

PAYDAY LENDING MARKET INVESTIGATION

Review of the websites of payday lenders and lead generators

Summary

- 1. As part of our assessment of how effectively payday loan customers are able to shop around, we reviewed the websites¹ of a number of:
 - (a) large online lenders, in order to assess what information on payday offers is available online and how transparently this information is presented; and
 - (b) lead generators, in order to assess the information provided by these lead generators about the services that they offer.
- 2. For the websites of the major lenders, our preliminary observations are as follows:²
 - (a) key information about loan terms (covering the total cost of credit, default and late charges, speed of the process, loan duration, maximum and minimum loan amount) is typically available on each lender's website, and can be found in a small number of mouse-clicks or 'page down' commands; and
 - (b) the information is also in general clearly presented (using font of normal size and weight).
- 3. For lead generator websites, our preliminary observations are:
 - (a) All lead generators provide information on the price of a loan for representative examples, and this information is easy to access. More detailed pricing information is presented by some lead generators; however, these are always examples, and may or may not relate to the charges of a lender with which a customer is ultimately matched.

¹ Our analysis was carried out in the first week of December 2013. Our observations are therefore based on the information available on the websites we reviewed in that period.

² Our review does not cover other/smaller lenders. Therefore, these preliminary observations cannot be generalized to all lenders operating in the market.

- (b) Many lead generator websites emphasize the speed of loan availability.
- (c) Visually the homepages of lead generator websites look similar to those of the lenders themselves. Most sites present sliders, inviting prospective customers to indicate the size of the loan they are seeking and its duration. None of the websites reviewed reveal the fact that a provider is a lead generator in the company or product name or the title of the website.
- (d) However, all lead generator websites at some point inform visitors that they are a lead generator (in varying degrees of prominence and clarity). There is considerable variability in how the lead generators describe the service they offer on their websites:
 - (i) The most common approach from the sample is to talk in terms of 'matching' customers with a loan provider.
 - (ii) Several go further and refer to saving customers the need to search or shop around, which might be open to misinterpretation by customers; some customers might interpret the wording used on several of the sites (including the references to avoiding the need to shop around) as meaning that they were being matched with the 'best value' loans for them.
- (e) Few of the sites set out clearly the fact or nature of the financial remuneration that the generator earns for forwarding an application.

Lenders' websites

Methodology

4. We reviewed a sample of the 11 major payday lenders' websites.³ Where a lender offers more than one product, we selected its most common online product (with the exception of CashEuroNet and Dollar Finance for which we reviewed the online

³ The 11 major lenders included in this analysis operate 16 separate companies in the UK and market loans under around 22 different brands (see appendix to the companies background working paper for a full list of the companies and brands). Between them these lenders provide a range of single repayment and instalment loans available online and on the high street. Collectively, we estimate these lenders accounted for over 90 per cent of loans issued in 2012 and over 90 per cent of payday loan revenue in 2012.

information on two products each). We limited our review to lenders offering loans online.

TABLE 1 List of lenders' websites surveyed

Lender Product Website homepage

Wonga Little Loans www.wonga.com/

CashEuroNet QuickQuid Flexicredit www.quickquidflexcredit.co.uk/
CashEuroNet QuickQuid Payday www.quickquid.co.uk/
Dollar Payday UK www.paydayuk.co.uk/
Dollar PaydayExpress www.paydayexpress.co.uk

WageDayAdvance Wage Day Advance www.wagedayadvance.co.uk/index.aspx

Zebit Short Term Cash Loan www.zebit.com/
Cheque Centres The Loan Store Payday Loans www.ukloanstore.co.uk/
(online)

MYJAR MYJAR https://myjar.com/
CFO Lending Short Term Loans www.cfolending.com
Ariste Cash Genie—1-month loan www.cashgenieloans.co.uk/

SRC Speedy Cash www.speedycash.com/online-payday-loans/default.aspx

H&T Online Payday Loan www.handtpaydayloans.co.uk/

Source: CC.

- 5. For each website we measured whether information was available—and how accessible that information was—on the following loan terms:
 - (a) rate of interest and total cost of loan;
 - (b) default charges and late payment fees;
 - (c) speed of process (application, approval, funds transfer upon approval) and faster payment services (FPS) charges;
 - (d) minimum and maximum amount of loan; and
 - (e) minimum and maximum duration of the loan.
- 6. In order to assess the accessibility of information about each of these product characteristics, we recorded the number of clicks (or 'page down' button presses) from the homepage needed to reach the information, and also how clearly the information is presented (we looked at the font size and weight (normal, bold, grey/faded)).

