

YEAR IN REVIEW 2025



COMMUNICATIONS
LOOKING AHEAD

POLICY & INSIGHT
CCTA EVENTS

ADVOCACY
PRESENTATIONS

LOOKING BACK
PUBLICATIONS





year in review 2025

looking back

I cannot personally reflect on over a century of CCTA history. However, 2025 certainly seems to have been one of the most demanding years for smaller and specialist lenders in recent memory.

We closed 2024 at pace and then came out firing on all cylinders at the start of the year.

Regulatory expectations continued to grow, the economic environment remained challenging, and several major policy interventions reshaped the operating landscape. Throughout all of this, the CCTA has prioritised clarity, proportionality, and the voice of smaller firms.

At the start of the year, we were still dealing with the consequences of the Court of Appeal (CoA) decision. Not long after, the appeal was heard at the Supreme Court, for which the CCTA also made submissions. While the Supreme Court overturned much of the CoA decision, the FCA then launched its industry-wide redress consultation.

Motor finance is such a ubiquitous financial product, used by so many UK families. The scale of the consultation increased considerably through investigations and reviews dating back to 2007. It was always going to be high on our agenda.

We worked closely with HM Treasury, the FCA and the Financial Ombudsman Service (FOS), provided written submissions, held member roundtables, and worked with wider stakeholders.

Throughout the process, our focus was constant: ensuring policymakers understood the practical realities for smaller lenders, the diversity of commission arrangements, and the need for a fair, legally sound, and proportionate solution.



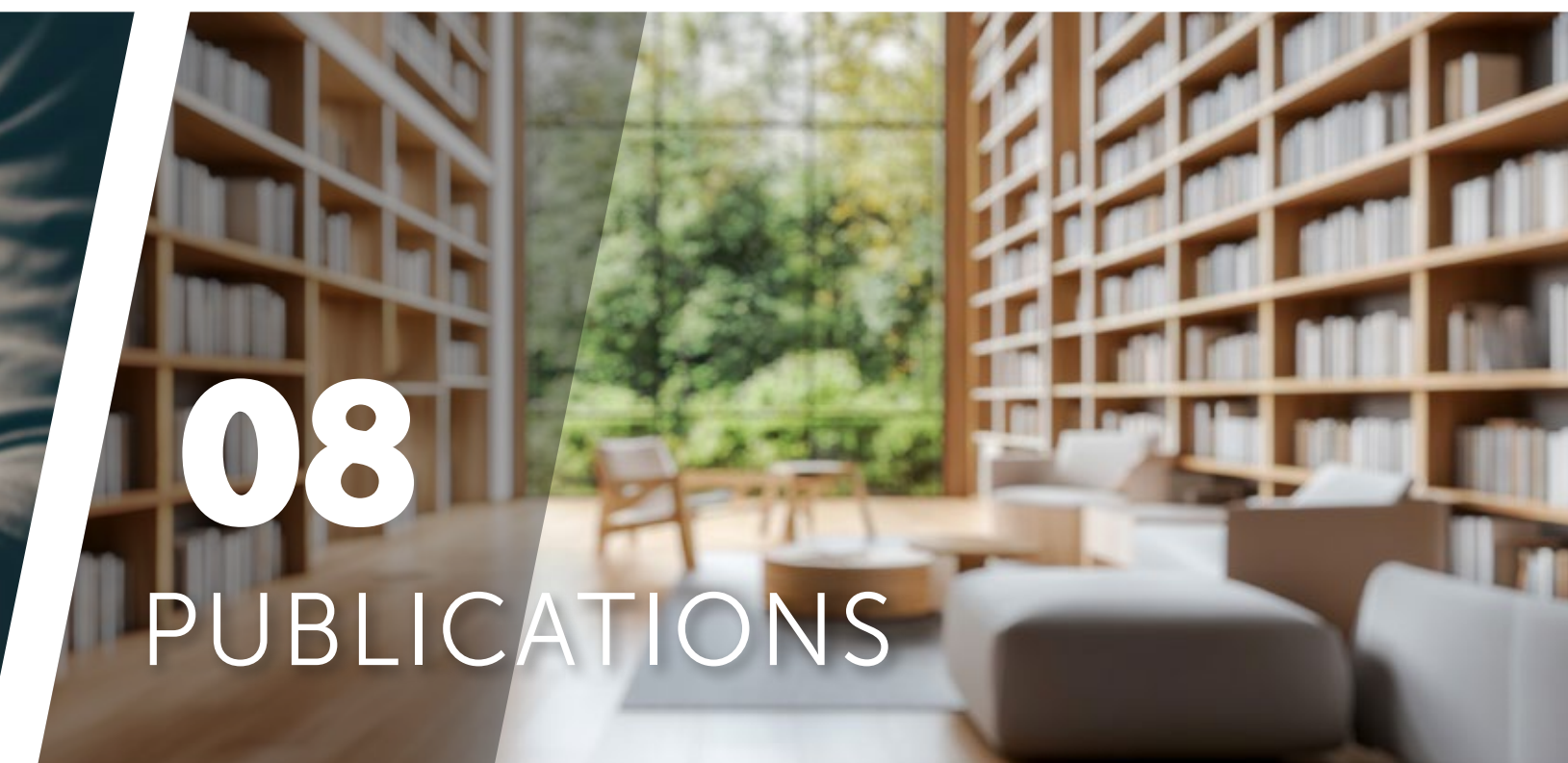
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18 LOOKING AHEAD



year in review 2025

looking back

In 2025, we also saw renewed political emphasis on financial inclusion. Access to credit has been at the heart of our work since our foundation in 1891. So, we were always keen to be involved. The new Government's commitment to a National Financial Inclusion Strategy has created opportunities for engagement - and we have tried to ensure that the role of smaller lenders remains central in these discussions.

The message that access to regulated, affordable credit matters has been at the heart of our advocacy.

Meanwhile, the campaign to improve the complaints landscape reached a milestone with the introduction of FOS charging for claims management companies (CMCs) and professional representatives.

For too long, lenders have been paying the case fee, win or lose. This fundamental flaw in the system required a change in the law. It arose from building alliances with other associations that shared concerns about the development of a claims culture in UK financial services.

