

Payment protection insurance complaints deadline – Final Report

April 2020

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1 Overview

Purpose of this report

1.1

Since 2011, over **32.4m complaints** about payment protection insurance (PPI) have been made to firms, who have so far **paid over £38b of redress** (see Annex F). PPI is by far the largest consumer redress exercise in the UK's history.

1.2

This report reviews the impact of the 29 August 2019 deadline for new PPI complaints and the 2-year consumer communications campaign that preceded it.

1.3

The campaign and deadline helped prompt millions of consumers to act. For some this meant checking for a PPI policy and making a complaint. Firms continue to handle these.

1.4

This is our final report on PPI and closes our project work on the issue. But it outlines how we will continue to ensure that firms complete their handling of the remaining PPI complaints fairly.

Who should read this report?

1.5

This report will be most relevant to those who commented on earlier PPI publications (consultation papers; policy statements; progress report), including:

- consumer bodies, community groups and charities – particularly those who supported consumers who had concerns about PPI
- industry – particularly retail firms who sold PPI or provided credit, and claims management companies (CMCs)
- public bodies – in particular, those involved in the PPI process, such as the Financial Ombudsman Service (the Ombudsman Service)

1.6

We have published an accompanying press release which provides a high-level summary.

Background

1.7

On 29 August 2017, we launched the package of measures we had set out in March 2017:

- A deadline of 29 August 2019. Consumers needed to make any new complaints about the sale of PPI (or about matters related to the sale) by this deadline or lose their right to have them assessed by firms or the Ombudsman Service.

- An FCA-led large scale communications campaign to inform consumers of the deadline and help prompt them to decide whether to act. This was funded by 18 firms at a cost of £42.2m.
- Rules and guidance on the fair handling of PPI complaints in light of Plevin (the Supreme Court judgment of November 2014 about a lender's undisclosed PPI commission). This included requiring firms to write to previously rejected mis-selling complainants to tell them they could make a new complaint in light of Plevin.

1.8 Our rationale for implementing this package of measures was that it:

- would prompt many consumers who wanted to complain about PPI (or check if they had it) but had not yet done so, to act
- might lead to more redress being paid directly to consumers, rather than to CMCs
- might make firms handle PPI complaints more efficiently
- would help bring an orderly response to Plevin
- would bring the PPI issue to an orderly conclusion, reducing uncertainty for firms about long-term PPI liabilities and helping rebuild public trust in the retail financial sector

1.9 In our progress report of October 2018, we concluded that we were making progress in line with our aims, and that in year 2 our:

- campaign would focus on continuing to build awareness and strengthening consumers' understanding of what to do before the deadline
- supervisory work would include a focus on ensuring firms prepared themselves to deal fairly and effectively with complaints in the final run-up to the deadline.

2 Executive summary

Our communications campaign

- 2.1** On 29 August 2017, we launched a national communications campaign to tell all UK adults about the 2-year deadline for making new PPI complaints. Our aim was to reach everyone who may have been sold PPI, and give them the knowledge and information to decide whether to act ahead of the 29 August 2019 deadline.
- 2.2** The campaign had several objectives. The priority was to raise awareness of the deadline, signpost our website and helpline, and prompt all those who intended to act to do so in time. We measured our delivery of these objectives using key performance indicators (KPIs).
- 2.3** The multi-channel campaign ran for 2 years and used various channels to communicate our message. We:
- delivered 4 phases of advertising and 6 public relations (PR) launches to reach and engage our audience
 - worked with 34 partners and visited communities in 21 locations across the UK to engage harder-to-reach groups
 - offered help and support to consumers across several platforms: a dedicated PPI website and helpline, social media channels, and face-to-face support
- 2.4** The campaign was a success. We increased the performance on all KPIs compared to pre-campaign levels, meeting all our objectives.
- 2.5** Across the 2 years, the campaign was recognised by 32 million people who were representative of all regions, genders and age groups.
- 2.6** Raising awareness of the PPI deadline was our main objective. We successfully increased this KPI by 18 percentage points, with 71% of our target audience aware of the PPI deadline by the end of the campaign.
- 2.7** The campaign drove unprecedented volumes of people to our website and helpline. When a new phase of advertising came on air, we saw the web response increase by 405% and helpline calls by 180% on average. During the 2-year period, we provided information and help to 6.2 million people through our website and over 110,000 through our helpline.
- 2.8** As well as these overarching campaign objectives, we aimed to deliver communications that met the needs of protected and vulnerable groups. We report in Annex C on all the steps we took to do this.

Our supervisory work before the deadline

- 2.9** A key supervisory aim after October 2018 was ensuring that firms maintained and further improved consumers' access to the complaints process, particularly for vulnerable consumers (see 4.2-4.9).
- 2.10** We also engaged intensively with industry to ensure that consumers who acted close to the deadline did not lose out. In particular, we helped drive firms' commitment to allow checking enquiries to be made right up to the deadline and to automatically convert these into complaints where PPI was found, even if it was found only after the deadline.
- 2.11** This and other commitments by firms, such as pragmatically accepting postal complaints arriving up to 5 working days after the deadline, reduced the risk of any consumers who wanted to act being unreasonably cut-off by the deadline.

Consumers' actions in the run-up to the deadline

- 2.12** The combination of our communications campaign and our work with firms making it easier for consumers to act, seemed to lead to further increases in consumer action.
- 2.13** In the final 14 months of the campaign (July 2018 to August 2019):

- **8.9m PPI complaints** were submitted; this compared to 3.7m in the first 10 months
- **46.7m checking enquiries** were submitted, a significant increase on the first 10 months

- 2.14** In our October 2018 report we said there had been 8.4m checking enquiries in the first 10 months of the campaign, but we lacked a full data set then and that figure represented only a sub-set of firms who together generally receive around 60% of enquiries.
- 2.15** 92% of the checking enquiries were submitted through CMCs, mostly in bulk spreadsheets. However, 55% of the complaints were submitted by individual consumers, and only 45% through CMCs. This was the same as in the first 10 months of our campaign, which had already reversed the 55% CMC share of complaints in the period before the campaign.
- 2.16** Complaints were mainly submitted by letter (50%), online (35%), or phone (6%).
- 2.17** The growth in volumes was especially dramatic in the final months of the campaign, with:

- **570,000** complaints in June 2019 (the most in one month since October 2012)
- **800,000** complaints in July 2019
- **1.4m** complaints in August 2019

2.18 Checking enquiries rose even more dramatically (see Annex E), with:

• **16.9m checking enquires** submitted in August 2019 alone

- 2.19** Many of these very high August volumes were submitted in the final few days and hours before the deadline. For example, some firms received as many enquiries and complaints in the last 3 days as in the previous 4 weeks.
- 2.20** This last-minute volume brought very heavy PPI traffic through all channels. Some firms reported receiving peak hourly online volumes that were 25 times higher than usual, and as many phone calls on 28 and 29 August as in the previous two months.
- 2.21** Nonetheless, most firms reported unbroken availability of their online submission and phone lines (although with significant call wait times at certain periods, during which recorded messages encouraged callers to submit online).
- 2.22** Firms also received very high postal volumes, and thousands of emails from some CMCs, each containing thousands of checking enquiries or complaints.
- 2.23** At our invitation, some firms agreed to accept submissions via e mail that they had received just before (or in some cases just after) the deadline, even though this was not a channel they had previously accepted submissions through (mainly for reasons of security).
- 2.24** In the 3 months after the deadline, firms received around 50,000 complaints. Some were bulk submissions from CMCs made soon after the deadline. Many others were identified as copies, often in another medium, of complaints sent before the deadline. Of the genuinely new post-deadline complaints, most were made without prior checking enquiries and only a minority were likely to involve consumers who had PPI.
- 2.25** Overall, therefore, there is little to suggest that there were many consumers who wished to complain, and had PPI, but ran out of time to do so. We have not seen media or social media stories claiming individual consumers had been denied opportunity to complain, or other evidence of this.
- 2.26** Auto-conversion and the other commitments by firms greatly increased the number of complaints that firms are having to handle, compared to a strict application of our deadline. For example, 1.1m complaints have been converted from positive checking enquiries in the 3 months since the deadline. This number will have risen since as firms completed their assessment of the outstanding checking enquiries.

Consumers' outcomes

- 2.27** Of the tens of millions of checking enquiries that firms assessed between July 2018 and November 2019, around 13% were found to be repeat enquiries or weren't searched for another valid reason. Of the remaining checking enquiries, around 19% were found to have had a PPI policy in the past.
- 2.28** This 'find rate' tended to fall in the later part of the campaign (see 4.46). It has been much lower for the very large volume of checking enquiries submitted in the final

2 months before the deadline. That very large sifting exercise has put significant extra pressure on firms' operations and their ability to deliver prompt decisions on enquiries and complaints.

2.29 In the same period, firms gave 6.7m complaints decisions. Of these, firms concluded in 1.7 m cases (26%) that there was 'No PPI'. These cases were mostly complaints submitted without any prior checking enquiry.

2.30 Of the 5m complaints that did involve a past PPI policy, firms upheld **87%**. This very high uphold rate reflects the combination of:

- 71% of complaints assessed for mis-selling (at 'Step 1') being upheld (which broadly maintains the average mis-selling uphold rate since 2014), and
- 54% of complaints assessed for high undisclosed commission (at 'Step 2') being upheld as involving an unfair relationship under the Consumer Credit Act

2.31

In the last 14 months of the campaign, **firms paid out £5.4b of redress** for upheld complaints, compared to £3.7bn in the first 10 months of the campaign.

2.32 The average redress was around £2000 for mis-sales and around £740 for unfair credit relationships, reflecting the different bases for redress in the two types of cases.

2.33 Redress will continue to be paid for some months yet, as firms conclude their handling of the remaining complaints.

2.34 Firms further improved their PPI performance at the Ombudsman Service. This continued the previous trajectory towards a level which is now more typical of complaints to the Ombudsman Service about many other products and services:

- In financial year 2018/19, the Ombudsman Service upheld just 21% of the PPI complaints referred to it in favour of the consumer, a lower proportion than ever before.
- In the first 3 quarters of financial year 2019/20, this fell further to 17%.

2.35 This implied that firms were continuing to make improvements in PPI complaint handling, in particular, improving engagement with the Ombudsman Service and learnings from its decisions. This view has been confirmed by our regular discussions with the Ombudsman Service.

2.36 Of complaints submitted since the deadline, firms identified 3,000 (as at end November 2019) as involving genuine exceptional circumstances that had caused the consumer to complain late. We expected this rate to be low, as the 'exceptional' hurdle is a high one.

2.37 The kinds of circumstances firms identified as exceptional include prolonged serious illness through the campaign period, an acute health issue close to the deadline, or a family bereavement close to the deadline. Based on what we and the Ombudsman Service have seen in the past, our view is that most firms have assessed exceptional circumstances for complaints generally in an appropriate way, and we expect firms to continue to learn from the Ombudsman Service's approach as they receive answers on any referred PPI complaints.

- 2.38** Overall, our assessment remains that firms have maintained delivery of good consumer outcomes through accurate checking for PPI and fair and consistent complaint decisions.

Complaints remaining to be assessed

2.39

Over **12.6m PPI complaints were submitted or converted during our 2-year campaign**. This is more than twice the number in the 2 years before our campaign.

- 2.40** Firms made reasoned assumptions about potential deadline volumes, and operational preparations. We checked both. But the final volumes, particularly of enquiries, turned out to be much larger than expected, and significantly exceeded firms' planned capacity.
- 2.41** However, with our strong encouragement, firms took steps to further increase their capacity, including through recruiting and training extra staff, and additional automation. These steps put firms in a position to provide most remaining complaints with final responses by summer 2020.
- 2.42** We accept that this timescale was well outside the usual 8-week complaint handling we expect. However, for complainants who turn out to be due redress, interest on that redress will continue to grow during the delay in handling.
- 2.43** We made clear to firms that they should be alert to the position of individual vulnerable consumers, including those who may be in financial difficulty. Firms should consider whether it would be appropriate in the individual circumstances to handle these consumers' complaints sooner.
- 2.44** We have also emphasised to firms how important it is that they communicate clearly to all complainants about when they can expect to get a final response, and the reasons for the delay, to reassure them that their cases will be dealt with.

Next steps

- 2.45** Ensuring that firms achieve fair resolution of the remaining PPI complaints remains our aim, but this is now part of our business as usual supervision of firms. Our supervisors will continue to monitor firms' progress, including their dealings with the Ombudsman Service, and will act appropriately on any relevant intelligence about PPI complaint-handling they receive.
- 2.46** We will continue to publish monthly figures for PPI redress paid until all complaints have been dealt with.
- 2.47** We know that some consumers are now making PPI claims in the courts. This is their right and is unaffected by the deadline we set for PPI complaints. CMCs have obligations under our rules to ensure that any marketing they provide to consumers about the process for making claims in court is clear, fair and not misleading, and we will be monitoring CMCs' conduct.

Conclusion

- 2.48** Firms still need to assess the remaining PPI complaints, but this reflects the fact that so many consumers acted before the deadline, just as our campaign prompted.
- 2.49** We always took the view that, from the perspective of our package of measures and its aims, the priority was prompting consumer action and ensuring access, even if this meant greater pressure down the line on firms' handling and its timeliness.
- 2.50** So, we feel able to conclude that we have achieved the aims we set out in 2017:
- The deadline and communications campaign together successfully prompted consumers who wanted to complain or check if they had PPI to do so. The campaign reached many consumers who were not previously engaged with PPI communications, resulting in many taking action who would not otherwise have done.
 - The great majority of consumers who acted received fair and consistent outcomes at the earliest stages in the checking and complaints processes, including in light of Plevin, and firms' PPI complaints handling became increasingly efficient.
 - A greater share of redress was paid directly to consumers, rather than to CMCs, than would otherwise have been the case.
 - Firms' uncertainty about their long-term PPI liabilities has been reduced.
- 2.51** We consider that, overall, the PPI issue has been brought to an orderly conclusion in a way that has secured appropriate protection for consumers and enhanced the integrity of the UK financial system. This will help to rebuild public trust in the retail financial sector.

