set out our expectations as to the minimum level of online support that should be available to minimise potential barriers to checking or complaining about PPI, and asked firms to implement changes promptly where necessary.



Annex 5

Abbreviations used in this document

BSL	British sign language
CAB	Citizens Advice Bureau
CCA	Consumer Credit Act 1974
CMC	claims management company
DISP	Dispute resolution: Complaints sourcebook
DRO	debt relief order
DSAR	data subject access request
EIA	equality impact assessment
FCA	Financial Conduct Authority
FSMA	Financial Services and Markets Act 2000
GCL	Goss Consultancy Ltd
IVA	individual voluntary arrangement
LGBT	lesbian, gay, bisexual, transgender
KPI	key performance indicator
MMC	Multicultural Marketing Consultancy
No PPI	a PPI complaint that is rejected because the complainant had not bought a PPI policy
Plevin	Supreme Court judgment in Plevin v Paragon Personal Finance Ltd [2014] UKSC 61
PPI	payment protection insurance
PR	public relations
RND	recurring non-disclosure(s) of the existence of, or level of, commission and/or profit share
s.140A	section 140A of the CCA, which came into force in 2007