Operationally, this year we launched our new website, expanded CCTA Academy, delivered new learning workshops, and enhanced communication with members. This was all delivered by a hard-working CCTA team.

As always, I also want to thank all CCTA members for their continued trust and support. Your engagement, insights, and willingness to collaborate underpin everything we deliver.

Jason Wassell
Chief Executive, CCTA

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Advocacy is all about being the strongest and best voice for our members.

It is sometimes about talking through the press and media. More often, it is about getting our message across to those who influence matters vital to us. Our advocacy focuses on three key organisations that shape our regulatory world: FCA, FOS, and HM Treasury. However, we are also building relationships with other organisations, such as debt charities, think tanks, researchers, and other trade associations.

JANUARY FEBRUARY

The year began with uncertainty in the motor finance sector. The only way to provide a clear path through was a definitive Supreme Court decision. To secure this option, CCTA made written submissions to the Supreme Court, urging the Justices to prioritise the case given its implications for access to regulated credit.

We were pleased when the Supreme Court listed the case for hearing in April. This early clarity on timing allowed us to begin structured engagement with HM Treasury and the FCA, ensuring policymakers understood the operational realities facing smaller lenders and the diversity of business models in the market.

MARCH APRIL

During early 2025, we engaged with HM Treasury on Phase 1 of the Consumer Credit Act Reform. The CCTA position was different from many other industry voices. While we could see clear problems with the Act, we also recognised that it offers consistency and certainty as a long-established piece of legislation.

We sought change, but with caution - pressing for simplification where it would genuinely help consumers and firms, while challenging proposals that risked creating new complexity or uncertainty.

MAY JUNE

Financial inclusion became a defining political theme following ministerial speeches that signalled a renewed commitment to tackling exclusion, illegal lending, and affordability pressures. CCTA briefed stakeholders, stating that financial inclusion depends on a diverse market, which includes smaller and specialist lenders.

The publication of new documentation relating to the emerging Credit Information Governance Body (CIGB) demanded immediate attention.

We raised concerns about cost allocations, reporting burdens and the risk of a system shaped around the needs of the largest lenders. Our focus was on ensuring that governance arrangements and funding models did not crowd out smaller firms or undermine their ability to lend responsibly.

JULY AUGUST

Our Summer Summit brought together industry, advisers and regulators for further discussion on AI, data and the future regulatory landscape. We know that AI will become an increasingly important issue for lenders of all sizes. Members shared both the opportunities they see and their concerns about regulators' ability to keep up with operational developments.

Later in the summer, the Supreme Court handed down its judgment in the Motor Finance Commission case. This brought long-awaited legal clarity but immediately increased the urgency of regulatory decisions. We moved quickly to analyse the judgment and to set out our priorities for any future redress scheme.





year in review 2025

advocacy

SEPTEMBER

OCTOBER

The FCA's draft proposals for the motor finance redress scheme dominated the autumn. We represented independent and smaller lenders throughout the process. As we move into 2026, in a market dominated by the big banks and finance providers linked to car makers, smaller lenders mustn't be lost.

Engagement with the FCA's Consumer Duty teams also intensified as we moved beyond the second-anniversary reports. Our workshops, roundtables and guidance papers were informed by direct conversations with the regulator and emerging expectations across supervision.

NOVEMBER

DECEMBER

As 2025 drew to a close, the policy landscape remained busy. The Treasury published the long-awaited National Financial Inclusion Strategy. It was clearly not the step change we had hoped for.

Meanwhile, the CIGB solidified its structure with the appointment of a Chair and Chief Executive. Direct communication with lenders began, prompting sector discussions about governance, reporting expectations and cost frameworks. We continued to argue for proportionality and meaningful representation for smaller firms within the new governance model.

2025 reinforced a message we know well: advocacy is continuous. This year, we worked to ensure that policymakers not only heard, but genuinely understood, the challenges, diversity and value of smaller lenders in the UK credit landscape.





In 2025, we delivered new guidance, ran workshops, and directly engaged with FCA teams to ensure that smaller firms received clear, practical support. Members told us that our sessions on board oversight and MI were particularly valuable.

MOTOR FINANCE

No issue dominated the year more than motor finance. It is a financial product used by many UK families and is a core product in consumer credit.

Following the Supreme Court's decision, the FCA raced into consultation on the redress scheme. Our policy team analysed the proposals, dissected their implications across different business models, and provided multiple detailed updates via roundtables, webinars, and written insight pieces.

We also worked with legal partners to help members understand developments in case law and their implications across the wider consumer credit sector.

FOS REFORM & TACKLING CMCs

2025 marked the introduction of FOS charging for CMCs and other professional representatives - an issue the CCTA has championed for several years. We worked closely with FOS during implementation, focusing on how charging interacts with Consumer Duty, DISP requirements and vulnerable customers.

However, we also saw the rise of the claims legal firms. We have concerns that these firms continue to use regulatory arbitrage to avoid the FCA's more rigid rules. As such, the focus shifts to ensuring the Solicitors Regulation Authority takes these matters seriously.

The CCTA team also supported firms in navigating the ongoing challenges posed by complaints, including training that covered issues such as root-cause analysis.

CREDIT INFORMATION & CIGB

The development of the new Credit Information Governance Body (CIGB) accelerated during 2025. As the year closes, the new organisation is in place.

We remained concerned about cost impacts on smaller firms, the feasibility of new reporting processes and the risk of a system shaped primarily around large lenders. The CCTA team responded to consultations, contributed to IWG follow-ups and ensured members received early insight into likely operational implications.

FINANCIAL INCLUSION

It was not a surprise when the Labour Government decided to undertake a project to examine financial inclusion. However, we were disappointed that much of the Financial Inclusion Strategy focused on traditional levers that are used whenever there is a policy debate over access to credit.

While we welcome plans to expand credit unions and CDFIs, we have long recognised that the solution has to be a blend of products. The CCTA and our members continue to push forward on financial inclusion.





year in review 2025 | communications



CCTA UPDATE

A weekly email that includes an update from our CEO, a round-up of industry news, events, LinkedIn latest and CCTA team activity.