3 Our communications campaign

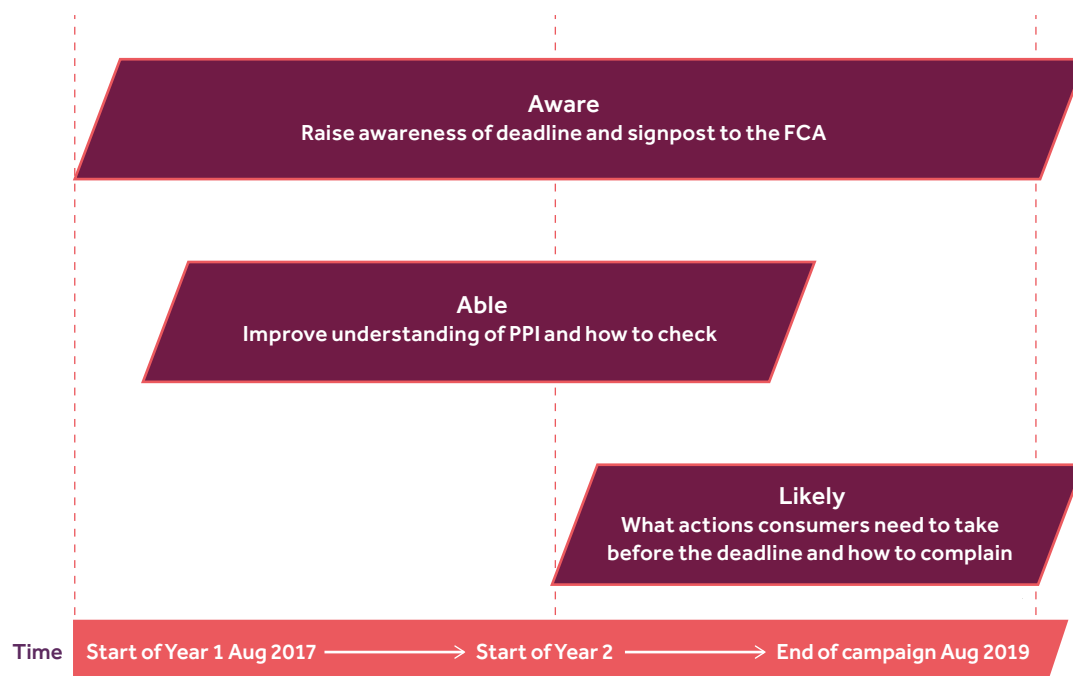
Background

- 3.1** On 29 August 2017, we launched a national communications campaign to inform consumers that there was now a 2-year deadline for making new PPI complaints. The campaign was rooted in research insight. Before we launched the campaign, we captured the views of over 25,000 people, to understand their attitudes to and awareness of PPI.
- 3.2** As we set out in March 2017, the main campaign objectives were to:
- raise awareness of the deadline and 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
 - signpost consumers to appropriate help
- 3.3** To achieve our objectives, we designed a multi-channel communications campaign using a combination of advertising, media and public relations (PR), digital content, social media and partnerships. All channels directed people to the dedicated FCA PPI website and helpline for all the information they would need about PPI.
- 3.4** Communications were designed to reach and engage all UK adults over 25 years old, including vulnerable consumers and those with protected characteristics. Throughout this section, when we refer to 'all adults' we mean all UK adults over 25.

Campaign overview

- 3.5** Across the 2-year campaign, we delivered 4 phases of advertising, 6 consumer-facing PR launches and worked with 34 partners.
- 3.6** In year 1, we delivered 2 phases of advertising. Our October 2018 report showed that these phases had established awareness of the deadline, improved understanding of PPI and significantly increased understanding of how to check if you had PPI. We signposted 1.7 million people to our website and 26,500 to our helpline for detailed information on PPI, including on the issues of mis-selling and undisclosed high commission earned by a provider (Plevin).
- 3.7** In year 2, we delivered 2 more phases of advertising. Our aim was to continue building awareness of the deadline date. Alongside that, we aimed to prompt all those who intended to check if they had PPI, or complain, to act ahead of the deadline. We sought to increase understanding of how to complain about PPI, and continue to signpost to our website and helpline for information and support.

3.8 We set out the messaging priorities for year 1 and year 2 below:



Measurement and tracking

3.9 Throughout the campaign, we used a series of data sets to assess and improve each phase of our advertising and communications. We conducted national quarterly face-to-face surveys before and after each phase of advertising and monthly online surveys to track monthly trends. The majority of statistics given in this section are taken from these surveys unless otherwise stated. We give more details on the methodology, including base sizes and survey questions, in Annex A.

Campaign performance

- 3.10** Our multi-channel campaign was made up of different elements all working together to deliver our objectives. We explore each of these in turn, explaining their overarching purpose and key details of the approach. Annex B is an image bank of the campaign assets and imagery used across each channel.

Advertising

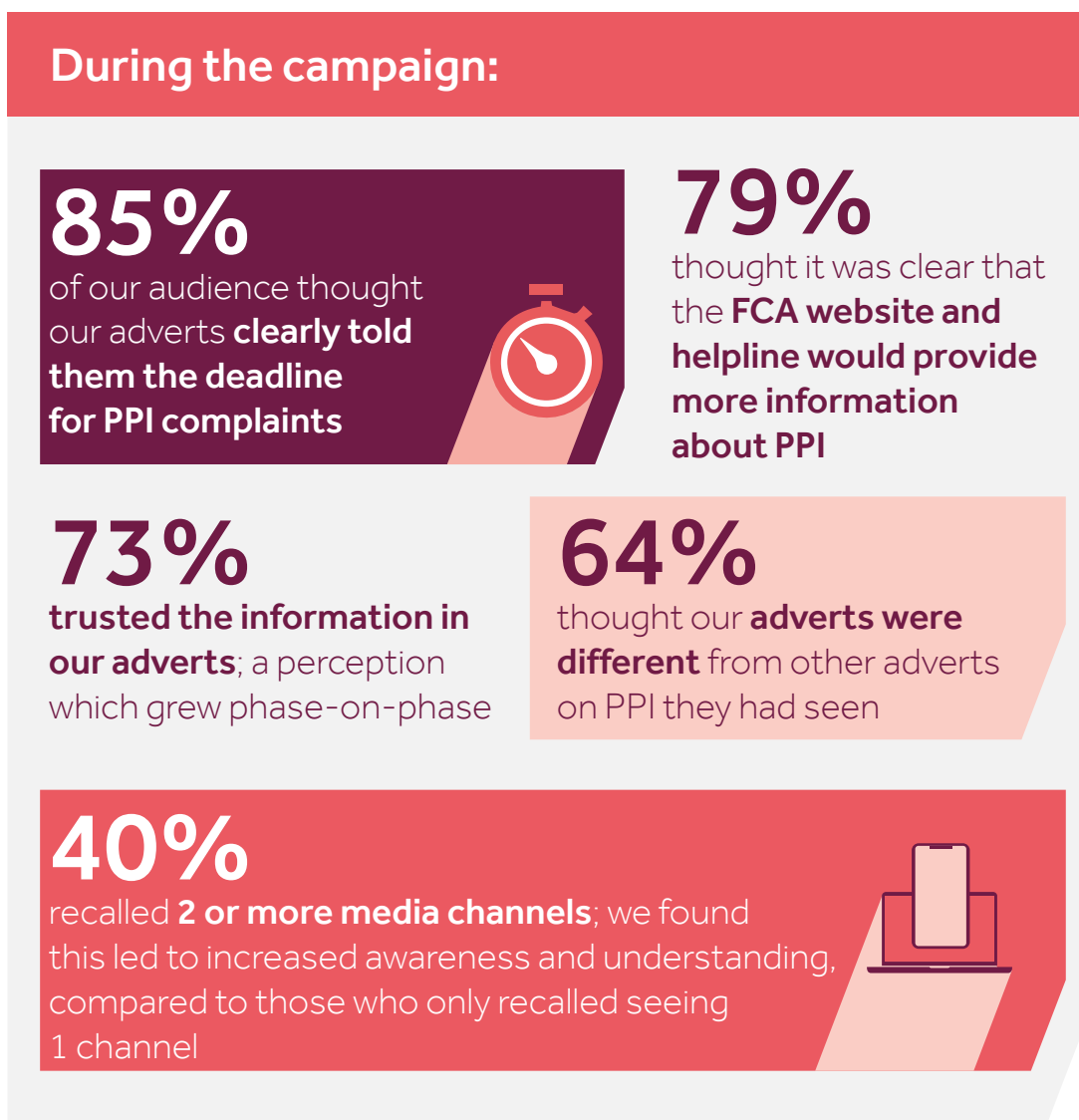
- 3.11** Advertising was used to deliver mass reach of our audience, communicating simple priority messages and a clear call to action to visit our website or call our helpline for more information. We used broadcast channels such as TV, out of home (eg billboards) and digital advertising.

We reached **99.9%** of our audience a total of **49 times**, exceeding the media target we set before the campaign of **96%**.



- 3.12** Our advertising was recognised by over 32 million people in the two-year period. The campaign was recalled by known PPI holders, those who didn't know if they had PPI, as well as those who knew they had never had a PPI policy.
- 3.13** Unprompted recognition of our advertising reached 32% of all adults by the end of the campaign. This is an exceptionally high level that exceeded our independent research agency's benchmarks (taken from comparable campaigns) by 12 percentage points.
- 3.14** Prompted recognition peaked in April 2018 (Phase 2) at 73% of all adults when we introduced messaging about eligibility targeted at those who didn't know if they had PPI. By raising awareness of the credit products PPI was sold alongside, and explaining how to check, we engaged new audiences and prompted them to make a decision about whether PPI was relevant for them.

3.15



Public Relations

3.16 Pre-campaign consumer research told us that if our audience heard about the PPI deadline in the news, as well as in our advertising, then the communications would be more effective at prompting action. However, in doing PR, we faced a clear challenge. If we talked about PPI in the way it was covered by press before August 2017, in the personal finance, money and business pages only, we wouldn't reach all of our intended audience. So we developed a deliberate strategy to propel PPI into consumer and specialist media channels.

3.17 Using innovative PR enabled us to present different facets of our PPI messaging that were less suited to advertising channels. We also used PR to communicate lessons from consumer research and extend our reach through celebrity influencers. Across the 2-year period, we made 6 PR launches, achieving over 1,000 pieces of coverage across national and regional TV, radio, print and online formats.

Partnerships

3.18 Partnerships enabled us to extend our campaign reach to those audiences that were harder to engage through mainstream channels.

3.19 Throughout the campaign, 34 partners supported us in reaching audiences with protected characteristics, those in vulnerable groups, or those who were harder to reach. Partnership support included social media activity, leaflet distribution, staff training and sharing campaign content via websites and newsletters. This means of communication boosted the trust and relevance of our message and we estimate that we reached over 1 million people during each phase of the campaign.

3.20 We would like to thank our partners for their valuable support during the campaign (see Annex G).

Community outreach programme

3.21 During Phase 4 of our advertising, we used the expertise of an independent communications expert, Multicultural Marketing Consultancy (MMC), to carry out more localised activity aimed at reaching Black, Asian and minority ethnic (BAME) communities. This approach allowed us to provide our audience with face-to-face contact. This was an effective way to break down language barriers and give complex information about an unfamiliar subject.

3.22 The programme was led by a team of ambassadors who were native speakers of 8 languages. They visited 21 locations in cities including London, Cardiff, Glasgow and Birmingham, building rapport with local communities and using spaces such as places of worship, community centres, hairdressers, retailers and ethnic supermarkets.

3.23 They visited **1,263 places in total**, of which 80% agreed to distribute or display materials (translated leaflets, posters and wallet cards). This exceeded MMC's expected take up rate by 10 percentage points.



PPI Website

3.24 Advertising, PR, partnerships and community outreach channels all signposted consumers to our dedicated website and helpline. There, our audience could find everything they needed to know about PPI, with a user journey that mirrored the checking and complaining processes that many providers had put in place.

3.25 The website housed:

- Information in 9 languages: English, Welsh, Bengali, Chinese, Gujarati, Polish, Punjabi, Somali, Urdu
- animated explainer videos on what PPI is, how to check for PPI, and how to complain about PPI
- a comprehensive 'Search for a Provider' tool – a searchable list of over 200 banks and other providers' details, including web links, contact details and postal addresses
- PPI complaints deadline leaflets, including language translated, EasyRead, British Sign Language (BSL) and audio versions
- an accessibility tool, which included audio read-out, text size, colour and definition functionalities
- an online webchat service available during the same hours as the phone helpline

3.26 Customer satisfaction with our website was high:

- **81%** of those who left feedback found the information on our website useful.
- Of these, over **11,000 people left comments**. The majority said the information was clear and concise, and that they found the list of providers' contact details particularly helpful.



PPI helpline

3.27 The dedicated helpline provided information and support to consumers on all their PPI related queries. The helpline was scalable and agile, meeting the increased demand created by the 4 advertising phases. This flexibility included extending operating hours into evenings and weekends during peak periods.

3.28 Throughout, the helpline provided a constant flow of intelligence which informed our campaign and our supervisory approach. We rang back callers to get their views on the complaints process, and our supervision team fed these insights back into conversations with firms.

3.29 The helpline team received extensive training, including on how to identify and support vulnerable groups. During the campaign, 2% of consumers requested adapted services or adjusted formats. We offered:

- Access to our services through several channels including telephone, webchat, letter, adapted formats and in foreign languages through a translation service.
- A partnership arrangement with Citizen's Advice (CA). CA provided face to face support to vulnerable consumers who needed help to complete forms or contact firms. Demand was lower than expected, but 34 face to face meetings were conducted in local CA offices, and 6 visits to consumers' homes.
- The facility to transfer consumers to their firms, and to organisations that were best placed to help consumers given their circumstances, such as the Ombudsman Service, Age UK and the Samaritans.

