**Recommendations:**  
✔️ **Monitor late payment patterns** – customers who consistently pay late but do not default could benefit from proactive engagement.  
✔️ **Identify high-risk customer interactions** – frequent account logins or repeated payment extension requests may indicate financial strain

**Recommendations:**  
✔️ **Analyse arrears rates for vulnerable customers** – do they enter arrears at higher rates than others?  
✔️ **Assess complaint resolution times** – ensure vulnerable customers are not waiting longer for responses.  
✔️ **Introduce a quarterly review of vulnerable customer cases** to track progress and identify any required policy adjustments.

**Recommendations:**  
✔️ **Introduce annual refresher training** – including assessments or case study reviews.  
✔️ **Expand real-life case study training** – anonymised customer interactions could provide deeper insights

**Next Steps for SLPL**

**Immediate (Next 3 Months)**

✔️ **Review vulnerable customer outcomes** – compare arrears and complaint resolution data for vulnerable vs. non-vulnerable customers.  
✔️ **Enhance internal data monitoring** – flag early distress signals based on **late payments, payment extensions, or increased customer interactions**.  
✔️ **Improve training impact measurement** – introduce knowledge assessments or scenario-based testing.

**Medium-Term (6–12 Months)**

✔️ **Embed vulnerability considerations into operational processes** – ensure policies are reviewed with vulnerable customers in mind.  
✔️ **Develop a structured feedback loop** – use surveys or post-support reviews to track customer experiences after receiving help

**Compliance Feedback Review**

**1. Repayment Plan Review Triggers**

**Issue:** Missing scheduled review tasks for repayment plans.  
**Analysis:** Without automated review tasks, customers may experience inconsistent monitoring, leading to potential financial risks.  
**Recommendation:** Implement CRM-based automated review triggers or set up scheduled reminder emails every three months to review repayment plans.

**3. Outdated Email Signatures**

**Issue:** Some email templates still include signatures from an ex-employee.  
**Analysis:** This may cause confusion among customers and potential reputational risks.  
**Recommendation:** Conduct regular audits of all email templates to ensure they reflect current employee details.

**5. Income Evidence Requests**

**Issue:** Lack of clear guidance on acceptable income verification documents.  
**Analysis:** Customers are uncertain about what documents to submit, leading to unnecessary delays.  
**Recommendation:** Update request templates to specify acceptable documents (e.g., payslips, bank statements) and provide clear submission instructions.

**6. Vulnerable Customers & Forbearance Failures**

**Issue:** Cases of delayed follow-ups, inconsistent application of breathing space, and generic responses to vulnerable customers.  
**Analysis:** These issues raise concerns about compliance with FCA regulations and customer treatment.  
**Recommendations:**

* Automatically apply a 30-day breathing space hold when a vulnerability flag is raised.
* Train agents to deliver tailored responses for vulnerable customers.
* Strengthen tracking mechanisms for vulnerable customer support to ensure timely follow-ups.
* Ensure the Debt & Mental Health Evidence Form (DMHEF) is provided when mental health concerns are raised.

**7. Debt Management & Payment Arrangements**

**Issue:** Inconsistent handling of Debt Management Plans (DMPs) and unrecorded partial settlements.  
**Analysis:** These inconsistencies could result in non-compliant processes and customer confusion.  
**Recommendation:** Standardise DMP processes and ensure all partial settlements are properly recorded.

**8. Statutory Notice Failures (NOSIA)**

**Issue:** Some statutory notices (NOSIA) are sent late or not at all.  
**Analysis:** This creates potential legal and regulatory risks.  
**Recommendation:** Improve automation of NOSIA notices within the CRM and implement periodic audits to ensure compliance.

**9. Right to be Forgotten (RTBF) & Subject Access Requests (SAR)**

**Issue:** RTBF accounts remain visible in CRM; SAR cases are misclassified as complaints.  
**Analysis:** This may lead to GDPR breaches and potential penalties.  
**Recommendation:** Automate the RTBF removal process and introduce a structured checklist for SAR handling.

**10. Treating Customers Fairly (TCF) & Transparency Issues**

**Issue:** Misleading SMS wording and unclear income verification requests.  
**Analysis:** Communication gaps may mislead customers and erode trust.  
**Recommendations:**

* Optimise the e-sign process to prevent redundant communications.
* Revise SMS messages for clarity to avoid misinterpretation.
* Clearly define and communicate acceptable income verification documents.