PUBLICATION

These emails include links to CCTA Guidance, CCTA Magazine and CCTA Inform. A full review of 2025 publications can be found on page 8.



CCTA EVENT

CCTA Event emails include information and registration reminders for upcoming summits, workshops and conferences.



INFORMATION

Information emails provide updates on a range of subjects that are of interest to members. Our 2025 Information emails are listed here.

INFORMATION EMAILS

- 20 Jan** Reforming the mass redress system: FCA & FOS consultation
- 24 Jan** FCA review into commission arrangements
- 06 Feb** Consumer Duty update for members
- 07 Feb** CMC charging and implementation: FOS confirm details
- 13 Feb** FCA review of Consumer Duty board reports
- 03 Mar** CMC Update (2025 - 1)
- 11 Mar** FCA statement on motor finance commissions
- 27 Mar** Motor finance roundtable report
- 15 Apr** FCA Vulnerability Review
- 23 Apr** CMC Update (2025 - 2)
- 19 May** HMT Update: Consumer Credit Act & BNPL regulation
- 05 Jun** FCA update on possible redress scheme
- 12 Jun** Sustainable lending: FCA findings & improvement areas
- 02 Jul** Consumer Duty board reports
- 15 Jul** FOS reform consultations
- 01 Aug** Supreme Court judgment issued
- 02 Aug** Supreme Court judgment - update
- 09 Sep** FCA Redress Scheme & CMCs
- 07 Oct** FCA Consultation - Commission Complaints
- 09 Dec** CMC Update (2025 - 3)
- 11 Dec** Member feedback survey