3.30

Consumer satisfaction with the helpline remained high over the course of the campaign, with an average score of **96%**.



PPI social media support

3.31 We used social media as an additional customer service channel, serving a similar function to the helpline. We shared information and campaign assets, such as animation videos and infographics, prompting conversation and engagement. This activity allowed us to answer consumer queries, correct any mis-information in consumer comments and signpost those who needed further information through to our website.

Campaign results

3.32 As outlined above, each individual channel contributed to delivering our objectives. We successfully increased performance on our key performance indicators (KPIs) compared to pre-campaign levels.

3.33 Our KPIs were divided into primary and secondary:

- **primary KPIs** measured the extent to which we delivered our priority objectives (messages that were most relevant to the entire audience and could be appropriately communicated via advertising channels)
- **secondary KPIs** measured our remaining objectives that involved more complex and nuanced messages, and so were not communicated in advertising but more appropriately within our owned channels (eg our website and helpline).

Primary KPIs

3.34 We give our results in the table and dashboard below. The table outlines the KPIs achieved compared to pre-campaign levels, as measured by the consumer tracking research.

Primary KPI	Pre-campaign	KPI achieved
Deadline awareness	53%	71%
<ul style="list-style-type: none"> • Aware deadline is 2019 	6%	45%
<ul style="list-style-type: none"> • Aware deadline is Aug 2019 	0%	41%
<ul style="list-style-type: none"> • Aware deadline is 29 Aug 2019 	0%	21%
Understanding of PPI	75%	82%
Understanding of how to check for PPI	73%	79%
Understanding of how to complain	42%	47%
Volume of help provided		
<ul style="list-style-type: none"> • Web users 		6,219,686
<ul style="list-style-type: none"> • Helpline calls 		114,044

3.35 The dashboard includes detail on:

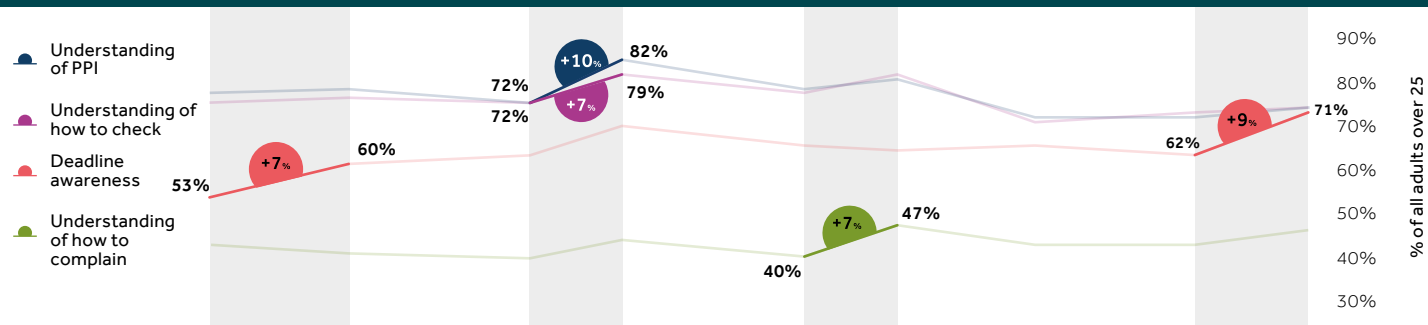
- consumer tracking research trends over the two-year campaign
- response to our website and helpline, and
- webpage views of pages with information related to each of our primary KPIs

3.36 The dashboard allowed us to look at the fuller picture of consumers' **claimed** levels of awareness and understanding (via the consumer tracking research) and their actual **actions** (response to our website and helpline).

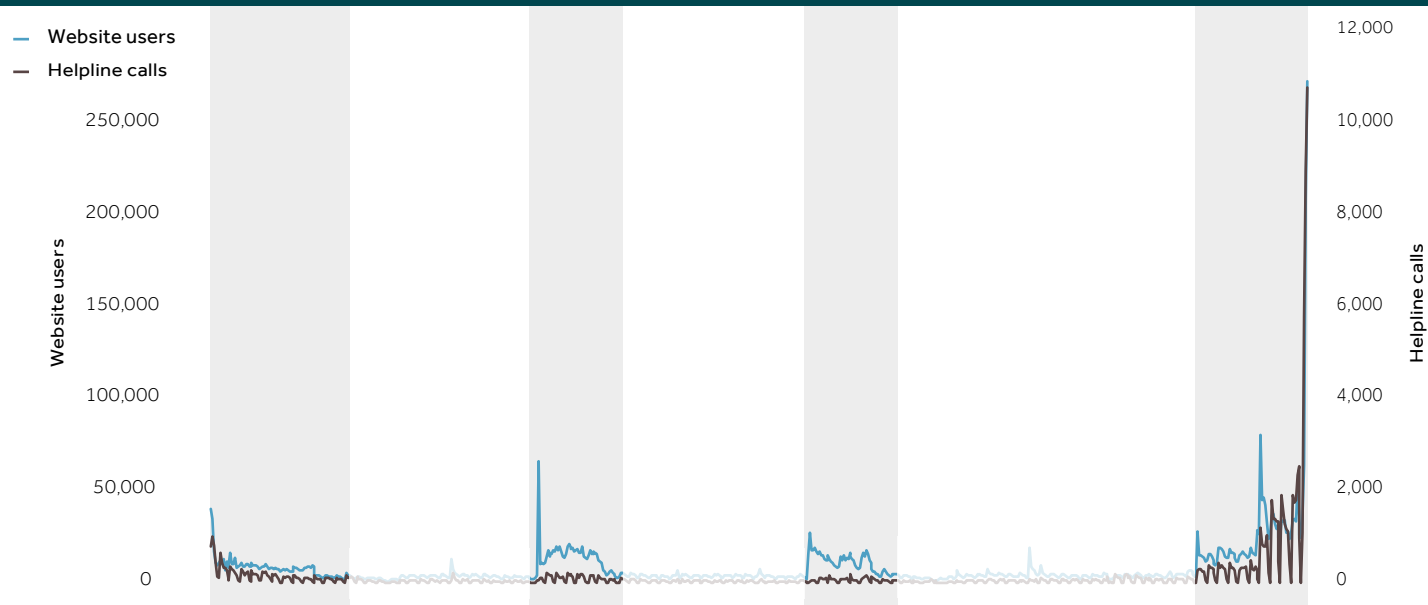
Campaign Results: Key Performance Indicators (KPIs)

	Phase 1	Phase 2	Phase 3	Phase 4
	Aug – Nov 17	April – May 18	Oct – Nov 18	June – Aug 19
Messaging focus:	Deadline awareness	Understanding of PPI Understanding of how to check	Understanding of how to complain	Deadline awareness

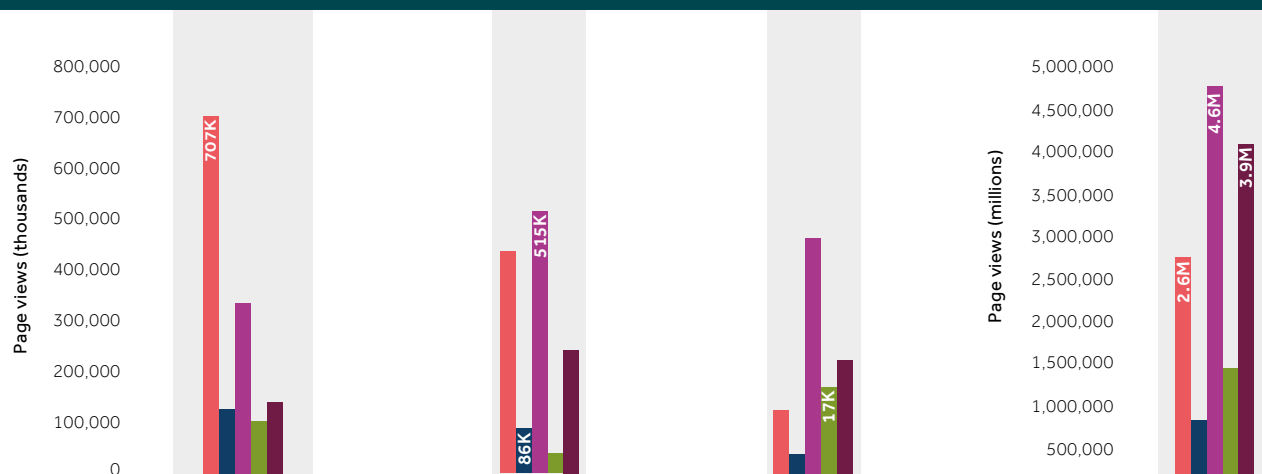
Consumer tracking research



Campaign response (website users and helpline calls)



Key webpage views



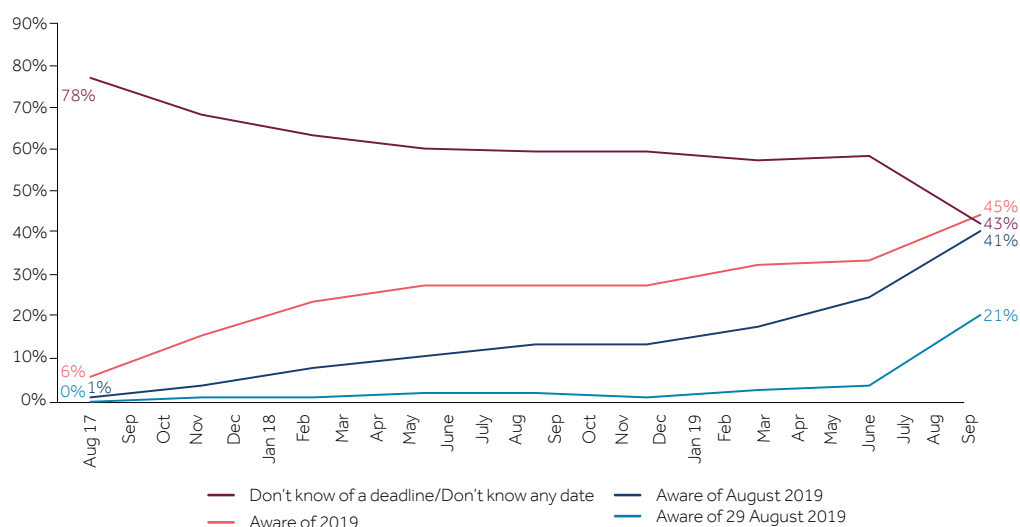
Data shows the number of page views on various web pages with information on:

■ Homepage
 ■ Understanding of PPI
 ■ Understanding of how to check
 ■ Understanding of how to complain
 ■ Search for a provider

Deadline awareness

- 3.37** Our priority objective was to raise awareness of the PPI complaints deadline. So the deadline date featured prominently across all channels throughout the 2-year campaign. We dedicated 2 phases of advertising to the deadline message. In Phase 1 we introduced the PPI deadline and saw awareness increase by 7 percentage points. In Phase 4 we emphasised the imminence of the 29 August 2019 deadline and saw awareness increase by 9 percentage points. The total KPI uplift achieved was 18 percentage points from 53% to 71% of all adults.
- 3.38** As context, we note that our pre-campaign starting point was already substantially inflated in the months preceding the 29 August 2017 campaign launch. In November 2016, after 2 consultation papers but before we set the deadline, 29% of all adults were already aware of a deadline. News and advertising publicising the now confirmed deadline occurred throughout H1 2017, making a significant proportion of our audience aware of its existence before the campaign even began.
- 3.39** We know that the PPI deadline was not relevant to all adults and so we have also looked at the KPI achieved amongst our 'engaged' audience. To do this, we removed the 65% of all adults who were certain that they never had a PPI policy. This analysis showed that 86% of the remaining engaged audience were aware of the deadline by the end of our campaign. Interestingly, most of this 86% were already aware of the deadline after Phase 1, when awareness increased by 24 percentage points, from 57% to 81%. This helps to explain the limited further increase in the later phases.
- 3.40** A very different trend occurred with awareness of the actual deadline date – see chart 3.1 below. Despite 53% of all adults being aware of the deadline in August 2017, no one could name the date of 29 August 2019. Awareness of the date built very gradually over the course of the campaign, but then increased significantly in the final months.

Chart 3.1 PPI deadline date awareness



Understanding of PPI

- 3.41** In Phase 2, we went on to inform people about which credit products PPI could have been sold alongside. This message proved very successful in helping those who didn't think they had PPI, or were not sure, to work out if they may have had it. We saw understanding of PPI increase by 10 percentage points, taking our KPI to a campaign

peak of 82% of all adults saying they knew enough about PPI. Our 'PPI explained' webpage, which explained everything a consumer needed to know about PPI, was visited over 660,000 times during the campaign.

Understanding of how to check for PPI

- 3.42** Our initial research identified the need for information on how to check for PPI to be a prominent part of the campaign. We learnt that a significant proportion of our audience did not know if they had PPI, and for them the first step was to check, before moving on to considering a potential complaint. We told industry this and worked with PPI providers to differentiate their checking and complaining processes and align these with our messaging.
- 3.43** Understanding of how to check for PPI was a consistently important message for our audience. We saw engagement with PPI checking across the entire campaign and witnessed the largest KPI uplift in Phase 2, when we included this message in our advertising. Understanding of how to check for PPI increased by 7 percentage points, and the 'How to check' webpage was visited over 515,000 times during Phase 2 alone. The KPI achieved was 79% of all adults knowing how to check.

