

FCA Motor Finance Redress Scheme

Our services to support you

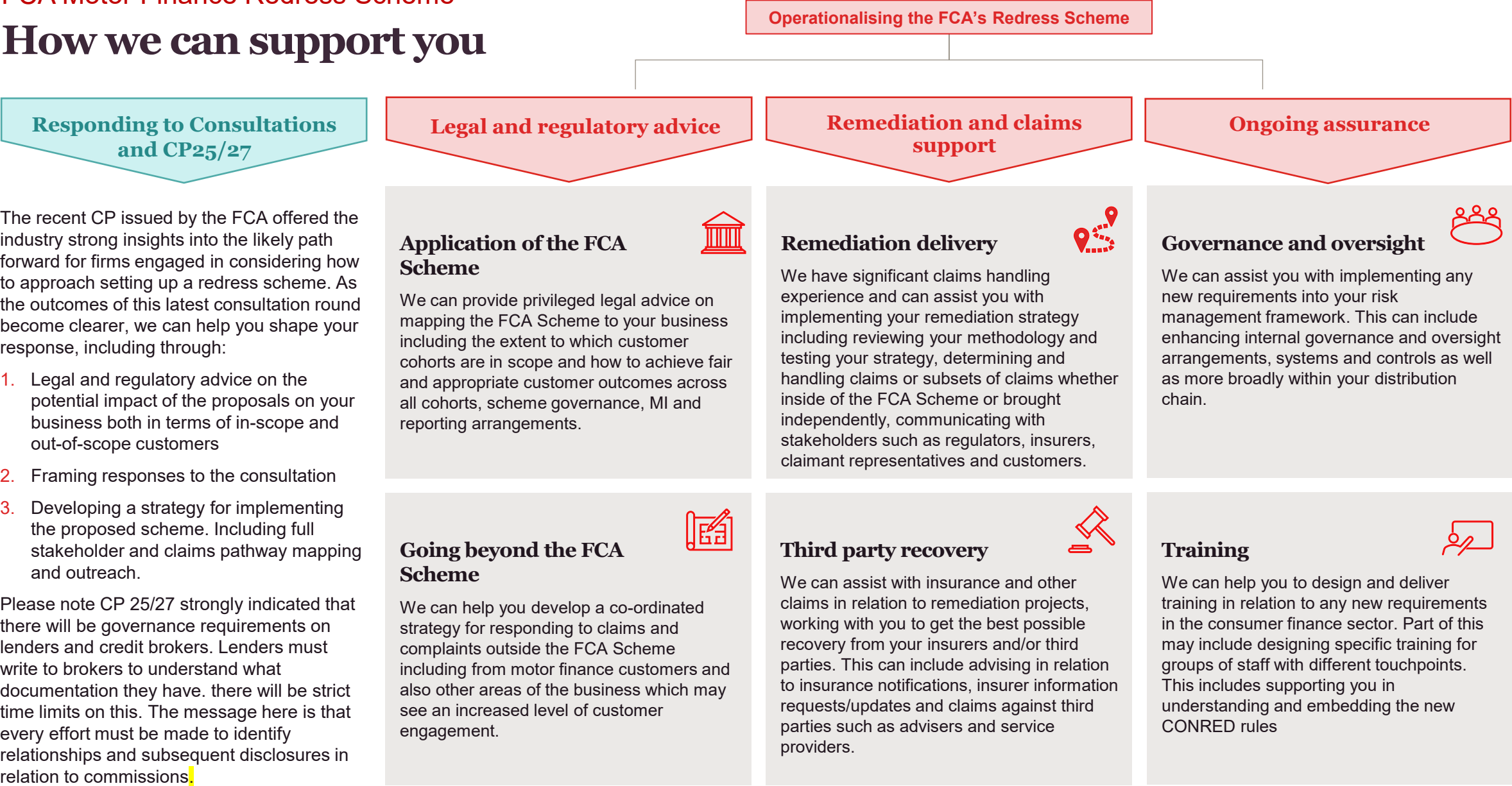
Financial Services Regulatory Team
November 2025