JANUARY

FEBRUARY

MARCH

APRIL

MAY

JUNE

JULY

AUGUST

SEPTEMBER

OCTOBER

NOVEMBER

DECEMBER



year in review 2025

publications

BRIEFING

Consumer Duty
price & value outcome



BRIEFING

FCA review: Consumer
Duty board reports



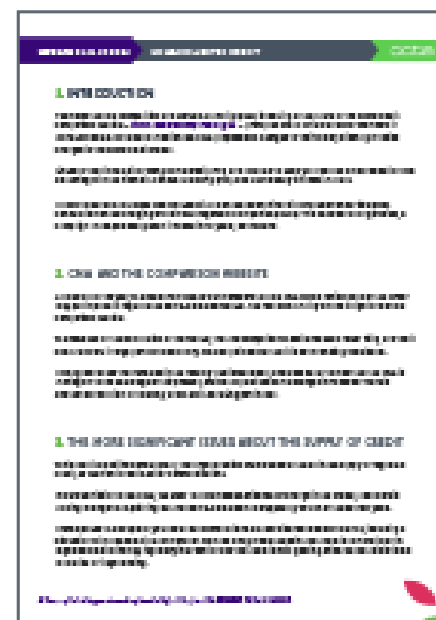
UPDATE

CMC update
2025 - 1



REPORT

Motor finance
roundtable - 1

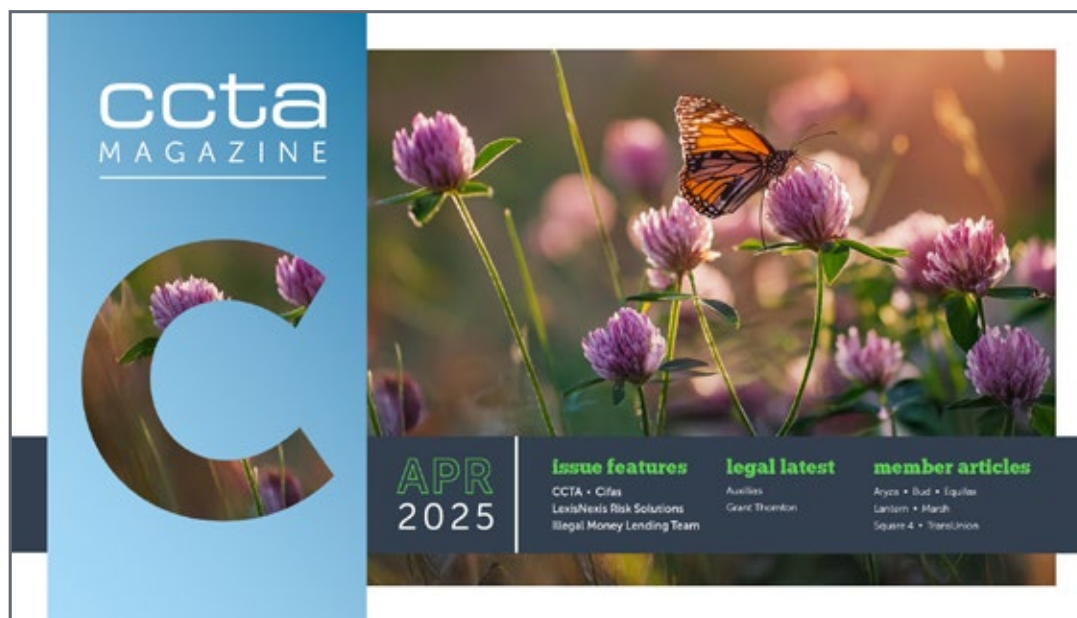


FEBRUARY

MARCH

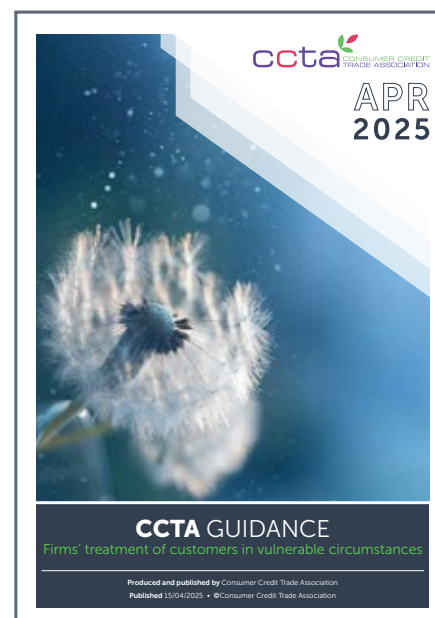
CCTA MAGAZINE

2025
Issue One



GUIDANCE

FCA vulnerability
review



UPDATE

CMC update
2025 - 2



APRIL



year in review 2025

publications



CCTA INFORM 2025 Spring Issue



CCTA MAGAZINE 2025 Issue Two



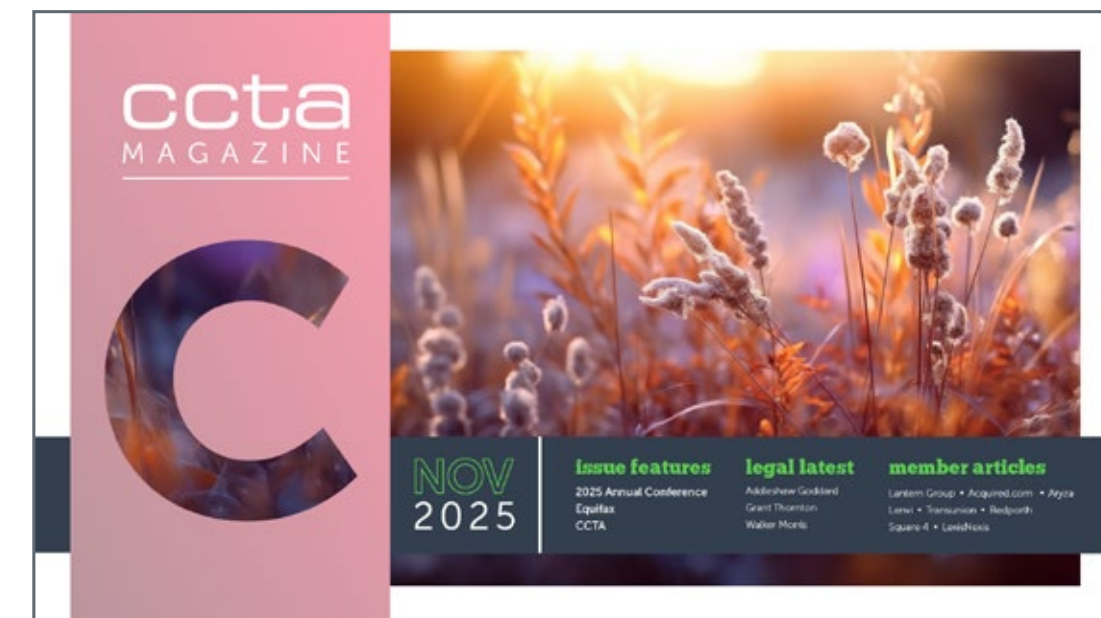
APRIL

JULY

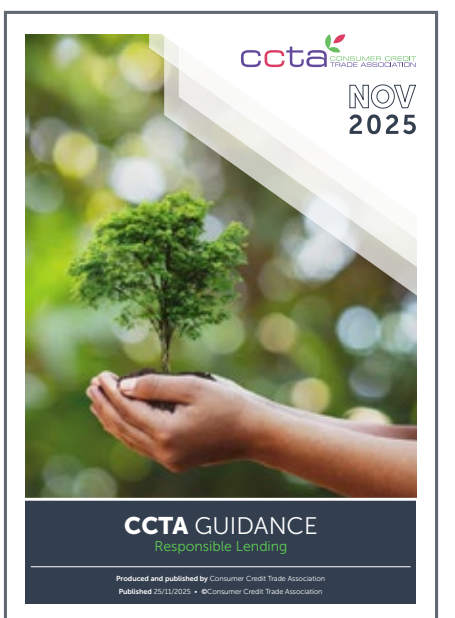
CCTA INFORM 2025 Autumn Issue