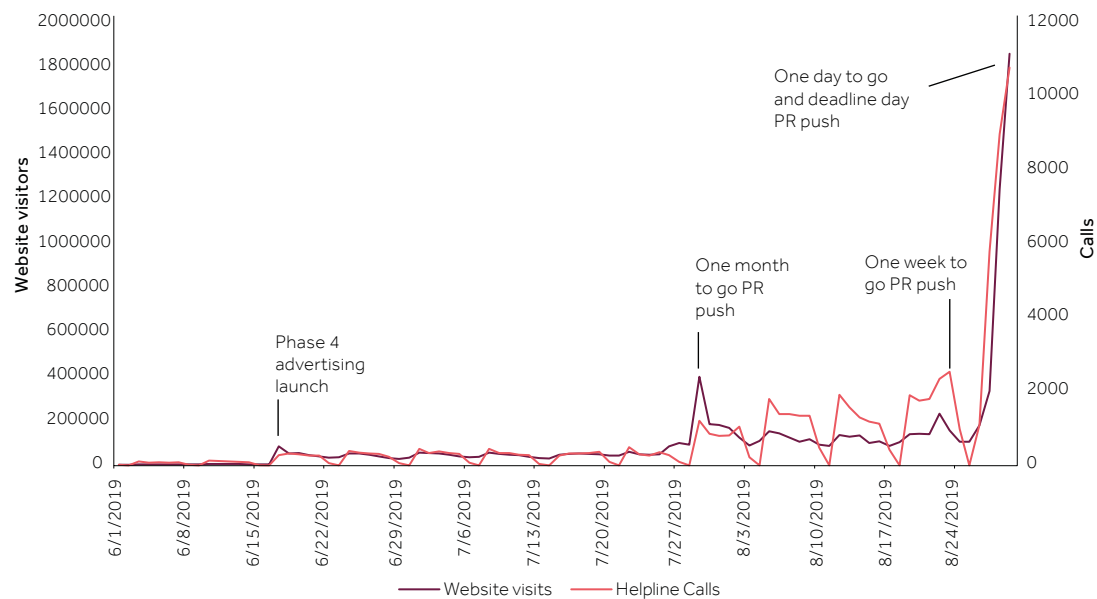
Understanding of how to complain

- 3.44** In Phase 3, we focused on explaining how to complain about PPI, and understanding increased by 7 percentage points to 47% of all adults. Our 'How to complain' webpage was also visited over 172,000 times during Phase 3; a 354% increase on the previous phase.
- 3.45** This KPI trended lower than others. We believe that was for the following reasons:
- A proportion of those who checked for PPI will have been told by their providers that they were in fact not sold a policy and so would have had no reason to progress along the journey to complaining.
 - Although 'complaint' is the term used in the FCA's rules that apply to firms, when it comes to seeking PPI redress, most consumers are not familiar, and do not agree, with the term's association with PPI. Other advertisers had been speaking to our audience for many years before our campaign. They used the term 'claim' (including 'check whether you can claim'). We explored this further in qualitative research, both before and during the campaign, and our audience explained that there were negative connotations associated with the word 'complain'. They did not see seeking PPI redress as a complaint against their provider, but instead as a 'claim back' of money they felt they were owed.

Volume of help provided

- 3.46** Between 29 August 2017 and 29 August 2019, we provided information and offered help to 6,219,686 people via our website and 114,044 via our helpline.
- 3.47** The KPI dashboard shows how response levels aligned with campaign activity, showing a clear relationship between the two. When a new phase of advertising came on air, we saw the web response increase by 405% and helpline calls by 180% on average.
- 3.48** PR activity also consistently led to spikes in traffic to our website and helpline. Chart 3.2 shows the 4 PR launches delivered during the final phase. The launches were aligned to key milestones in the run-up to the deadline, reminding our audience of the time remaining, and amplifying the steady growth in response.

Chart 3.2 Phase 4 PR activity drove response



3.49 Our aim was to provide help to the entire population, should they require it. We regularly monitored the demographics of those who visited our website or contacted our helpline and found that:

- response was split across the 4 home nations, and mirrored population levels
- website users were broadly split across all age groups
- those who called the helpline tended to be older
- 53% of those who visited our website were male and 47% female, while 47% of those who called our helpline were male and 53% female

3.50 The above analysis gives us confidence that, as reported in the campaign effectiveness section, we reached a broad section of our audience and that no major demographic profiles were less likely than others to have responded to our campaign.

The surge in response

3.51 We conducted consumer research, applied behavioural economics theories, and reviewed case studies, to shape our campaign planning and help make response patterns forecasts. All this pointed towards a likely sizable surge in the run up to the deadline, despite the already significant earlier volumes during each preceding phase. However, the actual numbers in the final period far exceeded our expectations:

- Response started to build throughout Phase 4. 60% of total helpline contacts and 36% of web traffic occurred between 17 June 2019 and 29 August 2019.
- The helpline received the same volume of calls in the final month as in the rest of the campaign combined (23 months).
- On 29 August 2019, there were 1.86 million webpage views (out of a total campaign count of 21 million) and 14,500 calls (10% of the 2-year total in just one day).

Secondary Key Performance Indicators (KPIs)

3.52 Our secondary KPIs related to mis-selling, and to undisclosed high commission earned by a provider (the Plevin case). Our aim for these KPIs was to provide information on these topics to all those who wanted it and reduce, by the end of the campaign, the number of people who felt they needed to know more.

3.53 We decided that due to the more complex and nuanced messaging these issues required, we would deliver them through communication channels that provide more space and scope than traditional advertising channels. These included:

- website
- 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 by partner organisations

3.54 For these KPIs, we monitored data from the national tracking survey, as well as visits to relevant web pages and the number of calls asking questions relevant to mis-selling and Plevin. We also reviewed levels of interest and engagement in both subjects through paid search (ie Google AdWords).

Understanding of mis-selling

3.55 Our tracking survey indicated that the percentage of people who wanted to know more about mis-selling post-campaign was only 9%, a decrease from 11% pre-campaign. The corresponding webpage had 426,292 pageviews by the end of the campaign and our contact centre received 635 enquiries specifically about mis-selling.

Understanding of high commission earned by PPI providers (Plevin)

3.56 Only 5% of our audience wanted to know more about high commission (Plevin) post-campaign, a significant decrease from 17% pre-campaign. The corresponding webpage had 149,877 pageviews in total and there were 1,049 enquiries to our call centre specifically about high commission.

3.57 For 92% of 'Plevin' Google searches, links to the FCA website appeared within the top 3 results, providing users with authoritative, impartial information on the subject. Finally, our analysis of relevant press coverage identified 39 mentions of 'Plevin' in the media across the 2-year campaign period, in titles such as The Daily Telegraph, The Daily Mirror, The Sun Online and The Guardian.

Understanding what action needs to be taken before the deadline

3.58 This KPI was originally intended to monitor consumers' understanding that there were 2 steps for consumers to complete ahead of the deadline: 1) to check for PPI and 2) complain to their provider, should they want to.

3.59 In our progress report of October 2018, we reported a decrease in understanding of what action needed to be taken before the deadline – ie fewer people thought you needed to complain ahead of the deadline and more people thought you only needed

to have checked for PPI. This fall made sense, given that we had only communicated how to check for PPI in both year 1 advertising phases.

3.60 As mentioned previously, 'complaint' is the term used in the FCA's rules. When we introduced the term in Phase 3, we did see a increase in understanding of the need 'to complain' ahead of the deadline.

3.61 When planning for burst 4, we identified that there was less need to continue communicating this message, for the following reasons:

- In June 2019, most PPI providers changed their process so as to automatically convert all positive checks into complaints.
- Throughout the 2-year campaign, we had worked with providers to ensure their communications with their customers guided them through the PPI checking process and to making a complaint, should they wish to.
- The term 'check' was consistently effective for engaging our audience and prompting action. 'How to check for PPI' was the most visited webpage and the most common reason for calls to the helpline.

Reaching and engaging protected and vulnerable groups

3.62 A core part of the campaign was to reach and engage consumers who are part of the protected and vulnerable groups our Equality Impact Assessment (EIA) identified. In doing so, we considered their needs across all our communications, including:

- advertising creative
- leaflets and posters
- website and helpline
- media buying
- press coverage/PR
- partnerships
- community outreach
- social media
- consumer tracking research

3.63 Annex C is our final Equality Impact Assessment, including details on the communications listed above. We report that all the commitments we made in March 2017 and the 2018 Progress Report were delivered.

Campaign improvements and value for money

3.64 In Annex H we explain how we ensured the campaign delivered value for money and include a breakdown of the budget.

4 Our supervision

4.1 This chapter reviews key aspects of our supervisory work since October 2018.

Accessibility of PPI processes, including for vulnerable consumers

4.2 In October 2018, we reported that firms had, among other things, improved:

- the way they presented key information on their PPI websites, including about their various and sometimes historic sub-brands
- the accessibility and ease of use of the PPI checking enquiry and complaints processes, for example by providing an online checking enquiry facility
- their PPI information and help for vulnerable consumers, including providing reasonable adjustments to information formats

4.3 Subsequently, one of our key supervisory aims was ensuring that firms maintained and further improved the accessibility of their checking enquiry and complaints services, particularly for vulnerable consumers.

4.4 During the first half of 2018 we conducted intensive review work with larger firms on their approach to vulnerable consumers and PPI. We found that:

- most were providing reasonable levels of support for consumers with visual or hearing impairments, and
- there was no indication that consumers firms had identified as vulnerable had a worse complaint outcome than complainants in general

4.5 However, we gave each firm both:

- specific feedback from our assessment on areas where we felt it could improve, and
- common feedback, for example the importance of mapping and auditing customers' experience of the process to ensure vulnerable customers didn't face obstacles that could cause them to drop out or be disadvantaged

4.6 Overall, these firms accepted this feedback positively, and individually committed to making various improvements to their approach. We checked their progress, and they delivered on these commitments through winter 2018/19.

4.7 One element of their improvements was directed at consumers themselves, including:

- making online PPI complaint and checking enquiry forms easier to use with assistive technology, such as screen readers
- reviewing landing pages and online forms, revising language, font size and appearance
- developing (with input from external experts and users) 'Easy Read' materials on PPI, and linking to these on the website
- updating website accessibility pages to include more detail on available PPI information and correspondence in other print formats, and translation services

- improving signposting to support on messaging for incoming calls
- adding an 'extra help' insert into PPI enquiry and complaint acknowledgement letters, which explained the different ways the firm could help
- updating the PPI online and paper forms to capture any additional help or requirements customers might need or have
- revising the PPI questionnaire's readability to help customers with low literacy skills complete it, improving and simplifying the language
- adding a number to call to all PPI correspondence, and an encouragement to consumers to visit a branch if they were in difficulty or needed help

4.8 The firms also improved their systems and controls to increase their ability to identify and help vulnerable consumers, as well as track and quality assure their journeys and eventual outcomes. See Annex D for details.

4.9 We ended our workstream on vulnerable customers in March 2019. We were satisfied that firms were delivering improved support for vulnerable consumers who wanted to make a checking enquiry or complaint about PPI in the run up to the deadline.

4.10 Since the deadline, we have worked with firms to ensure that:

- given the large volumes and handling delays, they remain alert to consumers in vulnerable circumstances, including financial difficulties, and consider the appropriateness of handling their complaints sooner on a case-by-case basis
- they take appropriate account of vulnerabilities when assessing post-deadline complaints for exceptional circumstances (though we do not assume that all, or even most, circumstances involving vulnerability amount to exceptional circumstances)

Fair handling of checking enquiries and complaints

4.11 A second supervisory aim after October 2018 was ensuring that firms continued fair, accurate handling of consumers' checking enquiries and complaints, and corrected any areas where we identified shortcomings.

4.12 We closely monitored the PPI complaints data that firms provided each month, and continued to gather and assess intelligence from consumers, CMCs and others about firms' handling of checking enquiries and complaints.

4.13 We communicated with firms about over 200 pieces of intelligence. We asked them to explain their response to the problems raised and, if we were not satisfied, to correct the problem and, where appropriate, provide remedies for its past impact.

4.14 These discussions led some firms to take various corrective or remedial actions in aspects of their operations or for specific limited groups of enquiries or complaints.

4.15 Overall, however, our assessment was that firms were continuing to run thorough and well-resourced processes that were delivering accurate checking for PPI and fair, consistent complaint decisions.

Firms' preparedness for the deadline

- 4.16** From early 2019, a third supervisory focus was ensuring that firms were well-prepared to deal effectively with the even larger number of enquiries and complaints that seemed likely to be made close to the deadline.
- 4.17** To monitor firms' preparations ahead of the deadline, we made regular operational calls. We assessed the information they provided on the volumes they were receiving and handling each month. We monitored the pace of their performance and the adequacy of their resourcing, challenging them where needed.
- 4.18** The combination of our campaign prompting consumers to act, and our work with firms making it easier for consumers to act, seemed to lead to further increases in both checking enquiries and complaints.
- 4.19** As volumes began rising sharply in early 2019, most firms began recruiting extra staff and making other improvements to their handling capacity. This enabled them to continue giving final responses within 8 weeks to over 90% of the growing number of complaints, and swift responses to most of the growing number of enquiries.
- 4.20** Through our operational engagement, we also checked that, by mid-2019, firms had made reasoned assumptions about potential further volume growth in the run-up to the deadline. We also checked that they had reasonable resourcing and operational plans in place to deal with this, including contingency plans.
- 4.21** However, we recognised that neither we nor firms could accurately predict the volumes that might come in close to the deadline. Our view was that, from the perspective of our 2017 package of measures and its aims, the priority was prompting consumer action and ensuring consumer access to the checking and complaints process, even if that meant greater subsequent pressure on the timeliness of firms' handling.

Protecting consumers who acted close to the deadline

- 4.22** A fourth supervisory aim was to ensure that consumers who acted close to the deadline, particularly by making a checking enquiry then, were not disadvantaged.
- 4.23** We pursued this mainly by working through the trade bodies of banks and other PPI firms on the one hand, and those of CMCs on the other. With them, we discussed:
- The position of consumers who might make checking enquiries in the run up to the deadline. We particularly focused on the risk that they might be disadvantaged (because they would have little or no time to make a complaint before the deadline in response to a positive answer to their checking enquiry).
 - The potential benefits of arranging things so that firms' well-established PPI-checking enquiry processes could continue right up to the deadline, rather than CMCs feeling obliged to switch, long before, to submitting complaints for consumers who might or might not have had PPI. That would have been a less efficient process for both CMCs and firms.