Norton Rose Fulbright LLP



FCA Motor Finance Redress Scheme

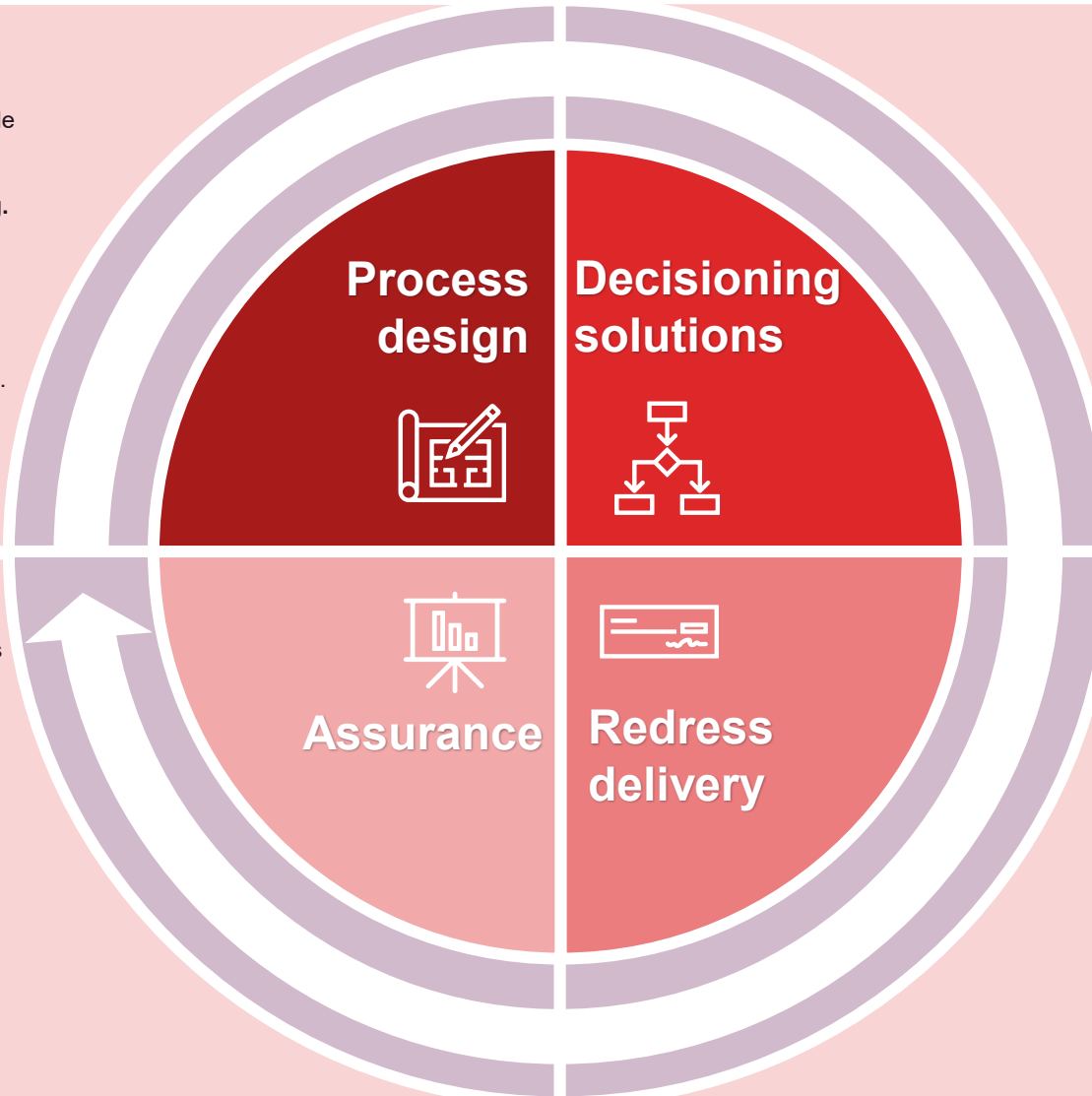
How we can support you



Supporting you through the redress lifecycle

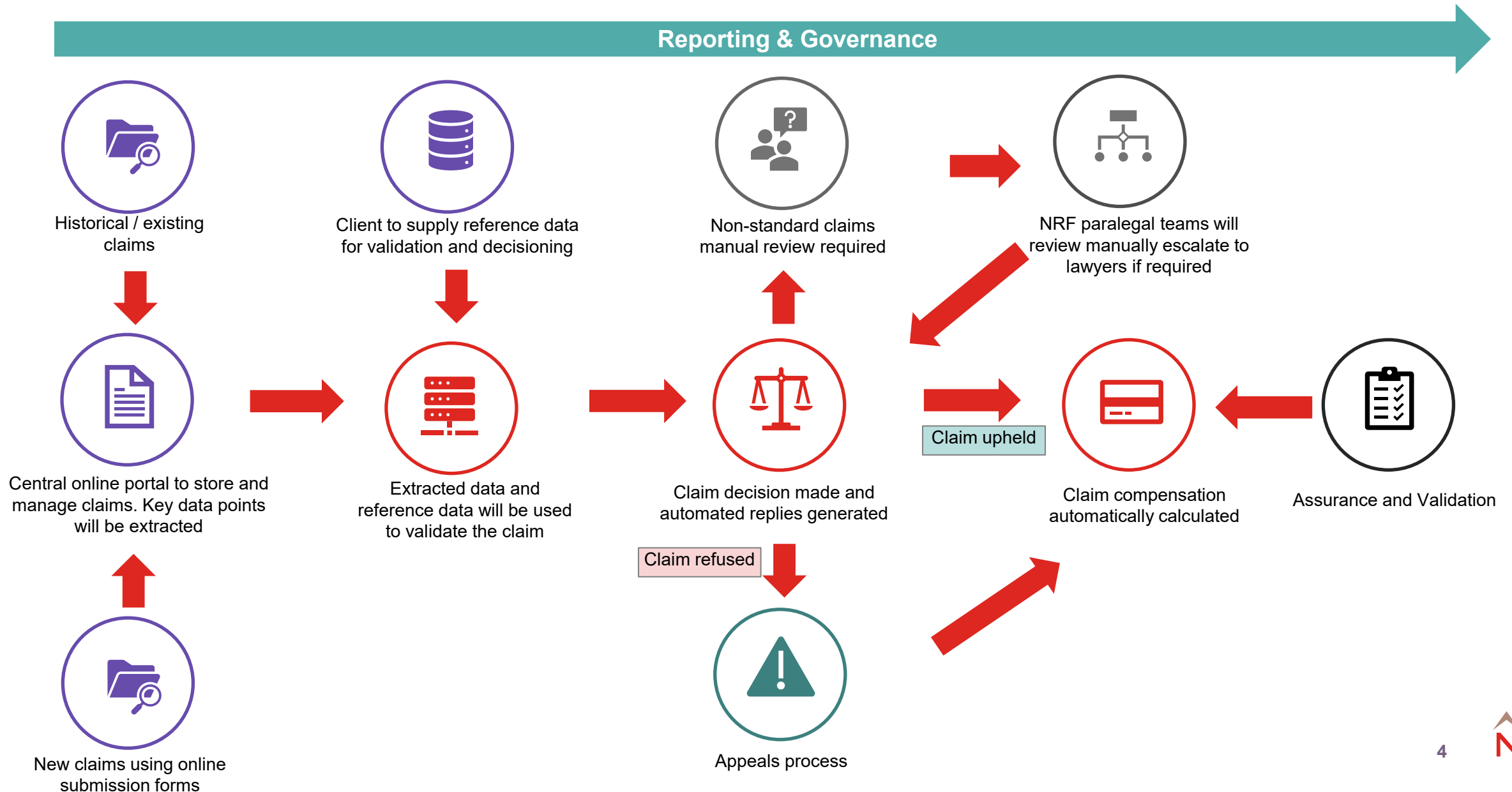
- **Matching FCA requirements:** We can help design a process to implement the FCA's Redress Scheme ensuring all the mandatory criteria are followed and leveraging technology and automation as far as possible but including manual case handler reviews where needed. **Calculation support, focused on interest application and risk triggers indicated by FCA – e.g. high commission, tied arrangements.**
- **Validation:** Using structured data points and reference data, such as customer details and account details, we can build a solution that automatically validates the complaint and its eligibility, based on criteria set by you.
- **Beyond the FCA Redress Scheme:** Our advice can include considering the implications for customers outside the scheme and how best to handle complaints and claims to achieve fair outcomes

- **Quality assurance:** Our experienced team of technology experts, claims handlers, paralegal, Risk Advisory consultants and lawyers, will regularly assess the effectiveness of the process and its accuracy in achieving outcomes.
- **Reporting:** We can support the provision of bespoke reporting and Management Information packs including thematic trends, root cause analysis, mapping against key project milestones and objectives, financial outcomes etc.