Preliminary observations

Interest rate and total cost of loan

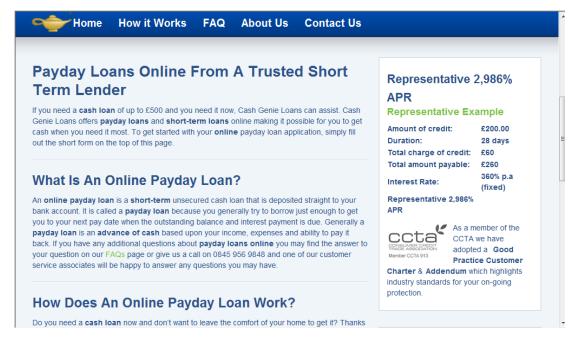
- 7. Information on interest rate (annual rate or APR) is typically shown in the homepage or can be found within a single mouse-click. The interest rates are generally clearly laid out (no small or scarcely visible font).
- 8. The large majority of websites we investigated also provide clear information on the total cost of the loan, and enable website users to calculate how the costs change when the relevant terms of the loan changes (typically, the amount borrowed but also the number of instalments or loan duration when this option is available). Eight out of the 13 websites have a slider which allows flexing the terms of the loan and seeing how the total cost of credit changes accordingly.
- 9. There are a few exceptions:
 - (a) QuickQuid Payday (CashEuroNet) provides a table showing the total cost for a £100 loan and how this varies depending on the creditworthiness of the customer and on the number of periods over which the customer chooses to repay the loan. However, it does not allow a website user to see how the costs change when the amount of the loan varies.
 - (b) Cash Genie—one month (Ariste),⁴ The Loan Store Payday Loans (Cheque Centre (online))⁵ and H&T Online Payday Loan (H&T) provide representative examples of the total cost of a loan (to varying levels of detail).

⁴ See Figure 1.

⁵ See Figure 2.

FIGURE 1

Screenshot of Cash Genie's homepage



Source: CC. Website accessed 4 December 2013.

FIGURE 2

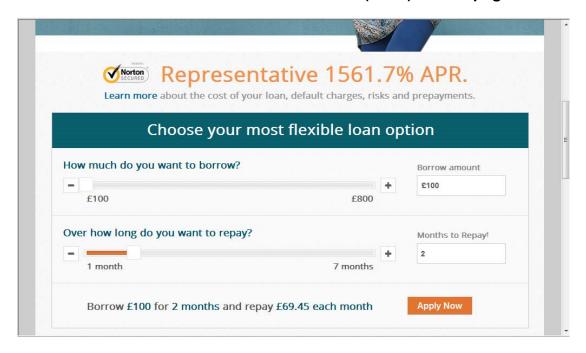
Screenshot of The Loan Store Payday Loans' homepage



Source: CC. Website accessed 4 December 2013.

10. Short-Term Cash Loan (Zebit) shows scenarios based on repaying the loan over a number of periods. If a borrower chooses to repay in more than one period, the site shows the amount that should be paid back in each period, but not the total cost.

FIGURE 3
Screenshot of Short-Term Cash Loan (Zebit)'s homepage



Source: CC. Website accessed 4 December 2013.

- 11. When there are compulsory fees that apply to every loan, these are included in the total cost figures. This is the case for Wonga which generally charges a £5.50 transaction fee on each loan. None of the other products we surveyed charge additional compulsory fees. Optional charges, such as FPS⁶ fees are not included in the total cost figures (see paragraph 18 for further details of the ease of accessing information on these fees).
- 12. Information is in general readily accessible either on the homepage or a few clicks away from the homepage. Table 2 summarizes the results.

⁶ Faster payment services is a payment service that reduces clearing time and enables payments made via electronic telephone banking, Internet banking and standing order to be completed quickly.

