

Response to the Treasury Committee's Inquiry into Consumers Access to Financial Services

We are pleased to respond to this inquiry by drawing the attention of the Committee to TISA's interest and work on customer vulnerability.

About TISA

TISA is a unique, consumer focused, financial services membership organisation. Our aim is to improve financial wellbeing by aligning the interests of UK consumers, the financial services industry and the economy. TISA's membership comprises over 200 firms representing all sectors of the financial services industry. TISA also supports a range of operational and technical initiatives targeted at improving infrastructure, processes, and standards of practice. TISA has a successful track record in working with government and regulators to enhance customer outcomes.

Vulnerable Customers

A key focus for TISA is the need to foster a more financially resilient society. One area that needs more attention are the needs of vulnerable customers – indeed it is our view that improving the way the industry responds to such situations will deliver improvements for all customers.

Customer vulnerability has strong connections to the issue of financial inclusion, but its effect is found throughout our society, covering a multitude of situations: physical or mental impairment, life-changing circumstances such as bereavement, divorce and loneliness, language and educational needs, and service abroad. It also affects those close to vulnerable people: their family, carers, employees and other dependents. We are all potentially vulnerable, or likely to be so at some point in our lives; it is not a minority issue in society, and it is therefore a core focus for financial companies.

Whilst many of our members have made strong progress on vulnerability, the need for continuous improvement is well-recognised. Other firms are at an early stage of their work and some have plenty to do to understand the issue and embed good practice in all their operations.

Our Work

TISA's aim is to raise awareness and develop solutions that will improve the experience that vulnerable people have in their dealings with the financial services industry. We established a working group of our members in 2017 and it is proving a useful forum for firms to share knowledge and experience. Policy and practice in this area is not seen as a source of competitive advantage, but something that reflects on the industry as a whole and can be tackled co-operatively.

In September 2018 TISA held a conference on vulnerability and received an unprecedented response with places over-subscribed and lively audience engagement. We had participation from leading charities, public bodies, and trade associations; the success of the conference has encouraged us to hold further events next year, and to deepen our relationships with subject matter experts at major charities, in order to develop educational content.

We are also working with Altus to develop a self-assessment tool that will help firms to identify the gaps in their systems and processes where they apply to vulnerable customers. When the tool is complete we hope that it will be an invaluable aid for firms to prioritise those areas of their business most in need of improvement to meet best practice.

Whilst we are in early stages of work on this development we will be happy to provide an update on our progress in the future.

12th December 2018