- 4.24** Over several meetings with the trade bodies, we helped to evolve the auto-conversion approach (described at para 2.10 above) that would address these aspects and which proved acceptable to most PPI firms and CMCs.
- 4.25** Some firms instead allowed consumers who made checking enquiries close to the deadline to complain within 2 or 3 months of being told that they had had PPI, even if that meant the complaint was made after the deadline (which these firms then waived).

Smaller firms

- 4.26** A fifth area of focus was increasing our supervisory engagement with a number of smaller firms (in PPI terms), who together receive around 10% of all PPI complaints.
- 4.27** In early 2019, we wrote to these firms with our view of good practice on checking enquiries. We noted the commitments larger firms had made to accessible processes, support for vulnerable consumers, and consumer friendly approaches to the deadline period. We asked these smaller firms to tell us how their own PPI processes compared.
- 4.28** After an initial assessment of their responses, we held follow-up calls where we asked these firms for further detail or challenged them on aspects of their approach. The results were largely positive, and by June 2019 we felt assured that these smaller firms too:
- had accessible, well designed PPI processes that weren't placing obstacles (such as excessive prior information demands) in the way of consumers seeking to use them
 - were offering reasonable alternative formats (eg Braille, or larger font) when needed
 - had checking enquiry and complaint-handling processes that were mainly delivering prompt, accurate and fair answers
 - had prepared themselves appropriately for the final run-up to the deadline
- 4.29** Our work also resulted in these smaller firms making various commitments, including:
- making changes to their website content to include more bespoke PPI information
 - doing more to identify and support vulnerable consumers wanting to check or complain
 - agreeing to include information about the deadline, and how to complain, when confirming that customers had held PPI
 - adopting auto-conversion (or an equivalent flexible approach) for checking enquiries made after 29 June; some also began sending proactive reminders to consumers who had previously received a positive outcome to their checking enquiry but not yet made a complaint
 - agreeing to extend phonline opening hours on deadline day, and to take a pragmatic approach to postal complaints arriving after the deadline
 - ensuring no consumers would be disadvantaged if they were prevented from complaining in time due to failings in the firm's systems
- 4.30** For the hundreds of very small firms whom we had not engaged with directly, we twice used the FCA's Regulatory Round Up update (sent to all regulated firms), in March and June 2019. We invited these firms to make certain key commitments such as clearly referring to the PPI deadline when they confirmed customers had held PPI, and taking a pragmatic approach to the deadline period (including for postal complaints).

Firms' additional Plevin mailing

- 4.31** In March and April 2019, following our new rules and guidance, firms wrote to 160,000 previously rejected mis-selling complainants (who had mostly had certain kinds of regular premium PPI policies). These letters explained that these complainants could make a new complaint in light of undisclosed commission and should consider doing so before the deadline. This mailing supplemented the 1.3m similar letters firms had sent to other previously rejected complainants in late 2017.
- 4.32** The response rate to this mailing was around 27%. As for the campaign generally, we view an informed decision by the consumer not to complain as a valid outcome. Nonetheless, given behavioural research on the effect of previous consumer contact exercises, this response rate is not very different from those other exercises, taking into account the relative redress levels and financial sophistication of the consumers involved. Some firms also chose simply to pay redress directly to small numbers of relevant consumers, rather than first inviting them to make a new complaint.

Our supervision on and after the deadline

- 4.33** Because of the very heavy consumer traffic around the deadline, some firms did experience service problems or unavailability in some channels for short periods during 27-29 August 2019. However, with our encouragement, these firms adopted sensible mitigating measures to ensure no one was disadvantaged, including, variously:
- redirecting consumers to their other available channels
 - calling back and/or texting those consumers who abandoned calls, where they could identify them
 - announcing that they were extending their deadline to the evening of 30 August
 - announcing that consumers who had been unable to complain in time because of the problems should submit a complaint explaining this, which they would consider
- 4.34** In the days following, these firms received several hundred complaints alleging submission difficulties, most of which they accepted as genuine and treated as in time.
- 4.35** Despite firms' assumptions and preparations, which we had checked, the volumes received in July and August 2019 turned out to be much higher. Even with activated contingency plans, such as extra overtime and cancelled leave, these volumes significantly exceeded firms' planned capacity. So, most firms:
- had to pause handling operations to focus on logging the incoming correspondence, which meant delays in acknowledging complaints and enquiries
 - for a time, could not respond promptly to checking enquiries
 - were unable to handle complaints within 8 weeks of receipt
- 4.36** However, with our strong encouragement, firms took strategic steps to further increase their capacity significantly, including by:
- further increasing staffing, including offshore, and through internal moves, external recruitment and consultancy sources; all of this involved significant training
 - taking steps to keep existing staff, despite the growing industry-wide demand
 - expanding PPI operations into new or refurbished sites

- carefully sequencing the process and moving and re-training staff to deal with the most urgent tasks first
- investing in further automation of work flow processes (for example, speeding up identification of duplicate submissions) to increase productivity
- no longer investigating certain groups of complaints where uphold rates were already very high, automatically upholding and redressing them instead

4.37 These steps helped bring forward firms' planned dates for completing most PPI complaints to summer 2020.

4.38 We have been holding regular calls with firms about their progress against their plans.

4.39 Our supervisors will continue to monitor firms' progress, to ensure that they complete their PPI complaint handling fairly. We will continue to assess and act on any intelligence we receive that suggests problems with the quality of firms' handling of the remaining complaints.

Official Receiver cases

4.40 In spring 2019, the Official Receiver (OR) began submitting a large number of PPI enquiries to firms for individuals who had been declared bankrupt. The OR asked firms to check if the named individuals had ever had PPI and, if so, to regard the case as a complaint and assess if any redress for a mis-sale, or for unfair credit relationships due to undisclosed high commission, was due.

4.41 The OR's submissions added to firms' operational concerns about the wider volumes that flowed in before the deadline. Given those concerns, the OR engaged with firms and in most cases agreed that they can deal with its submissions after they have answered those from consumers and CMCs.

Cases submitted by estate trustees concerning the deceased

4.42 Throughout our campaign, we ensured that information was available for trustees on behalf of estates of the deceased: We:

- developed and published specific information on our website
- invested in search engine optimisation to ensure anyone searching for terms related to estates of deceased consumers could access our guidance in their search results
- provided relevant information to fully trained contact centre staff and social media community managers, so that they could respond to consumer queries about estates of deceased consumers through our dedicated helpline and social media channels

4.43 Firms received 680,000 submissions from trustees on behalf of estates of the deceased. Firms are checking these for past PPI policies and treating them as complaints where PPI is found.

Our supervision of CMCs

- 4.44** We took over responsibility for regulating CMCs from the Claims Management Regulator in April 2019. CMCs were required to register for Temporary Permission to continue to provide claims management services before applying to us for full authorisation.
- 4.45** We received 274 applications from CMCs operating in the financial services claim sector that had Temporary Permission. The majority of those 274 CMCs are providing PPI claims services. From 1 April 2019, CMCs were also required to comply with a new set of conduct rules we introduced.
- 4.46** As part of our effort to ensure orderliness around the PPI deadline, we wrote to CMCs in June 2019. We:
- noted that there had been an increase in the proportion of checking enquiries where there was no relationship between their customer and the financial service provider receiving the claim, or where CMCs were acting for their customers without appropriate consent or completed letters of authority
 - reminded CMCs of our various requirements and expectations, including that claims must have a good basis and that CMCs should investigate the existence and merits of each element of a potential claim
- 4.47** Following the publication of the letter, and in the lead up to the PPI deadline, we still had concerns about the quality of CMCs' checking enquiries, particularly around the high proportion of cases where:
- there were deficiencies in letters authorising the CMC to make an enquiry
 - the enquiry was a duplicate of a previous enquiry that had been answered
 - the check revealed there had been no consumer/firm relationship at all
 - the check revealed there had been a relationship, but no PPI
- 4.48** After the deadline, we wrote to all CMCs again, this time setting out our view (shared by the Ombudsman Service) that, given the very high volumes, they should support the orderly resolution of PPI complaints by giving firms reasonable time and opportunity to handle them. We also reminded them of their existing obligations.
- 4.49** Most CMCs have responded reasonably and responsibly in this respect so far, engaging constructively with firms over timescales.
- 4.50** We continue to closely monitor CMCs' conduct following the PPI deadline.

Annex A

Consumer tracking research methodology

1. We tracked the impact of our campaign using a mixed-methodology research approach:
 - Quarterly face-to-face surveys, in-home, self-completion computer-assisted survey. Sample size approximately 850 per wave.
 - Monthly online surveys, Computer Assisted Web Interviewing (CAWI) with the sample sourced from panels. Sample size approximately 500 per wave.
2. Both samples were nationally representative of the campaign target audience: all adults over 25 years old in UK. Samples had quotas on age and gender and across regions.
3. We used the quarterly survey for KPI measurement (unless otherwise stated). The timings of the research straddled each phase of advertising.
 - Phase 1 – Pre-waves – November 2016 and August 2017; Post wave – November 2017
 - Phase 2 – Pre-wave – February 2018; Post wave – May 2018
 - Phase 3 – Pre-wave – August 2018; Post wave – November 2018
 - Phase 4 – Pre-waves – Feb 2019 and May 2019; Post wave – September 2019
4. The table below sets out the survey questions and the answers on which the statistics we use in the report were captured. Answers in **bold** represent positive responses to our questions.






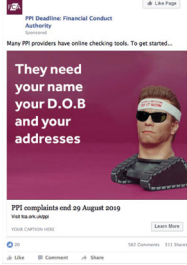

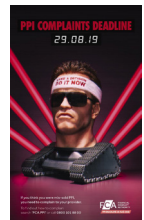




Page number	Metric/KPI	Question
4	Unprompted recognition	<p>In the last month, have you seen, heard or read any advertising, news or information in any of these places about a deadline for PPI complaints?</p> <p>We're not talking about PPI in general but specifically about a PPI deadline.</p> <ol style="list-style-type: none"> 1. TV advertisement 2. TV programme or news 3. Radio advertisement 4. Radio programme or news 5. Newspaper or magazine advertisement (including online version) 6. Newspaper or magazine article 7. Outdoor advertisement (eg billboard/poster on transport, shopping centres etc.) 8. Internet advertisement (eg banner or display) 9. Social media site (eg Facebook, Twitter, LinkedIn) 10. Elsewhere online 11. Consumer body/charity/ local or community organisation 12. Within my community (eg. places of worship, town halls, community centres, high street shops) 13. Through contact (call or text) from a Claims Management Company (CMC) 14. Information on the Financial Conduct Authority (FCA) Website 15. Told by family member/friend/colleague 16. A letter from my provider/bank/building society 17. On screen at the cinema 18. Other (please specify) 19. None of these 20. Don't know
4	Prompted recognition	<p>Have you seen this ad before?</p> <p>Have you seen any of these (or similar ads) before? Some of them might have been in an animated format.</p> <ol style="list-style-type: none"> 1. Yes 2. No 3. Don't know
4	Campaign diagnostics	<p>Now thinking about all the ads I have just shown and played to you, how much do you agree or disagree with these things that other people have said about them?</p> <p>[5 point agreement/disagreement scale; Don't know]</p> <ol style="list-style-type: none"> 1. I trust the information in these ads 2. The ads clearly told people the deadline for PPI complaints 3. It is clear from these ads that the FCA website and helpline had more information about PPI 4. These ads were different from the other ads for PPI I have seen

Page number	Metric/KPI	Question
7, 8, 9	Deadline awareness	<p>As far as you know, are there plans for a deadline on making a payment protection insurance (PPI) complaint?</p> <ol style="list-style-type: none"> 1. There definitely is/was a deadline 2. There might be a deadline 3. I don't know whether there is/was a deadline or not 4. I don't think there is/was a deadline 5. No, there is/was definitely no deadline
7, 9	Deadline date awareness	<p>When is/was the payment protection insurance (PPI) complaints deadline? If you're not sure of the exact date, please enter an estimate.</p> <p><i>PLEASE TYPE ANSWER BELOW</i></p> <p><i>Don't know</i></p>
7, 8, 10	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
7, 8, 10	Understanding of how to check for PPI	<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
7, 8, 10	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
12	Understanding of mis-selling	<p>Which of these statements best describes your need to know more about people being mis-sold payment protection insurance (PPI) policies?</p> <ol style="list-style-type: none"> 1. I know enough about people being mis-sold payment protection insurance (PPI) policies 2. I would like to know more about people being mis-sold payment protection insurance (PPI) policies 3. Don't know
12	Understanding of high commission (Plevin)	<p>Which of these statements best describes your need to know more about the new reason for making a payment protection insurance (PPI) complaint, not about mis-selling, but about commission earned by PPI providers (which is sometimes called Plevin)</p> <ol style="list-style-type: none"> 1. I know enough about commission earned by PPI providers (Plevin) 2. I would like to know more about commission earned by PPI providers (Plevin) 3. Don't know



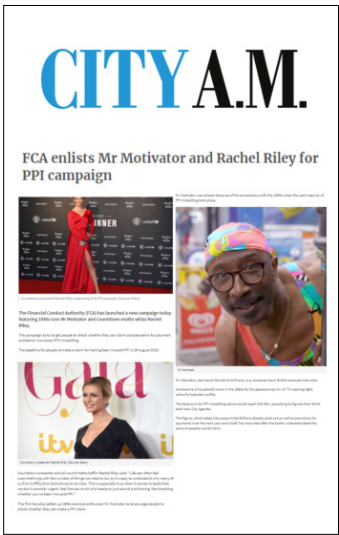

Annex B

Campaign assets (advertising imagery, PR imagery and press coverage, partnerships support, community outreach photos, campaign leaflets and posters and infographics)

4 Phases of multi-channel advertising

	TV	Out of home eg billboards	Digital
Phase 1 Aug – Nov 2017 Introduced the PPI complaints deadline and signposted to our website and helpline.			
Phase 2 Apr – May 2018 We built understanding of PPI, as well as how to check if you had a policy alongside different credit products.			
Phase 3 Oct – Nov 2018 Phase 3 continued the PPI complaints process, moving from checking to messages about PPI complaints process.			
Phase 4 June– Aug 2019 Campaign attention returned to deadline awareness ahead of the 29 August 2019.			