TABLE 2 Accessibility and clarity of the information on total costs of loan

Product	No clicks from the homepage	No pages down	Font size (big/normal/ small)	Font weight (grey-faded/ normal/bold)	Slider	Does TC include all compulsory fees?
Little Loans	0	0	Normal	Normal	Υ	Υ
QuickQuid Flexicredit	0	0	Normal	Normal	Υ	Υ
QuickQuid Payday	2	3	Big	Normal	N	Υ
Payday UK	0	0	Normal	Normal	Υ	Υ
PaydayExpress	0	0–1	Normal	Normal	Υ	Υ
Wage Day Advance	0	0–1	Normal	Normal	Υ	Υ
Short Term Cash Loan	0	1	Normal	Bold	Υ	Υ
The Loan Store Payday Loans	1	1	Normal	Normal	N	Υ
MYJAIR	1	1	Normal	Normal	N	Υ
Short Term Loans	0	0	Normal	Bold	Υ	Υ
Cash Genie— 1-month loan	0	1	Normal	Bold	Υ	Υ
Speedy Cash	2	1	Normal	Normal	N	Υ
H&T Online Payday Loan	1	1	Normal	Normal	N	Υ
Source: CC's analysis.						

Default charges/late payment fees

- 13. All the websites we surveyed provide information on default charges and late payment fees. We noted one instance in which the information presented to website users that have not entered the application process is incomplete. Short Term Loan (CFO Lending) indicates that a fixed fee of £25 is charged in case of a missed payment together with default interest on any overdue payment. However, it does not specify how much the default interest is. 7 We are further investigating the extent to which lenders' websites provide clear information as to how late payment/default costs are calculated (eg whether the interest rates are calculated on the principal, the full outstanding balance, or some other base).
- 14. Information is in general accessible within one or two mouse-clicks from the homepage, and/or one or two 'page down' button presses, and clearly laid out using fonts of normal size and weight. Table 3 shows the results of our assessment of the accessibility of information on default charges/late payment fees for each website.

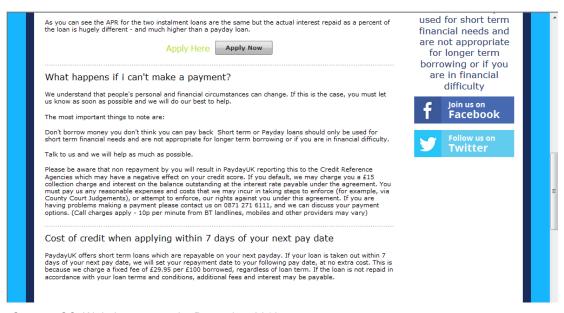
⁷ 1.2 per cent per day.

TABLE 3 Accessibility and clarity of the information on default charges/late payment fees

Product	No clicks from the homepage	No pages down	Font size (big/normal/ small)	Font weight (grey-faded/ normal/bold)	Website section
Little Loans	1	1	Normal	Normal	How it works
QuickQuid Flexicredit	1	2	Normal	Bold	Rates & terms
QuickQuid Payday	2	1	Normal	Bold	Rates & terms
Payday UK	1	2	Small	Normal	Our charges
PaydayExpress	2	2	Normal	Normal	FAQ
Wage Day Advance	1	2	Normal	Normal	Charges
Short Term Cash Loan	1	3	Normal	Normal	How it works
The Loan Store Payday Loans	1	2	Small	Normal	FAQs
MYJAR	1	1	Normal	Normal	How
CFO Lending Short Term Loans	1	1	Normal	Normal	Our charges
Cash Genie/Cash Genie Loans— 1-month loan	2	1	Normal	Normal	Rates & terms
Speedy Cash Payday Loans	2	1	Normal	Normal	Rates & terms
H&T Online Payday Loan	1	3	Normal	Normal	The cost of a payday loan
Source: CC's analysis					

- Source: CC's analysis.
- 15. There are, however, some instances where these fees are presented in smaller or less prominent font:
 - (a) Payday UK (Dollar) and The Loan Store Payday Loans (Cheque Centre (online)) adopt a relatively small font to report information on default charges.

FIGURE 4
Screenshot of Payday UK's 'our charges' webpage



Source: CC. Website accessed 4 December 2013.

(b) Cash Genie (Ariste)'s information on default charge is shown under the 'Rates&Terms' link which is displayed at the bottom of the homepage in a small and faded font.

FIGURE 5
Screenshot of Cash Genie's 'Rates & Terms' webpage



Source: CC. Website accessed 4 December 2013.