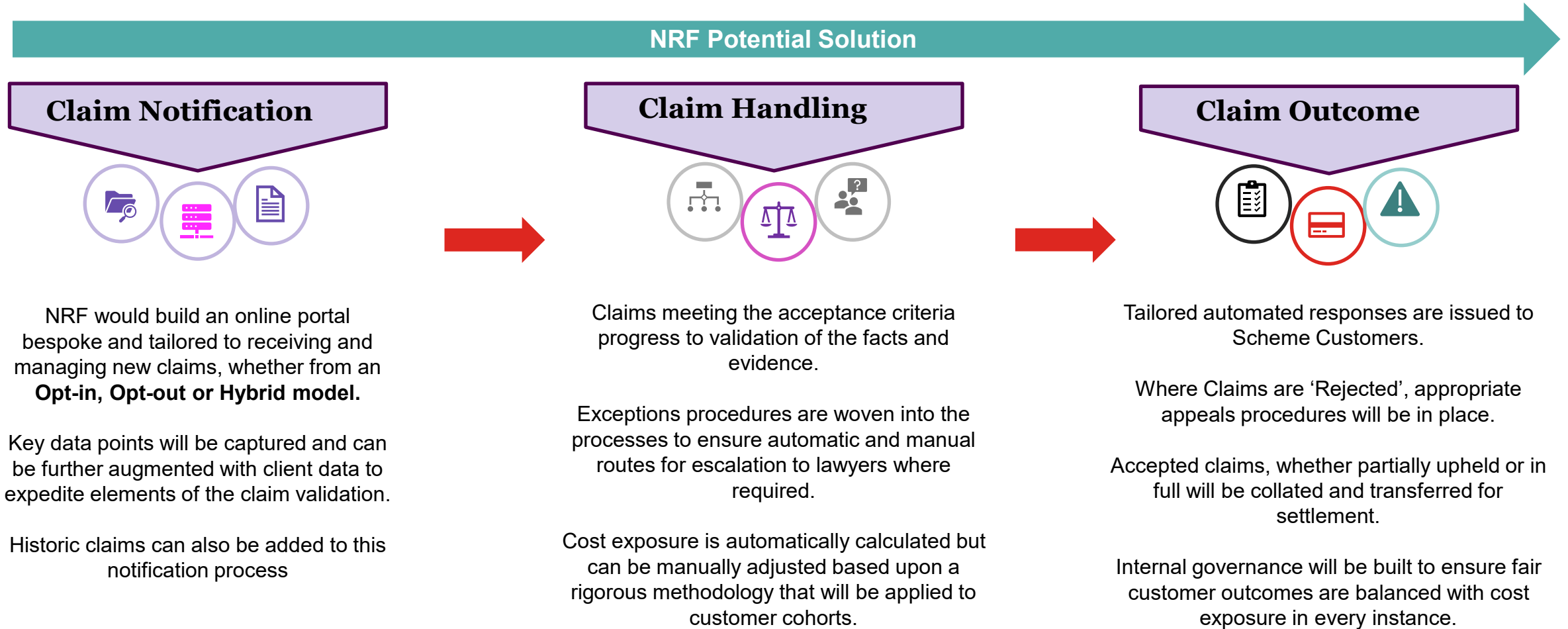


- **Decisioning:** We can process eligible complaints through a defined list of scenarios, triggers, and rules to provide efficient and timely decision making. This system can be designed to allow for manual reviews by our team in specific instances, such as review of complainant evidence, vulnerability assessments and appeals.
- **Resourcing:** We can supplement your resources at different stages of the redress process including through manual reviews and/or customer appeals.
- **Communications:** Using the above process, we can issue automatic communications to complainants on your behalf, such as confirmation of receipt, information requirements and decision notices.
- **Implementation support:** We can support throughout delivery to ensure the smooth implementation of the redress process for example by advising on appropriate treatment of exception cases or providing an independent appeals process
- **Delivery:** We would work with you and/or third-party providers to design systems to deliver remediation to customers including consideration of alternative approaches to remediation
- **Governance:** As per CP25/27's direction towards suitable governance arrangements, we would establish appropriate governance arrangements to support the delivery programme, working within your existing firm governance architecture including through steerco and wider governance arrangements