PR summary

	PR examples	Coverage summary
Phase 1 Deadline launch	 	<ul style="list-style-type: none"> • 114 pieces of coverage • 15 journalists attended the press conference • 140,500 pageviews on launch day alone
Phase 2 Prompting our audience to put checking for PPI on their to-do-lists, using Mr Motivator and Rachel Riley (Countdown presenter)		<ul style="list-style-type: none"> • 37 pieces of coverage • Over 60,000 pageviews to relevant webpages on PR launch day
Phase 3 Ensuring our audience had the confidence to complain should they wish to, using consumer champion, Gok Wan and confidence coach, Fred Sirieix		<ul style="list-style-type: none"> • 23 broadcast interviews, including BBC Breakfast TV and the Kay Burley show • National coverage in the Daily Express, Your Money, Daily Mirror • 58,037 pageviews to the site on PR launch day, a 28% increase on the day before

	PR examples	Coverage summary
<p>Phase 4</p> <p>Emphasise the deadline is coming with four activations across the final months, using bloggers (Skint Dad; Lottie Earns), Memory Expert Dominic O'Brian, and Alison Hammond (TV personality)</p>		<ul style="list-style-type: none"> • 1,000+ pieces of coverage • 55% of coverage was broadcast • Peaks in response to our website and helpline as shown on page 19

Partnerships support

LDE Learning Disability England shared PPI Deadline: Financial Conduct Authority's video.
29 August at 15:25 · €

The Financial Conduct Authority want to reach people with learning disabilities who might have been mis-sold PPI (Payment Protection Insurance). You can find easy read information about PPI here: <https://www.fca.org.uk/.../easyread-ppi-complaints-end-leafle...>

1,021 Views

PPI Deadline: Financial Conduct Authority
29 August at 14:43 · €

PPI complaints end on 29 August 2019. Watch and make a decision about PPI.

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rota
Race on the Agenda

OUR WORK NETWORKS & COALITIONS GET INVOLVED EVENTS & TRAINING PUBLICATIONS

PPI CAMPAIGN

MAR 29 2019

FCA FINANCIAL CONDUCT AUTHORITY
PPI DEADLINE 29 AUG 2019

Did you know that PPI was sold as far back as 1970? If you've ever taken out a loan, mortgage, credit card, store card or bought something on credit, such as a car, you may have been sold Payment Protection Insurance (PPI). If you think you have or have had PPI, you need to decide whether or not you want to complain.

There is a deadline of 29 August 2019 to complain about the sale of a PPI policy. You will not be able to complain after this date.

The Financial Conduct Authority has all the information you need to make a decision about PPI. Visit fca.org.uk/ppi/ or call 0800 101 8800

Carers Trust @CarersTrust Follow

The Financial Conduct Authority has set a deadline of 29 August 2019 to complain about the sale of a PPI policy. If you're a #carer, you could be eligible to make a claim. Visit fca.org.uk/ppi.

New reason to complain about PPI:
You can now complain about PPI if you think your bank or other provider earned a high level of commission from the sale of PPI, but didn't tell you this when you bought it.

You should consider whether you might have been sold PPI. Your provider must consider whether they earned a high level of commission, even if you didn't mention it in a complaint about the mis-selling of PPI.

If your initial PPI complaint was rejected, you can still complain about a provider earning a high level of commission.

FCA FINANCIAL CONDUCT AUTHORITY

12:00 PM - 4 Apr 2018

CAPAS @CAPAS Follow

Yes I know we're all fed up of hearing about PPI (!) but the deadline for claiming back money for mis-sold #PPI is VERY SOON! Visit bit.ly/2FCA_PPI or call 0800 101 88 00 now.

FCA FINANCIAL CONDUCT AUTHORITY

British Deaf Assoc @BDA_Deaf Follow

Have you checked if you have had #PPI? See BSL video: bit.ly/FCA-PPI-BSL Website for more information & decide: fca.org.uk/ppi/

Visit fca.org.uk/ppi/ or call 0800 101 88 00

FCA FINANCIAL CONDUCT AUTHORITY

BSL British Sign Language video is available

6:41 PM - 8 Sep 2017

2 Likes

FCA

Gingerbread @Gingerbread Follow

Did you know that the deadline for making a #PPI complaint is 29 August 2019? You can complain for free by contacting your provider directly. Find out more by calling 0800 101 88 00 or visiting @TheFCA's website: bit.ly/FCAPPI

1201 - 20 Views

Visionary @visionary_uk · Oct 18

For information about PPI in an alternative format, such as braille, visit

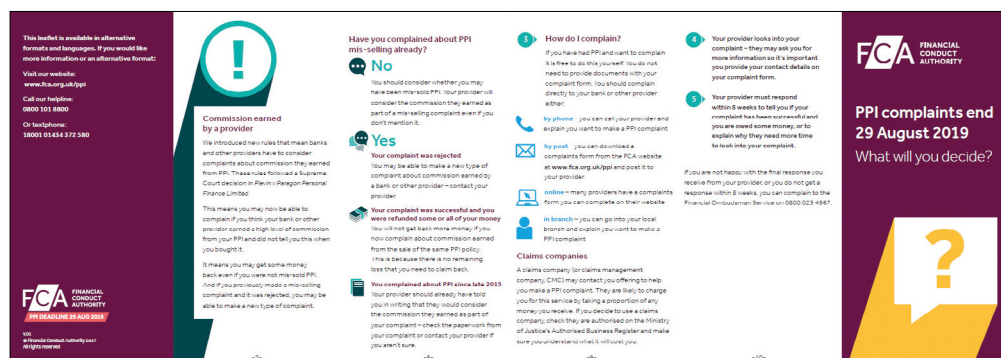
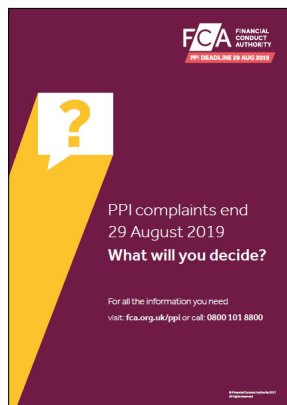
Help and support
Contact the FCA if you need help understanding more about PPI, or want information in a different format or additional language.
fca.org.uk

1 1

Community outreach programme in BAME communities



Campaign leaflets, posters and infographics



Annex C

Equality Impact Assessment (EIA)

The FCA has obligations under s.149 of the Equality Act 2010. We also consider that our consumer protection objective requires us to consider the position of vulnerable consumers.

In our Equality Impact Assessment (EIA) in Annex 2 of PS17/3, we set out our conclusions that:

- the package of measures we published in PS 17/3 could present a greater risk of adverse impacts to some protected groups and vulnerable consumers, but
- provided we took the various mitigating actions we had identified in our EIA, we would eliminate these potential disadvantages or minimise them to a level where we could be confident that it was reasonable and justified to proceed (considering the rationale for implementing the package of measures, and the fact that we did not think we could reasonably and proportionately achieve our overall aim of an orderly conclusion to the PPI issue by other means).

We have continued to assess these potential disadvantages and mitigating actions in the context of our campaign and our supervisory work.

Background:

1. 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
2. The relevant protected characteristics which we are required to consider are:
 - age
 - disability
 - gender reassignment
 - pregnancy and maternity
 - race
 - religion or belief
 - sex
 - sexual orientation
 - marriage or civil partnership status (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).

3. We also consider that our consumer protection objective requires us to consider the position of vulnerable consumers.
4. We refer to the 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 proposals had the potential to result in less favourable outcomes for some protected groups and vulnerable consumers. Specifically, we identified that there were particular reasons why belonging to certain protected or vulnerable groups might make some consumers less able to understand or less willing to act upon our proposed communications campaign. This meant there was 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.
5. The groups that our research showed might be disadvantaged by our proposals were:
 - older people (particularly those aged over 65 and even more so for those over 75)
 - women
 - Black, Asian 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
6. Given the evidence on age and cognitive impairment, we also identified a need to ensure that the campaign engaged people who care for older or disabled people.
7. We also considered the potential impact on those in, or discharged from, bankruptcy or other forms of debt relief arrangements, including Individual Voluntary Arrangements (IVAs) and Debt Relief Orders (DROs).
8. 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 minimise them to a level where we could be confident that it was reasonable and justified to proceed.
9. In this updated EIA, we can report that we have delivered all the mitigating actions that we committed to in the original EIA.
10. We also provide:
 - Detail on the additional steps we took beyond those mitigating actions to further reach and engage protected and vulnerable groups.
 - Data from our consumer tracking survey which compares campaign recognition, deadline awareness and understanding amongst protected and vulnerable groups against national average levels (nat. avg.). This data was used throughout the campaign to monitor our impact and inform ongoing campaign improvements, for example through more media targeting. The data gives an indication of how the campaign has reached and engaged these groups but should not be seen as an absolute measure of campaign effectiveness for protected and vulnerable groups. This is because we also monitored and tracked the impact of the deadline and campaign through other measures, such as management information from the FCA's PPI website and helpline, feedback from partner organisations and community outreach ambassadors, and information from firms.

Older People

11. In the original EIA, we found 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 often 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.
12. We also identified cold calling from CMCs as an issue. Any increase in cold calling as a result of the proposed 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.
13. Our discussions with the Information Commissioner's Office (ICO) have given no evidence of increased cold calling to the elderly (or others) by CMCs (or others). In fact, levels appear to have declined since the launch of the PPI campaign
14. We took the following steps, as committed to in the original EIA, in order to eliminate any disadvantages or minimise them to a level where we could be confident that it was reasonable and justified to proceed with our PPI proposals:
 - 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 (TV, posters, radio) to ensure older audiences who were less likely to use the internet had a clear route of contacting us to obtain further information about PPI. 32% of those who called our helpline were over 65 years old, and 17% of those who visited our website were over 65 years old, a similar proportion as for 55-64 year olds.
 - Launched media plans that delivered 99.95% coverage of audiences aged over 65 and over 75, reaching each person, on average, a total of 86.50 times across the four phases of advertising (with an average weekly frequency of 2.7 during on-air weeks).
 - Worked with a campaign partner, Age UK, who shared our message through its owned channels and provided consumers with adapted communications (large font formats) if required.
 - Tested the PPI website content directly with older people and/or with partners supporting older people, to ensure it was easy to understand for consumers in these age brackets who do use the internet.
 - Secured editorial coverage in non-commercial radio stations, which we knew to be a key channel for older people.
 - Designed our consumer tracking research to include a robust sample of older people.
15. According to post-campaign tracking older people were as likely to recognise the campaign as the national average (71% vs 68% nat. avg.). The research also found that older people had similar levels of deadline awareness (69% vs 71% nat. avg.), understanding of PPI (71% vs 72% nat. avg.), understanding of how to check (68% vs 72% nat. avg.) and more understanding of how to complain (58% vs 46% nat. avg.).

Women

- 16.** In PS17/3, 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.
- 17.** While our view was that the large-scale communications campaign would be effective at reaching women, we committed to implement further actions to either eliminate any disadvantages, or minimise them to a level where we could be confident that it was reasonable and justified to proceed with our PPI proposals.
- 18.** In particular, we took the following steps, as committed to in the original EIA:
- Tested advertising concepts with women, drawing out feedback from women in different age groups (including those over 65 and 75, as above). This research provided evidence that the selected concept would resonate with women.
 - Launched media plans that delivered 99.98% coverage of female audiences, reaching each person, on average, a total of 100.18 times across the 4 phases of advertising (with an average weekly frequency of 3.13 during on-air weeks).
 - Designed our consumer tracking research to include representative coverage of women.
- 19.** According to post-campaign tracking women were as likely to recognise the campaign as men (66% vs 68% nat. avg.). The research also found that women had similar deadline awareness (71% vs 71% nat. avg.), understanding of PPI (72% vs 72% nat. avg.), understanding of how to check (73% vs 72% nat. avg.) and understanding of how to complain (46% vs 46% nat. avg.).

Race

- 20.** In PS17/3, we noted that the evidence generally showed that many members of BAME groups have lower levels of financial knowledge which could impact their decision-making on PPI.
- 21.** We committed to take a number of specific steps with BAME consumers in mind to ensure any disadvantages were either eliminated or minimised to a level where we could be confident that it was reasonable and justified to proceed with our PPI proposals.
- 22.** In particular, we took the following steps, as committed to in the original EIA:
- Worked with an independent communications expert, Multicultural Marketing Consultancy (MMC), who had experience of reaching and engaging diverse BAME audiences. MMC advised us on the planning and production of the campaign.
 - 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.
 - Secured editorial coverage about PPI in key earned media channels consumed by BAME audiences, such as Asian Image and BBC Somali, and in mainstream titles which we knew were consumed by a diverse range of audiences including BAME

groups. In our final phase, we secured 8 spokespeople covering all target audiences, who participated in 14 broadcast interviews and promoted our messages on their own social media profiles. We secured over 50 pieces of coverage targeted exclusively to BAME communities.

