

Date and Time	4 th April 2023, 2pm – 3pm	Venue	Teams
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Attendees			
Richard Farr	Telos Solution & Chair	Bev Robertson	APCC COO & Minute Taker
Liz Coyle	TIFAC	Graeme Stewart	Paradigm
Ciara Cremin	Clear Compliance	Chris McGreavey	Tenet
Tony Catt	The Catts Eye View	Jodie White	Product Partnership
Jordon Hunnable	BDO	Jonathan Barrett	Comentis
Adrian Golifer	Create Solutions	Michael Borrelli	MC Borrelli
Neelam Ali	Clear Compliance	Patty Francis	Compliance (South West) Ltd
Julie Ampadu	Chameleon Compliance	Tony Lewis	ThreeSixty Services
Bhavisha Patel	Objectivus	Thomas Story	BDO LLP
Archana Ravindran	API Compliance	Karen Shenton	Create Solutions
Apologies			
Helen Lord	VRS		

Agenda	Time	Discussion	Action
Review of last Minutes		<p>Welcome, minutes of last meeting and matters arising</p> <p>Richard advised that the Comentis framework is almost ready and will be shared with the group as soon as it is. Jonathan Barret gave an overview of the framework.</p> <p>He advised there are two things. One is what we're calling the vulnerability quadrant, and they're looking at this in terms of how can you know what's the framework in which firms can support vulnerable customers and clients. And secondly, within that framework, what can they actually do?</p>	The group will provide feedback once the final framework is available.
Consumer Credit		Richard discussed the consumer credit sector as this is very transactional and has the potential to have a lot of vulnerable customers and another member from the Consumer Credit group gave an overview of the work that group have been doing but its in very early stages.	

	<p>It was agreed the expectations of credit brokers had increased, and another member was also seeing a large increase in the scope of what is expected, and some firms are plugging an education piece at the beginning of the journey to ensure it's the right fit for the client before they start the sale. The group also discussed how motor traders and how they are entirely data led.</p> <p>They also discussed the paper around Borrowers In Financial Distress, and the challenges of clients who are a cash only type purchaser.</p> <p>The group also discussed distribution chains and the challenges that they are facing in embedded Vulnerability and Consumer Duty.</p>	<p>The group are to advise Bev if they will contribute to this work.</p>
APCC Spring Conference	<p>Richard went over some of the speakers who had touched on Vulnerability such as FOS and Mick McAteer from the Financial Inclusion Centre.</p> <p>Bev is to contact FOS and ask how they assess and make allowances for vulnerability when they're dealing with customers who have gone to FOS for support.</p>	<p>Bev to contact David Bainbridge</p>
Live and Locals	<p>The FCA Live and Local sessions were discussed. Richard asked how the content was, and Julie advised that they are positive and that the FCA feel most firms will be prepared, others felt that some sessions weren't very helpful.</p> <p>Liz Coyle offered to post a specific question to the FCA, to ask how does vulnerability apply to this given that they've said at the beginning it runs throughout the whole thing. Can they expand?</p>	<p>Liz Coyle to pose a question at the Live and Local she is attending.</p>

	<p>Others felt that many questions were not well answered.</p> <p>It was agreed that the Authorisation dept were asking many questions on this at authorisation stage and this seems to be different to the views of Supervision.</p> <p>Some other trade associations are giving bad advice as to who Consumer Duty applies to. Julie is to feed this back to the FCA.</p> <p>Richard asked if the APCC could raise a question with the FCA, how would they square it to the group who have identified an unbalance in approach between authorisations and supervision.</p>	<p>Julie to provide feedback to the FCA</p> <p>Bev to raise this with the FCA</p>
Date of next meeting	Tuesday 9 th May 2023, 2pm – 3pm	Bev to send invite