CCTA MAGAZINE 2025 Issue Three



GUIDANCE Responsible Lending



OCTOBER

NOVEMBER

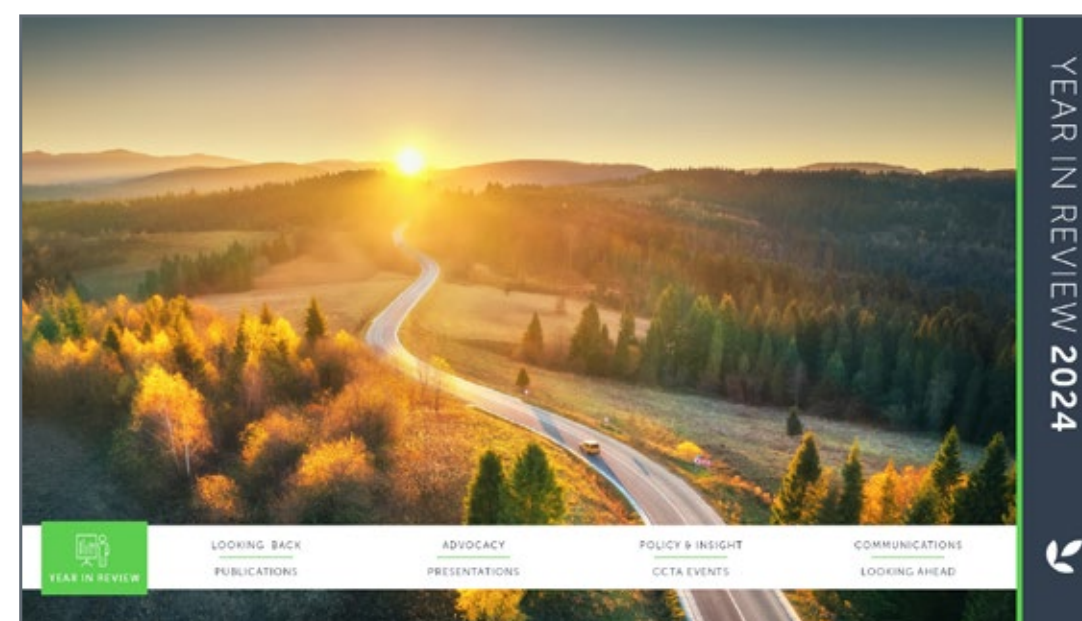


year in review 2025

publications

YEAR IN REVIEW

2025 Edition



CCTA INFORM

2025 Winter Issue



DECEMBER

UPDATE

CMC update
2025 - 3



Download publications from the **Member Hub**

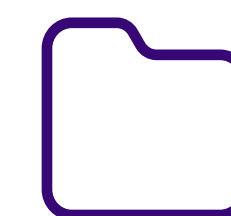
Member Hub



Key Issue Resources



Files





year in review 2025 | events

JANUARY



ROUNDTABLE Horizon Scanning

- Update from HM Treasury
Rebecca Denham, Head of Consumer Credit Unit, HM Treasury
Georgia Morrison, Senior Policy Advisor, HM Treasury
- Regulatory activity
Lucy Donovan, Head of Strategy & Communications, CCTA
- Motor finance sector update
Naveed Asif, Head of Policy & Advice, CCTA