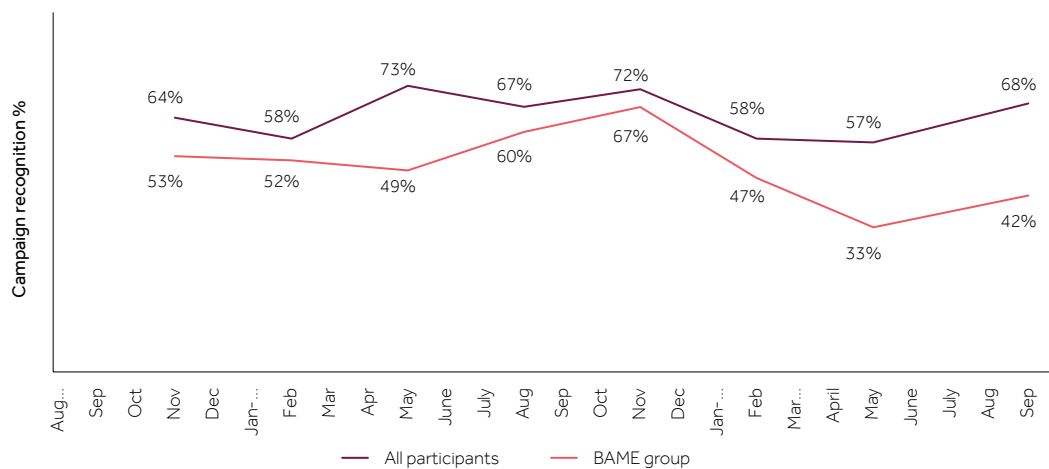
- Worked with the Chinese Information and Advisory Centre, the Confederation of Indian Organisations and Race on the Agenda to share our messaging with BAME communities.
- Launched media plans that delivered 99.94% coverage of BAME audiences, reaching each person, on average, a total of 138.47 times across the four phases of advertising (with an average weekly frequency of 4.3 during on-air weeks).
- Produced digital adverts and a campaign leaflet in 7 different languages, as recommended by MMC. The digital adverts were predominantly aired on social media networks with a total 12.9 million impressions served over the 4 phases.
- Translated our website into 7 different languages, as recommended by MMC.
- Produced information-led animation videos, housed on our website, in 5 different languages recommended by MMC, who advised that audio-visual translation requirements differ from those for visual only (eg website).
- Provided a translation service to callers requiring information in another language.
- Designed our consumer tracking research to include sufficient coverage of BAME communities.

23. In the update to the EIA we published in the PPI Deadline Progress Report in October 2018, we noted that our mid-campaign tracking research indicated that, among BAME audiences, campaign recognition, awareness of the deadline and understanding were tracking below the national average. We committed to take further steps to reach and engage this group. The additional steps we have taken are as follows:

- Implemented local grassroots activity aimed at reaching BAME communities. The community outreach programme comprised a team of ambassadors who were native speakers of 8 languages. They visited 21 locations including London, Cardiff, Glasgow and Birmingham, building rapport with local communities and engaging spaces such as places of worship, community centres, hairdressers, retailers and BAME supermarkets. We visited 1,263 touchpoints in total, and the overall take up rate for materials (translated leaflets, posters and wallet cards) was 80%. This exceeded MMC's expected take up rate by 10 percentage points.
- Used Census data to identify areas of high BAME population and bought more out-of-home advertising there.
- Shared our message on 12 different BAME radio stations, such as IBC Tamil, Sunshine Radio Yorkshire and Panjab Radio. The content included national adverts, as well as presenter live reads, (translated as recommended by the stations), which provided a more trusted, conversational tone.
- Increased our investment in social media advertising targeted at BAME audience; over half of this investment was made in Phase 4, in the run up to the deadline.

24. According to post-campaign tracking research BAME groups had lower levels of campaign recognition compared to the national average (42% vs 68% nat. avg.). The research also found that this group had relatively lower levels of deadline awareness (36% vs 71% nat. avg.), understanding of PPI (40% vs 72% nat. avg.), understanding of how to check (41% vs 72% nat. avg.) and understanding of how to complain (35% vs 46% nat. avg.).

25. The chart below shows recognition of our campaign over time:



26. By Phase 3, we had increased campaign recognition amongst BAME groups to 67%, an uplift of 14 percentage points compared to Phase 1.

27. In November 2018, we entered a 7-month off-air period between Phases 3 and 4. As we expected, recognition reduced for our entire audience; however, the drop was more significant for BAME groups. Despite BAME groups' recognition increasing by a similar margin to other participants during Phase 4 (9 percentage points and 11 percentage points respectively), there remained a final difference of 26 percentage points.

28. A similar trend was witnessed for relative levels of awareness and understanding.

Disability

29. While many people with disabilities effectively manage their day to day affairs, evidence we previously considered 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.

30. In PS17/3 we proposed to put in place a number of specific mitigations to ensure that any such disadvantages were either eliminated or minimised to a level where we could be confident that it was reasonable and justified to proceed with our PPI proposals.

31. In particular, we took the following steps, as committed to in the original EIA:

- Worked alongside an independent communications expert, BDS Communications Limited, who had experience of reaching and engaging these audiences. They advised us on planning and producing the campaign.
- Tested 4 creative concepts directly with consumers and with advocates that support the groups in respect of cognitive impairments, learning disabilities, mental health and sensory impairments. This research provided evidence that the selected concept would resonate with disabled people.
- Obtained feedback from advocates about adapted communications and effective media, which we took forward when designing campaign materials.

- Ensured that all our communication was inclusive in terms of language, formats and imagery and met appropriate accessibility standards.
- Launched media plans that delivered 99.93% coverage of disabled audiences, reaching each person, on average, a total of 88.53 times across the 4 phases of advertising (with an average weekly frequency of 2.8 times during on-air weeks).
- Used a disability video on demand (VOD) platform to best reach disabled people with our TV adverts. We delivered 330,604 impressions in Phase 4 and engagement exceeded benchmarks.
- Worked with organisations that support people with disabilities including the British Deaf Association, British Dyslexia Association, British Institute of Learning Disabilities, Learning Disability England, Mind, Scope, Rethink, Visionary, Hands to Communicate, Centre of Sign Sight Sound, Teeside & District Society for the Blind, British Deaf News and British Deaf Association N. Ireland.
- Liaised with these organisations to share our message through their owned channels and provide 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 3 explainer videos, as well as BSL versions of our TV adverts.
- Provided specific training on accessibility to our helpline staff who gave information about PPI. This included not speaking too quickly, being prepared to repeat or rephrase, giving the caller time to explain fully, not assuming the caller can see and read, and providing information to the consumer via our text relay service (which offered text-to-speech and speech-to-text translation services).
- Tested our website through an independent agency with users who had a range of visual, hearing and cognitive impairments. The FCA website was developed and tested in order to meet AA standards of accessibility under Web Content Accessibility Guidelines (WCAG), which are industry best practice standards. The accessibility of the FCA website is evaluated independently each year to WCAG standards. The PPI-specific website content was tested to the same standards and with a range of users ahead of campaign launch.
- Designed our consumer tracking research to include coverage of those who identify as having a disability.

32. For this audience, we also delivered an additional activity to those outlined in the original EIA:

- Worked to make our PPI website as accessible as possible, including adding the ReciteMe accessibility toolbar to our PPI website for the duration of the campaign. This toolbar allows users to translate content, change display settings including brightness and colour, provide audio read-outs of content, and more.

33. In the update to the EIA we published in the PPI Deadline Progress Report in October 2018, we noted that our mid-campaign tracking research indicated that among disabled audiences, awareness and understanding were tracking below the national average. We committed to considering a grass-roots programme of activity to target people with disabilities, as well as potentially reaching this audience through a network of care providers.

- 34.** During Phase 4, we secured support from new partners with a more localised presence (Teeside & District Society for the Blind, British Deaf Association N. Ireland, and Manchester Carers Centre). We also invested in a new Diversity Video on Demand (VOD) Platform to boost our reach of disabled people in the final phase.
- 35.** According to post-campaign tracking disabled people were more likely to recognise the campaign than the national average (78% vs 68% nat. avg.). The research also found that this group had similar levels of deadline awareness (68% vs 71% nat. avg.), understanding of PPI (73% vs 72% nat. avg.), understanding of how to check (71% vs 72% nat. avg.) and more understanding of how to complain (63% vs 46% nat. avg.).

LGBT

- 36.** For LGBT consumers, we previously identified relatively limited evidence of potential disadvantages. However, we did highlight that an LGBT customer considering making a complaint might be more confident in doing so if certain improvements were made to the customer experience. For transgender consumers, we identified that a PPI deadline might create disadvantages connected to changing name because of the process of personal identification in the course of the PPI complaints process.
- 37.** We took the following steps, as committed to in the original EIA:
- Provided 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 might face. We found that proof of identity was required to prove a name change, but that this was no different than for any other customer who had changed their name, and was to be expected. We tested the process with two large firms and were confident that these firms had thought about the issue of name/gender changes and had reasonable procedures in place.

Other groups considered

Low income and low financial confidence

- 38.** Our EIA identified that low income could be more likely to make someone vulnerable, and could be associated with lower financial confidence that might make complaining less likely. As such, our view was that there could be a potential adverse impact on this group.
- 39.** We took the following steps, as committed to in the original EIA:
- Tested the creative advertising concept with this group and took into account any feedback. This research demonstrated that the selected concept would resonate with people on low incomes and with low financial confidence.
 - Worked 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, Shirebrook Financial Health Group, Money & Pensions Service, One Manchester, Wrexham County Borough Council, and Shelter.

- Got partners to communicate our message via their owned channels, including the distribution of campaign materials.
- Launched media plans that delivered 99.96% coverage of low income and low financial confidence groups, reaching each person, on average, a total of 97.50 times across the four phases of advertising (with an average weekly frequency of 3.05 during on-air weeks).
- Designed our tracking research to ensure we could specifically track this group against the campaign objectives, in order to identify issues and make changes if necessary.

40. For this audience, we also delivered additional activities beyond those outlined in the original EIA. We:

- Developed a partnership arrangement with the Citizen's Advice (CA) to support vulnerable consumers. This included the arrangement (if needed) of house visits to the consumer's home by CA, as well as face to face meetings in local CA offices to help complete forms, contact firms and assist the consumer with their PPI checking enquiry or complaint.
- Established the facility to transfer consumers who called our helpline to their firms and other support organisations, such as the Ombudsman Service, Age UK, Samaritans and others.

41. In the update to the EIA we published in the PPI Deadline Progress Report in October 2018, we noted that our mid-campaign tracking research indicated that among this audience, awareness and understanding were tracking below the national average. We committed to considering a grass-roots programme of activity to target low income and low financial confidence.

42. During Phase four, we secured support from new partners with a more localised presence (Shirebrook Financial Health Group, One Manchester and Wrexham County Borough Council).

43. According to post-campaign tracking low income and low financial confidence groups were as likely to recognise the campaign as the national average (74% vs 68% nat. avg.). The research also found that this group had similar levels of deadline awareness (68% vs 71% nat. avg.), understanding of PPI (74% vs 72% nat. avg.), understanding of how to check (73% vs 72% nat. avg.) and more understanding of how to complain (55% vs 46% nat. avg.).

44. We also considered the position of those in, or discharged from, bankruptcy or other forms of personal insolvency (in particular IVAs and DROs).

45. We concluded that a PPI deadline was unlikely to cause any adverse impact on this group. As such, we did not put in place specific mitigating actions for this group. However, our mitigating actions in relation to people on low incomes and with low financial confidence were relevant for reaching this audience through the communications campaign. We also provided information for those with personal insolvency issues on our website, and through our helpline.

Carers

- 46.** Given the evidence on age and disability, we concluded in our original EIA that it was 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 ensured that the campaign was clear, understandable and presented the importance of making a decision, while signposting our website and helpline to enable carers to engage when convenient.
- 47.** In particular, we took the following steps, as committed to in the original EIA:
- Tested the advertising campaign with a relevant advocate organisation, obtaining comfort that the selected concept would resonate with carers.
 - Worked with Carers Trust and Manchester Carers Centre to share our messages, and the specific information relevant to the caring community, through their owned channels.

EIA overall conclusion

- 48.** Our assessment indicates that we have completed all the mitigating commitments we made in our EIA in PS17/3. We have also taken some additional relevant steps through the course of the campaign, particularly in response to our findings at the time we published the PPI Deadline Progress Report.
- 49.** Our conclusion is that the mitigating actions we have taken for each specific group have either eliminated the disadvantages we initially identified, or minimised them to a level where we are confident that it was reasonable and justified to proceed with our package of measures. We state this, considering the rationale for implementing the package of measures including the deadline and campaign, and the fact that we did not think we could reasonably and proportionately achieve our overall aim of an orderly conclusion to the PPI issue by other means.

Annex D

Firms' enhancements concerning vulnerable customers' PPI journeys

This annex provides detail on other enhancements firms made (see 4.5-4.7 above) to their PPI processes for vulnerable consumers.