Claims Process



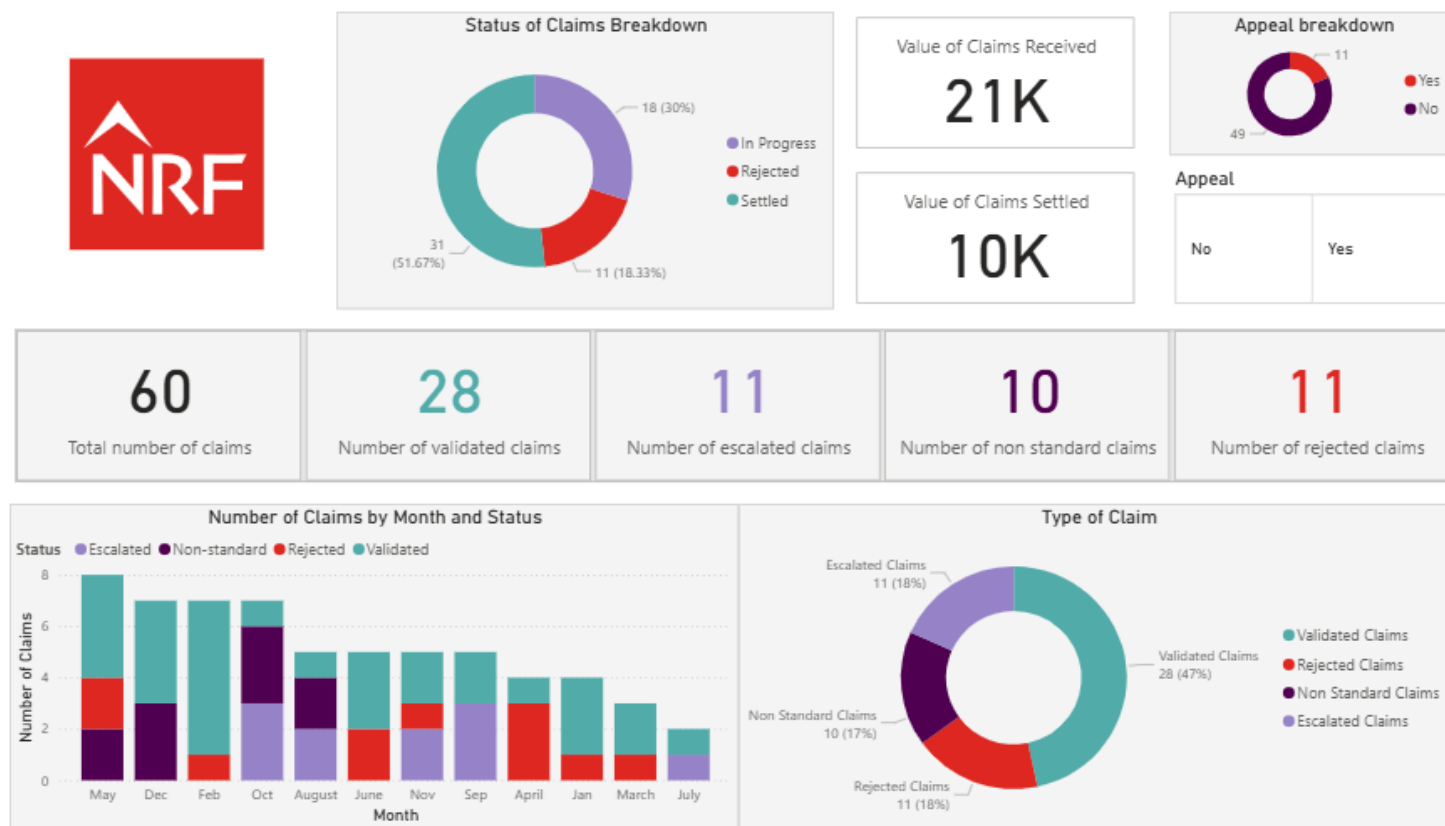
Claims Process



Each step of the process carries quality assurance and supervision by experienced Claims Professionals and Lawyers.
Operational and Supervisory M.I. Dashboards built to specification.

FCA Redress Scheme

Data-led reporting



- The data-led approach to claims handling allows reporting to be generated across all areas of the process e.g. volumes and status of claims, customer details, value and status of claims, claims pathways
- Dashboards, reporting frequency and requirements will be agreed as part of the solution development

Remediation and claims handling experience

Redress Case Studies

We deliver innovative remediation and claims handling solutions by harnessing the capabilities of our multidisciplinary teams and technology. Our flexible paralegal resource based in Newcastle ensures scalable support tailored to clients' needs.