FEBRUARY



ROUNDTABLE Motor Finance

- FOS update
Naveed Asif, Head of Policy & Advice, CCTA
- Update on Supreme Court & Judicial Review
Russell Kelsall, Head of Consumer & Motor Finance, Walker Morris
- Lender insights: DSARs & complaints
Dan Simpson, Risk & Compliance Director, Marsh Finance



LIVE LEARNING Understanding Personal Insolvencies

- Introduction to informal debt solutions
Vijay Bhatti, Principal Insolvency Consultant, Aryza

MARCH



CONFERENCE Vigilance

- Fraud
Stephen Dalton, Director of Intelligence, Cifas
- Anti-money laundering
Clare Hughes, Partner, Addleshaw Goddard LLP
- Member Panel
GAIN Credit • Evlo • Equifax • CCTA
- Cyber Security
Jason Wassell, Chief Executive, CCTA
- Illegal Lending
Anna Fraser, Liase Officer, Illegal Money Lending Team





year in review 2025 | events

APRIL



LIVE LEARNING

Illegal Money Lending Awareness

- Raising awareness of illegal lending schemes
- Impacts and consequences of borrowing from loan sharks
Pete Shone, LIAISE Officer, England Illegal Money Lending Team



WORKSHOP

Consumer Duty Board Reports

- Consumer Duty governing body reports
Paul Godsmark, Head of Advisory, Auxillias

JUNE



WORKSHOP

Vulnerable Customers in Financial Services

- Preconceptions and misconceptions
- Vulnerability characteristics
- Listening and questioning techniques
- Managing disclosure vs non-disclosure
- Tailored forbearance and effective signposting
- Link to Consumer Duty, culture and conduct
Naveed Asif, Head of Policy & Advice, CCTA

JUNE (continued)



WORKSHOP

Complaint Handling

- Welcome and scene setting
- Strategic framing
- Regulatory foundations
- Practical exercises
- Third parties and external pressure
- Using complaints to drive change
Jason Wassell, Chief Executive, CCTA
Lucy Donovan, Head of Strategy & Communications, CCTA

JULY



SUMMIT

Summer 2025

- The FCA's approach to AI
Emelie Bratt, Senior Associate, Regulatory, AI Strategy, FCA
- Artificial intelligence
Shannon Faulkner, Consultant, Auxillias
- Regulatory horizon scan
Lucy Donovan, Head of Strategy & Communications, CCTA
- Between the lines
Jason Wassell, Chief Executive, CCTA



year in review 2025 | events

AUGUST



ROUNDTABLE Motor Finance

- **Supreme Court decision**

Russell Kelsall, Head of Consumer & Motor Finance, Walker Morris

Dan Simpson, Risk & Compliance Director, Marsh Finance

Michael Deans, Managing Director, Borderway Finance

Naveed Asif, Head of Policy & Advice, CCTA

Jason Wassell, Chief Executive, CCTA

Jo Davis, Director/Partner, Auxillias

SEPTEMBER



CONFERENCE CCTA 2025 Annual Conference

- **Asure 4:**

Revolutionising outcomes testing with AI

Nicola Crump, Advisory Director, Square 4

- **StepChange and Evlo:**

A collaborative model for better outcomes

Asif Nadeem, Chief Transformation Officer

Sara Dias-Foster, Business Development Manager, StepChange

SEPTEMBER (continued)

- **Supercharge customer understanding:**

Make numbers your communication superpower

Mike Ellicock, Chief Executive, Plain Numbers

- **CCTA Academy:** Update

Naveed Asif, Head of Policy & Advice, CCTA

- **FCA strategy:** How it supports a well functioning consumer credit market

Mark Burns, Head of Consumer Finance, FCA

- **Regulatory Panel**

Changes ahead: Navigating regulatory developments

Borderway Finance • Auxillias • Snap-on • Addleshaw Goddard

- **CATO unlocked:** Enhanced data for better decision making

Andrea Cox, Affordability Director, Equifax

- **HM Treasury:** Update

Rebecca Denham, Head of Consumer Credit Unit, HM Treasury

- **Technology & Innovation Panel**

A new voyage: How data is helping firms innovate

Aryza • LexisNexis Risk Solutions • coeo UK

SEPTEMBER (continued)

- **Johnson, commissions and compliance:**

What firms should do next

Russell Kelsall, Head of Consumer & Motor Finance, Walker Morris

- **The future of recurring payments:**

How VRPs can improve collections

Lawrence Byers, Senior Product Manager, Acquired.com

Rachael Magowan, Chief Technology Officer, Moneyline

- **The FOS:** Modernising the redress system

Charlotte Wilson, Ombudsman Leader, FOS





year in review 2025 | events

OCTOBER



ROUNDTABLE Motor Finance

- FCA commission consultation

Russell Kelsall, Head of Consumer & Motor Finance, Walker Morris

Dan Simpson, Risk & Compliance Director, Marsh Finance

Michael Deans, Managing Director, Borderway Finance

Naveed Asif, Head of Policy & Advice, CCTA

Jo Davis, Director/Partner, Auxillias

NOVEMBER



WORKSHOP Responsible Lending

- Events and publications relating to responsible lending
- Responsible lending: The four key components
- Wider considerations: Tailored approach
- Insights: CCTA • FCA • FOS
- Follow-up CCTA Guidance Paper