- i. *Firms enhanced PPI staff's ability to identify vulnerable customers and understand how to assist them – for example by:*
 - rolling out enhanced training, with interactive exercises relating to specific PPI vulnerable customer scenarios and involving relevant soft skills, followed by tests and extra coaching where needed
 - training staff in the various industry-approved models for identifying, understanding and supporting vulnerable customers through in-depth conversations
 - establishing an online support hub for PPI case handlers, that included specific vulnerable customer case studies, procedures, guidance and points of contact
 - promoting a culture where fair treatment of vulnerable customers was championed, by sharing examples of good practice and recognising colleagues who had taken steps to provide additional support to vulnerable customers
- ii. *Firms improved proactive identification of vulnerable consumers – for example by:*
 - updating telephony processes and scripts to prompt PPI staff to ask every consumer proactive questions about potential vulnerability and support needs
 - updating vulnerable consumer process guidance for the branch network to include prompts
 - updating complaint forms with an additional prompting question and 'free format' text box to help customers say earlier if they have additional needs
 - ensuring any existing records of vulnerability were utilised from the outset
- iii. *Firms improved systems for recording customer support needs and tracking their delivery – for example by:*
 - ensuring that where vulnerability is identified it is flagged in the case management system, along with actions, adjustments and the eventual customer outcome
 - requiring all cases where potential vulnerability is identified to be escalated to a specialist care team for assessment, who would consider what action was required to assist (eg offering a home visit or text-phone call); that team would also track the customer's case until they considered that the vulnerability had been responded to appropriately and the journey completed satisfactorily
 - introducing a vulnerability checklist in which complaint handlers must confirm and document throughout the complaint lifecycle that they had adhered to the vulnerability procedure

iv. *Firms improved quality assurance (QA) – for example by:*

- adding key questions to the monthly PPI QA framework to assess adherence to the vulnerable customer procedures and identify any failings
- introducing monthly group case reviews of the handling of PPI complaints from customers in vulnerable circumstances, to learn lessons and share best practice
- providing extra coaching and additional checking for staff whom QA results showed not to have met required standards for handling a vulnerable consumer

v. *Firms improved their monitoring of vulnerable customer outcomes – for example by:*

- changing systems to produce regular management information (MI) on the proportion of vulnerable customers who did not complete the complaint process (the 'drop-off'), compared to other customers
- analysing drop-off cases and taking further action on these where appropriate, to re-engage the customer back into the process
- reviewing enhanced monthly MI to see if there were persisting gaps or obstacles in the PPI journeys that vulnerable customers were experiencing
- enhancing reporting to enable review of whether customers were benefitting from the specialist support on offer

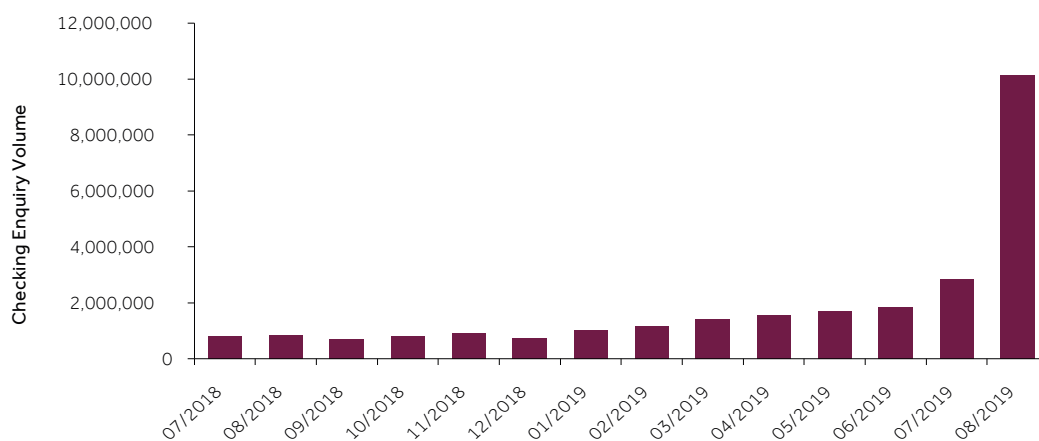
vi. *Some firms reported initial positive results in early 2019 from their enhanced QA and MI, for example:*

- a range of reasonable adjustments being offered to consumers, showing that staff had a good understanding of the options available
- only a small percentage of QA scores showing a failing in addressing vulnerability, with the fail rate falling in later months as the new processes became embedded
- a very low drop-off rate between vulnerable consumers receiving a positive PPI enquiry response and then submitting a complaint
- PPI complaint uphold rates that were slightly higher for vulnerable consumers, with a rate of 'No PPI' outcomes that was slightly lower
- a lower proportion of dissatisfaction from vulnerable customers about the service they received during their complaint journey than for other complainants

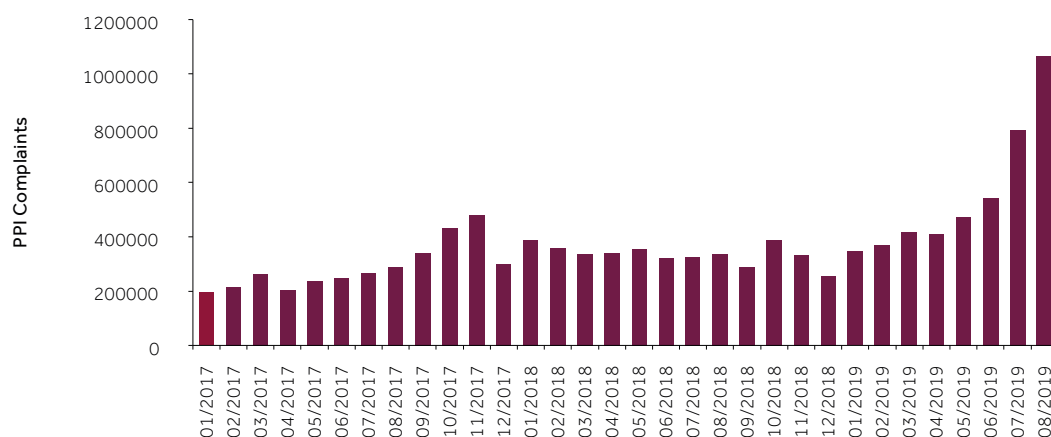
Annex E

Consumer actions just before the campaign and during it

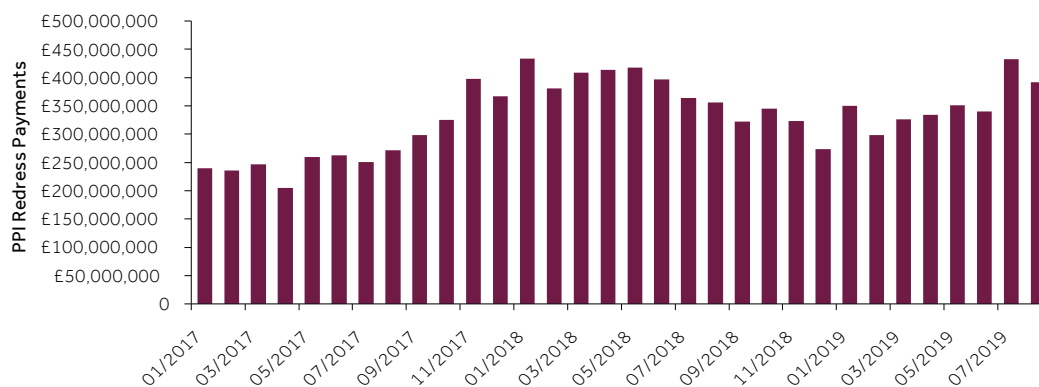
Trend in monthly PPI Checking Enquiries (subset of firms)



Monthly PPI Complaints before and during campaign

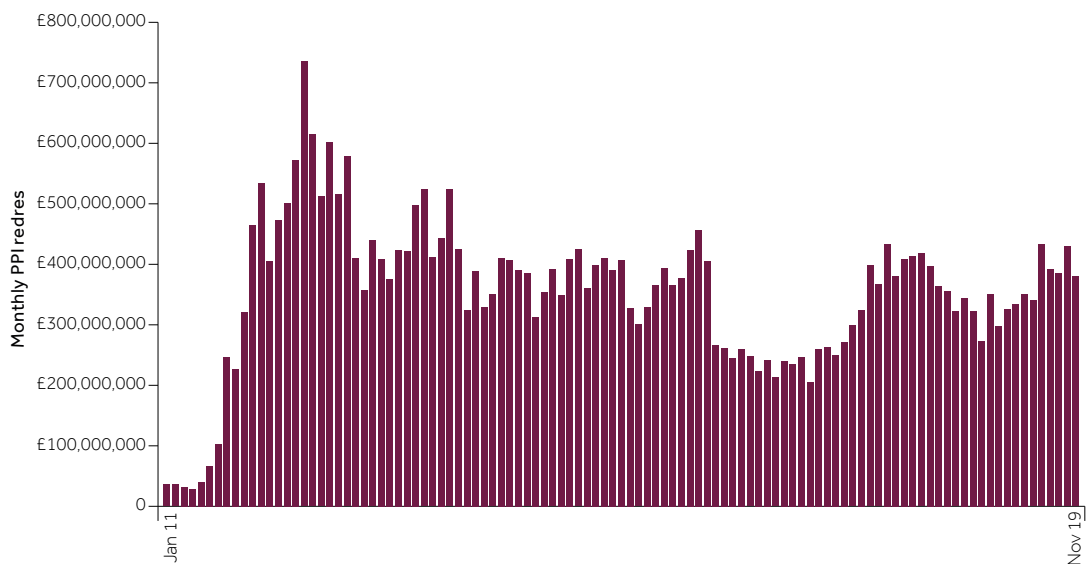
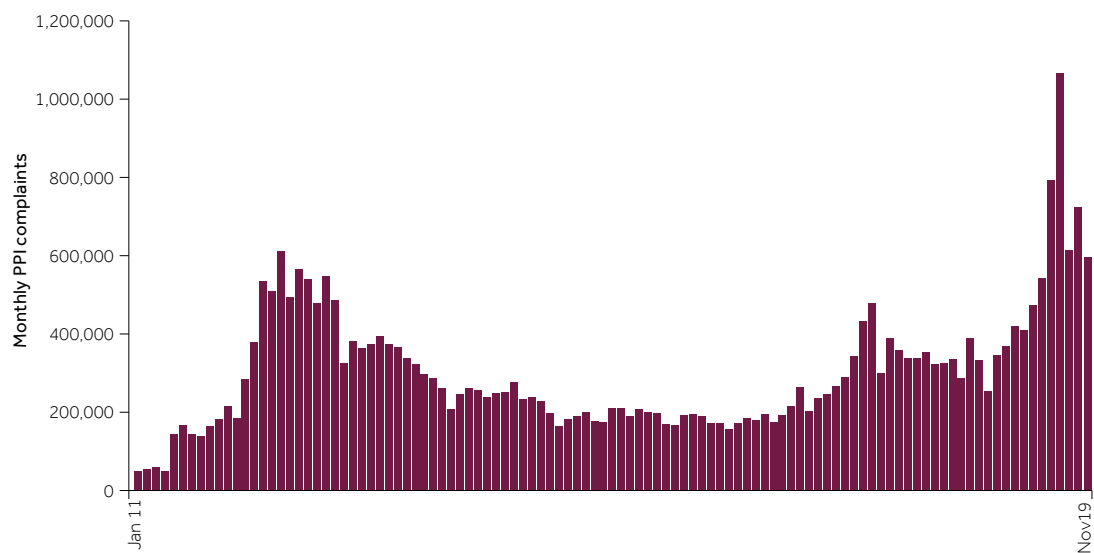


Monthly PPI Redress Payments before and during campaign



Annex F

Monthly PPI complaints and redress since 2011



Annex G

Partners who supported 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	Wrexham County Borough Council
Shirebrook FHG	British Deaf News
Hands to Communicate	Manchester Carers Centre
Centre of Sign Sight Sound	British Deaf Association N. Ireland
Money & Pensions Service	Knowsley Council
One Manchester	Teesside & District Society for the Blind

Annex H

Campaign improvements and value for money

1. The consumer communications campaign cost £42.2 million (including VAT) and was paid for by the 18 fee-paying firms who received the majority (around 90%) of PPI complaints.
2. We committed to a 'test and learn' approach throughout. We gathered and analysed data after each phase to inform the objectives and design of the next. These 'optimisation sprints' involved us working with agencies to make strategic changes, such as amending messaging focus, and tactical tweaks, such as the scheduling of radio advertising. This approach helped us optimise the impact of our campaign and its value for money.
3. We refined and optimised all campaign elements through the campaign in light of experience. However, the area where we can most precisely evaluate our optimisation is media buying. We made changes phase on phase, repeating what went well and adjusting areas where we saw room for improvement. For example, between Phases 2 and 4, we made targeting and scheduling changes to the radio plans; this resulted in an 18 percentage point increase in return on investment.
4. At the end of Year 1, we also conducted an econometric modelling feasibility test, to explore its potential usefulness for campaign planning. The aim was to model the impact of our campaign on consumers' awareness of the deadline by removing other possible influences (eg CMCs' advertising). We hoped such modelling could help us fine tune our remaining budget allocation to the most impactful media channels. We worked with independent econometricians, expert in marketing mix modelling. However, they concluded that they could not isolate the impact of our campaign sufficiently accurately to guide our future spend. Nonetheless, the exercise did provide some broader insights into the wider PPI advertising landscape that fed into our campaign strategy in Year 2.
5. We commissioned independent media auditing after each phase of advertising. This helped us ensure that our agency was buying media efficiently and effectively, and delivering value for money for the campaign. Our final audit reported that, on average, our media was bought 20% cheaper than market rates, saving £2.6 million. As a result, we could buy additional or higher quality advertising and reach more people more times.
6. As well as buying media efficiently, our agency negotiated with media owners about costs and leveraging free inventory. They report having achieved £1.2m added value for the campaign over the four phases of advertising.
7. The table below provides final details of spend (including forecasted estimates for items which are still in progress: helpline and website, legal fees, staff costs, contingency).

2-year budget breakdown	Spend estimates (inc VAT)
Media (advertising spend)	£25.2m
Production (including talent fees)	£5m
Helpline and Website	£4.8m
Partnerships, PR and social media customer service	£2.1m
Agency fees	£2.4m
Evaluation and testing	£1.6m
Legal fees, staff costs, contingency	£1.1m
TOTAL	£42.2m

Annex I

Abbreviations used in this document

BAME	Black, Asian and minority ethnic
BSL	British sign language
CA	Citizens Advice
CAWI	Computer Assisted Web Interviewing
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
ICO	Information Commissioner's Office
IVA	individual voluntary arrangement
LGBT	lesbian, gay, bisexual, transgender
KPI	key performance indicator
MMC	Multicultural Marketing Consultancy
nat. avg.	national average
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
Q&As	Questions and answers
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
VOD	Video on demand
WCAG	Web Content Accessibility Guidelines