To find out about our award-winning solutions please get in touch.



Developing a custom claims and litigation matter management solution

By collaborating with a Fortune 500 energy company, we created a Microsoft 365-based litigation management platform that replaced manual processes with a centralised, user-friendly solution. Our innovative approach streamlined case tracking, automated reporting, and improved collaboration, while robust change management ensured smooth adoption. The result is greater efficiency, reduced risk, and enhanced, data-driven decision-making for legal teams worldwide.

Managing flight delay claims

We were engaged by a prominent client in the aviation industry to manage large volumes of airline claims. Incoming claims have key data automatically extracted, are assigned to automatic tracks based on ongoing client discussion and automatic responses are prepared. Data can then be used to fraud or identify operational improvements. **The award-winning solution** currently has the capacity to handle 10,000 claims at a time and our work includes pre-action correspondence, alternative dispute resolution, responses to National Enforcement Bodies' complaints and advice on strategy and processes.

A new model for dealing with litigation following a significant cyber-attack

Norton Rose Fulbright developed an **award-winning**, innovative, technology-enabled model to manage complex litigation following a significant cyber-attack. By creating a Microsoft 365-based litigation management platform, the firm enabled the efficient and coordinated defence of thousands of claims across multiple jurisdictions. Developed by a multidisciplinary, cross-border team, this centralised, user-friendly system streamlined case tracking, automated reporting, and improved collaboration. The approach empowered clients to handle large volumes of individual, and group claims more consistently and efficiently, delivering enhanced risk reduction and data-driven decision-making in litigation management.

Provident Scheme of Arrangement Adjudication – Affordability Claims & Redress

NRF were appointed as Scheme Adjudicators in reviewing over 25,000 Affordability Claims which had been initially rejected and then appealed. Over 95% of the cases were reviewed against a stringent scheme methodology, although there were a large number of cases requiring further manual reviews due to Customer vulnerabilities that were either missed, or misunderstood from the initial decision makers perspectives.

Save the Children Covid Inquiry support

NRF acted pro bono in supporting Save the Children UK (SCUK) in its role as a Core Participant in the UK government's Covid-19 Inquiry. The inquiry looked at all aspects of the UK government's decision-making during the pandemic, with SCUK's focus on whether the impact of those decisions on children's rights and wellbeing was adequately considered.

- Access to the disclosed material was granted and transferred to our in-house platform, facilitating access to market leading AI functionality.
- Working closely with SCUK parameters to identify material of interest to SCUK were defined.
- Nine AI models were used to determine relevance for key documents and core SCUK issues. These models 'learnt' from each document review decision.
- This data-driven approach enabled SCUK to identify and focus on the documents needed to build their case and to prepare for questioning witnesses.

Our work in supporting SCUK was **shortlisted for the FT Innovative Lawyers Europe 2024** award in the Innovative lawyers in pro bono category.

Motor Finance Commission Arrangements

Our consumer finance credentials

Adjudications

We have been appointed by the High Courts to run adjudication services in connection with a number of high-profile schemes of arrangement put in place to deal with customer claims for compensation in respect of historic consumer credit loan arrangements. This has involved detailed consideration of complex issues arising in connection with the methodology for claims handling and implementing a large-scale review process for decision-making in respect of contested claims.

Remediation: design and delivery

Advising on the design and delivery of a significant customer remediation exercise, following the identification of consumer credit and FCA Handbook breaches, identified through an internal review of a sample of customer files. We also advised on associated issues such as: communications with the regulator; governance and lessons learned; interaction with the FOS; a related insurance claim; potential contractual claims and other routes to recovery; and tax payable in connection with the remediation.

Early-stage disputes advice

Advising a payment processing company (operating globally) on early-stage disputes with merchants arising out of the client's global merchant services agreements. These disputes spanned multiple jurisdictions including the UK, France, Hong Kong, Japan and Russia.

FOS complaints strategy and handling

We have worked with a client to respond to complaints relating to actions taken in respect of a market dislocation event in the investment business sector; supporting across numerous aspects including in relation to contractual analysis, regulatory conduct and engagement, client communications and submissions to the Ombudsman.

'Present state' assessments

We have supported a client to improve 'present state' governance arrangements surrounding AR oversight, in light of a historic review of arrangements, and to update them in light of present regulatory standards and guidance.