Naveed Asif, Head of Policy & Advice, CCTA

DECEMBER



ROUNDTABLE Motor Finance

- Consultation responses, open standards & CMC Update

Russell Kelsall, Head of Consumer & Motor Finance, Walker Morris

Dan Simpson, Risk & Compliance Director, Marsh Finance

Michael Deans, Managing Director, Borderway Finance

Naveed Asif, Head of Policy & Advice, CCTA

Jo Davis, Director/Partner, Auxillias



LIVE LEARNING Consumer Duty for Frontline Staff

- Understanding your firm's Consumer Duty requirement
- The four consumer outcomes & the role of frontline staff
- Good staff practices for better consumer outcomes

Naveed Asif, Head of Policy & Advice, CCTA

DECEMBER (continued)



SUMMIT Winter 2025

- Update on CCTA activity

Jason Wassell, Chief Executive, CCTA

- Commissions: The story so far

Naveed Asif, Head of Policy & Advice, CCTA

- Financial inclusion strategy & working with Fair4All

Kate Pender, Chief Executive, Fair4All Finance

- The regulatory landscape: Reflection & looking ahead

Roma Pearson, Senior Advisory Director, Square 4

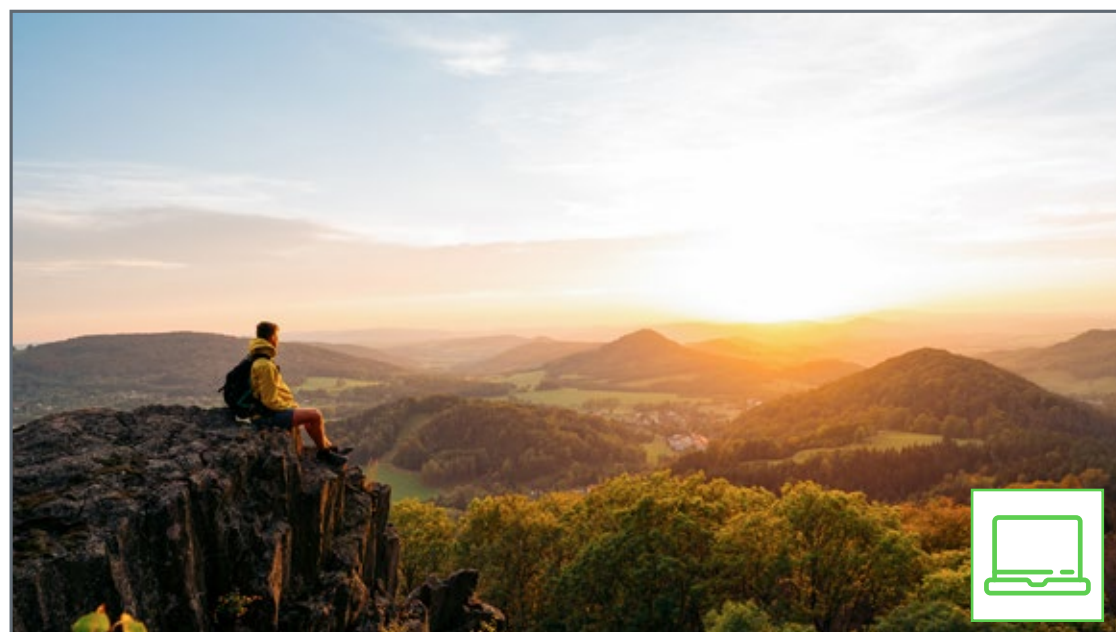




year in review 2025 | events



ROUNDTABLE
HORIZON SCANNING



ROUNDTABLE
MOTOR FINANCE



LIVE LEARNING
COMPLAINT HANDLING



CONFERENCE
VIGILANCE



JANUARY

FEBRUARY

MARCH



LIVE LEARNING
ILLEGAL MONEY LENDING



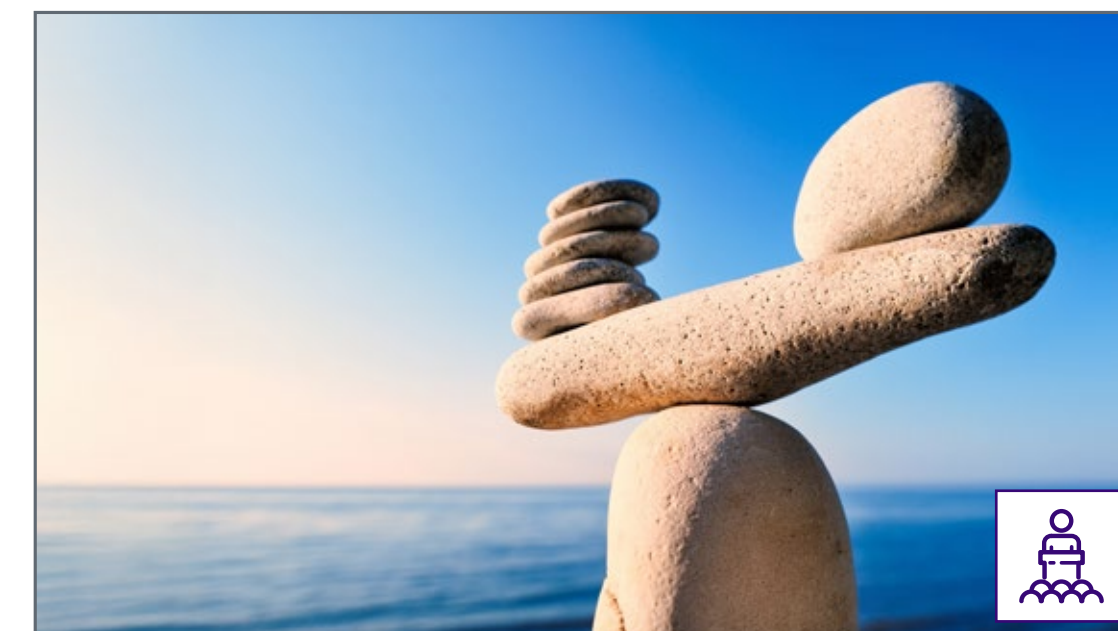
WORKSHOP
CONSUMER DUTY BOARD REPORTS



WORKSHOP
VULNERABLE CUSTOMERS



WORKSHOP
COMPLAINT HANDLING - LEEDS



APRIL

JUNE



WORKSHOP

COMPLAINT HANDLING - LONDON





SUMMIT

SUMMER 2025





ROUNDTABLE

MOTOR FINANCE





CONFERENCE

MEMBER DINNER



JUNE

JULY

AUGUST

SEPTEMBER



CONFERENCE

2025 ANNUAL CONFERENCE





ROUNDTABLE

MOTOR FINANCE





WORKSHOP

RESPONSIBLE LENDING





ROUNDTABLE

MOTOR FINANCE



SEPTEMBER

OCTOBER

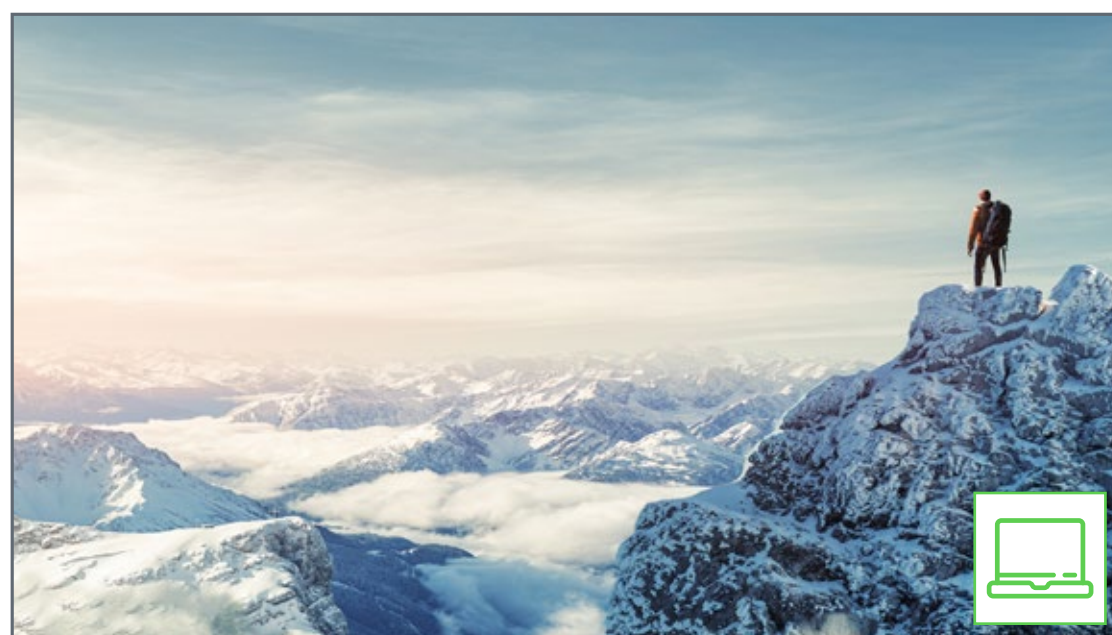
NOVEMBER

DECEMBER

 **LIVE LEARNING**
CONSUMER DUTY - FRONTLINE STAFF



 **SUMMIT**
WINTER 2025



DECEMBER

Never miss an event

Update your email contacts in the **Member Hub**



“The conference provided a great opportunity to catch up with familiar faces and meet new acquaintances from across the industry. The speakers were engaging and covered a wide range of topics, giving valuable insights into the key challenges and opportunities firms are facing today which left us feeling inspired and motivated. Thanks to the team for a great event. I'm looking forward to the next!”

Debbie Gandy, GAIN Credit



ADVOCACY

Some long-term issues will continue into 2026.

The motor finance redress scheme will remain a central area of interest for CCTA. As mentioned, we will be advocating on behalf of smaller lenders as the FCA moves from consultation to implementation. It will be essential to explain clearly how the exit of smaller lenders would create market gaps and reduce access to regulated credit.

Reform of the Consumer Credit Act (CCA) will continue. We will be working on behalf of members to simplify outdated parts of the Act for firms and consumers alike, while defending elements that still provide sound clarity and protection.

Access to credit has been at the heart of our advocacy work since our formation over a century ago. While the National Financial Inclusion Strategy was not the game-changer we hoped it might be, we will be pushing forward with a number of initiatives. Our plan is not to be bound by the Strategy, but to look for areas of partnership with other organisations where we can make a practical difference.

We have campaigned for change to the Financial Ombudsman Service (FOS), and we are pleased to see opportunities now emerging. An area of advocacy work in the years ahead will be further reform of the FOS. The CCTA team will also be pushing for improvements to everyday processes, alongside a rethink of how mass-redress events are handled.

We will continue to meet with HM Treasury officials and involve the Ministerial team where necessary. A central message in all our advocacy work will remain the need for consumers to be able to access regulated credit through a diverse, sustainable market.

POLICY & INSIGHT

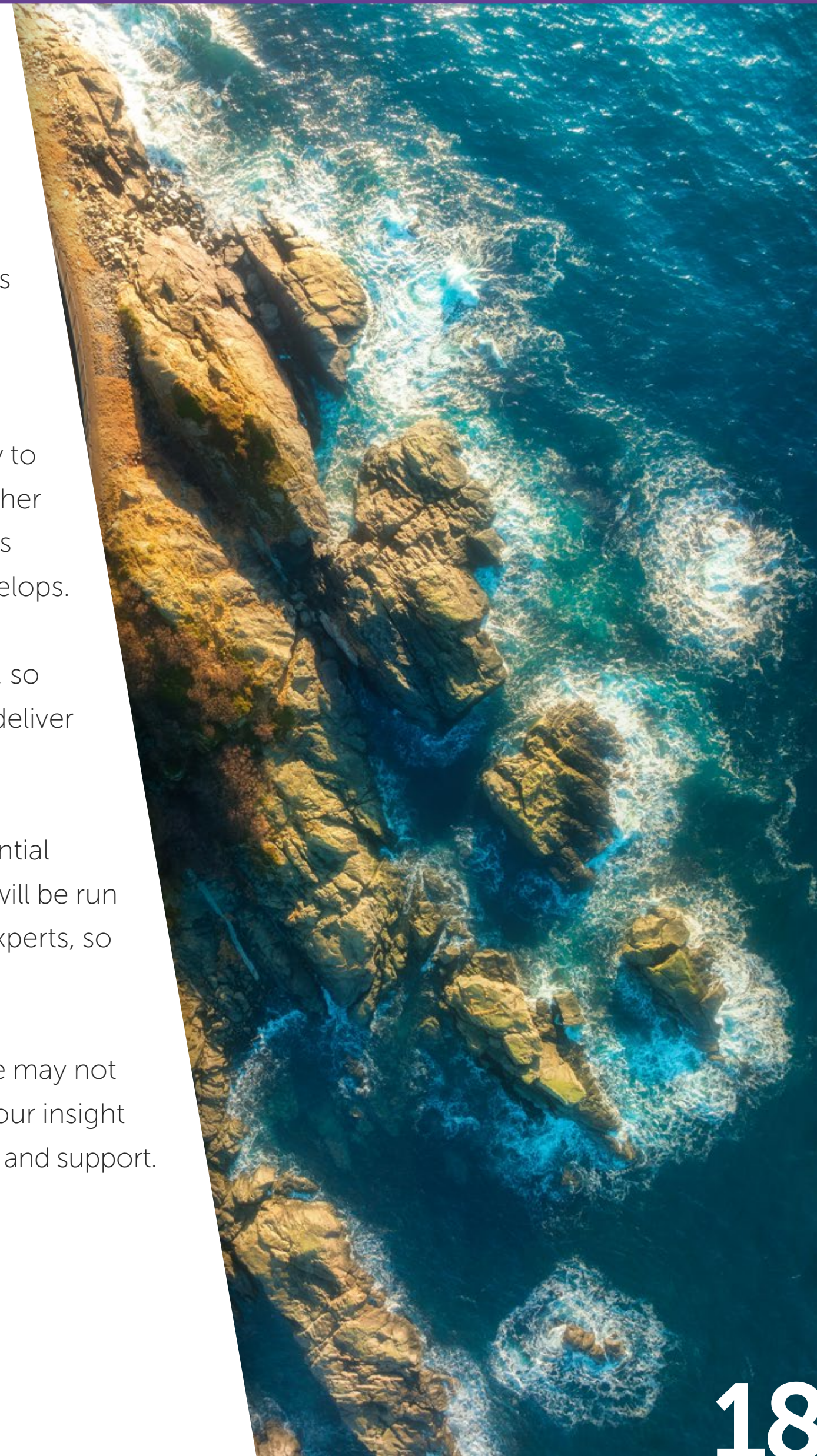
We are keen to continue providing insight and advice on how lenders can fully implement the Consumer Duty. The CCTA understands that regulators see this as a journey, not a destination. That requires ongoing discussion to better understand expectations and to translate them into advice that works for our members.

Complaint-handling will remain a core focus. It is important for delivering good outcomes to individual customers, but it is also key to identifying areas for future improvement. We expect to provide further workshops and guidance papers, particularly as the new complaints environment under mass-redress schemes and CMC charging develops.

The involvement of claims companies can make this more difficult, so we will continue to draw together our members' experiences and deliver them as updates and practical advice.

We have plans to run a series of workshops on our key issues. Potential areas include responsible lending and vulnerability. Many of these will be run in conjunction with associates and other external subject-matter experts, so that members hear directly from those working at the sharp end.

In 2026, we also want to go a little further afield, exploring areas we may not have covered before. We will be led by our membership, focusing our insight work on the topics where smaller lenders most need clarity, certainty and support.





year in review 2025

looking ahead

PLANS FOR 2026

CCTA EVENTS

SUMMITS

We aim to hold two summits in 2026, both of which will be online events. Along with the standard update from CCTA, there will also be a range of guest speakers and panels that end with a Q&A session for members.

SPRING CONFERENCE: CATALYST

Catalyst will explore the technologies, policies, and market forces driving the next phase of consumer credit evolution. With AI at the forefront, we will consider the opportunities and risks shaping the sector.

LIVE LEARNING

Since launching CCTA Academy, one of the most popular services have been our Live Learning sessions. These online events enhance staff skills and knowledge by providing valuable insights and guidance on key regulatory matters that affect our members. As such, 2026 will see us bring more Live Learning sessions in areas such as complaint handling, financial promotions and tailored forbearance.

ANNUAL CONFERENCE & CASUAL DINNER

Our flagship conference and casual dinner is planned to take place in late autumn 2026. We will contact associate members in due course with supporter opportunities. Further details will be announced in the new year.

WORKSHOPS

Several of our associate members have been invited to work with us on a range of online workshops. Details of these events will be sent via email to members.

ROUNDTABLES

A range of roundtables will be held for different sectors of the membership.

CCTA PUBLICATIONS

CCTA MAGAZINE

Our longstanding magazine will be released tri-annually with targeted dates in March, July and November. Members can submit content for consideration to marketing@ccta.co.uk. Associate members are welcome to supply articles, member news and request updates to their directory listing throughout the year.

CCTA INFORM

Our member exclusive regulatory round-up will be released tri-annually with targeted dates in April, August and December.

CCTA GUIDANCE

Guidance papers will be released on key regulatory topics as they emerge. These will be emailed to members and made available in the Member Hub of the CCTA website.

YEAR IN REVIEW

We will continue to publish this each year, to give members an overview of CCTA activities over the last twelve months.





We are one of the longest-established trade associations in the financial services sector, representing the interests of alternative lenders for over 130 years. We represent over 150 regulated firms in alternative lending and are at the heart of a more extensive network of smaller firms.

These are often smaller firms involved in alternative lending sectors such as home-collected credit, high-cost short-term, motor finance, logbook loans, pawnbroking, and lending for smaller retailers. Our members lend to customers under served or not served by mainstream lenders.

Members look to us to provide guidance and support regarding all regulatory matters. We are advocates for our network of lenders, brokers and associates.

contact us

membership@ccta.co.uk 

ccta.co.uk 

[linkedin](#) 