Whistleblowing: establishing policies and procedures

We have supported clients across regulated sectors, including banking institutions, to develop and implement whistleblowing policies, as well as the procedural frameworks necessary to meet legal and regulatory requirements.

Whistleblowing: responding to internal whistleblowing

Conducting a quasi-166 governance review for a distributor of insurance products, following a whistleblowing report to the FCA regarding its oversight of an appointed representative and implementation of the Consumer Duty.

Section 166 skilled person reviews: advising the firm

Advising on a section 166 skilled person review, required by the PRA, into the bank's UK business, focusing on systems and controls, risk management, risk culture, governance, credit risk, and liquidity. In advance of the Skilled Person review commencing, we conducted an expedited in-depth review to ascertain the potential areas of exposure for the bank that might be identified, including those in which the bank could look to make enhancements in the short and longer term.

Section 166 skilled person reviews: advising the firm

Advising a bank on its successful solvent wind-down, interacting closely throughout with the PRA, the FCA, and the PRA-appointed Skilled Person. This mandate involved advising the bank on transfer instruments for specific banking assets and liabilities, as well as on data protection issues relating to the sharing of personal data of depositors and liaising with the FCA in relation to queries raised in relation to the client's data protection compliance.

Wind-down planning and execution

We have provided full-service support to a UK bank to wind-down its operations over a period of years, and to eventually achieve the cancellation of its permissions. We have also supported non-bank consumer finance firms to implement arrangements relating to historic liabilities and to work towards wind-down, as well as supporting a range of regulated firms in relation to the wind-down of business units.

Internal reviews and 'lessons learned' exercises

Advising in connection with a significant regulatory investigation and remediation project, arising from a customer complaint in respect of a mortgage loan. We also conducted a 'lessons learned' review, to identify the root causes of the identified issues, and made detailed recommendations regarding remediation of the relevant findings.

Internal reviews and 'lessons learned' exercises

Conducting a review for a private bank regarding conduct giving rise to a customer remediation programme, including considering breaches of consumer credit and regulatory requirements and implications in terms of systems and controls, making recommendations to address relevant issues and advising on individual accountability in relation to senior managers.

Internal reviews and 'lessons learned' exercises

Conducting a 'lessons learned' review for a bank in respect of consumer credit and regulatory issues arising from pricing activity in relation to retail and business customers, including considering the conduct of senior management.

Why partner with Norton Rose Fulbright?

Our multi-disciplinary team is uniquely placed to help you with your motor finance commissions project.



A global, multi-disciplinary team of experts

An integrated global team that comprises both legal specialists and non-legal advisors with a broad range of expertise, including risk management, regulatory compliance, corporate governance, investigations and disputes. We prioritise acting as a commercial partner to our clients, ensuring that we provide the technical excellence that they expect whilst delivering pragmatic and highly usable legal, regulatory and risk advice to support their business needs.



Flexible fee arrangements

We can structure advice and implementation projects in a variety of ways and offer a range of fee arrangements including fixed fees and monthly retainers. We will work with you to design a support package that meets your needs and have a number of tools to assist with budgeting for your project.



A team with deep market experience of advising firms on all issues relating to consumer lending

Our team regularly advises the largest firms on consumer lending issues.

We have deep experience of both compliance program design / implementation and regulatory investigations, remediation and redress exercises and related litigation. We also have significant experience in defending compliance programs to regulators and other authorities.

Our breadth of experience means we can help with benchmarking your approach in relation to your peers.



Advice that can benefit from legal privilege and protection from disclosure

Depending on how our work is structured and managed, you may be able to assert privilege over communications with us in relation to your project and protect certain materials from disclosure to third parties including prosecutors. We can advise on the best way of achieving this.

“They are engaged with the industry and bring innovative insights on industry trends. The team members are well versed in their subject matters and are excellent communicators.”

Chambers, 2025

“They are reliable, careful and solid in their advice. They have a thoughtful and measured approach and have comprehensive coverage and expertise of regulatory issues.”

Chambers, 2025

“The team take time to understand their clients’ business, culture and appetite for risk. They are practical and focus on the big issues.”

Chambers, 2025

“In-depth knowledge of the sector with lawyers at top of their game. They are pragmatic, commercial and not afraid to suggest innovative solutions.”

Legal 500, 2024

Key contacts



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