Speed of process and faster payment services charges

- 16. Speed of the process is an area where customers may find it more difficult to compare different lenders' products using the information presented on their websites. Lenders usually do not indicate how long the approval process may take. However, many emphasize the speed of money transfer post-approval: lenders often advertise that money is transferred to the customer's account a few minutes after the approval (eg 4, 5, 10, 15 minutes upon approval).
- 17. An exception is The Loan Store Payday Loans (Cheque Centre (online)) which describes in detail the average time required to complete the various stages (application, approval, funds transfer):

The entire process takes place online and the application form takes less than 5 minutes to complete. Once you've applied, we'll give you a decision in principle within just a few minutes**. If your decision in principle is positive, your loan agreements will then be displayed online

for your electronic signature. Once you agree to the terms and conditions of your loan, press submit and the documents will be returned to us electronically. If your loan was approved prior to 5.00pm, we normally will be able to submit funds to you the same day.

18. In our sample, four lenders charge a fee for FPS.⁸ This information is easily accessible (CFO Lending and H&T mention the FPS fee in their homepage) and is clearly presented, although not included within the total cost of credit reported on those pages.

Minimum and maximum amount of loan

- 19. The information on the minimum and maximum amount of loan is available on lender websites, and it is in general easily accessible either on the homepage or one or two mouse-clicks from the homepage.
- 20. However, website users may find it more difficult to determine how much new customers and existing customers can borrow. Although the information is available in the description of loan terms given on websites, we might expect customers to often infer the maximum amount of loan that they can borrow from the slider (where websites use sliders). However, whether a slider reflects the range available to either new or existing customers will vary between lenders. For example, Little Loans (Wonga)'s, QuickQuick Flexicredit (CashEuroNet)'s and Short Term Cash Loan (Zebit)'s sliders show the amount available to new customers. By contrast, the Payday UK and Payday Express (both belonging to Dollar) sliders reflect the range available to repeat/existing customers. With the exception of Little Loans (Wonga) which specifies above the slider that existing customers can borrow more than that implied by the slider, the other lenders provide information on the difference in the

⁸ WageDayAdvance, CFO Lending, SRC and H&T.

maximum loan between new and existing customers in a different section of their website ('Rates&Terms', 'How it works', 'FAQ', etc).

21. Compared with the other websites we reviewed, WageDayAdvance's site was less clear on the amount of loan available. The slider on the homepage goes up to £400. In the 'About us' section it states that the initial amount a customer can borrow is 'strictly limited to £300 first time round'. The slider in the 'how it works' section goes up to £750 (without specifying that this only applies to repeat customers). WageDayAdvance told us that it was currently updating the website to have both sliders showing the same maximum amount and it was also clarifying the text.

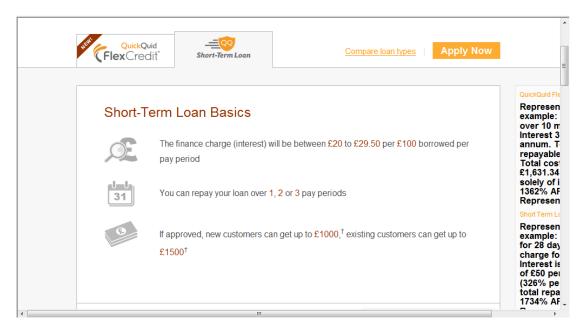
Minimum and maximum duration of the loan

22. Information on the duration of the loan is also in general easily accessible from the homepage of the websites we reviewed. Those products for which the repayment is not strictly linked to the payday set out clearly (typically on the homepage or a few links from it) the duration of the loan and the options available to customers. Figure 6 and Figure 7 below show a screenshot from QuickQuid Payday (CashEuroNet)'s and Short Term Cash Loan (Zebit)'s website (both products offer borrowers the option to repay in instalments).

⁹⁹ In response to our Market Questionnaire WageDayAdvance reports that the maximum loan for new customers is £350.

FIGURE 6

Screenshot of QuickQuid Payday's 'Rates & Terms' webpage



Source: CC. Website accessed 4 December 2013.

FIGURE 7

Screenshot of Short-Term Cash Loan's homepage



Source: CC. Website accessed 4 December 2013.

Lead generators' websites

Methodology

23. We reviewed of a sample of ten lead generator websites, which were identified by selecting providers which appeared prominently in the paid results of Google searches on the term 'payday loans' in November 2013. The websites included in our review are set out in Table 4.

TABLE 4 List of lead generator websites surveyed

Website name Website homepage Purple payday www.purplepayday.co.uk/ Cash wave www.cash-wave.co.uk/ Bee loans www.beeloans.co.uk/ iCash Advance www.icashadvance.co.uk/ Very merry loans www.verymerryloans.co.uk 100 day loans www.100dayloans.co.uk/ Cash until Friday www.cashuntilfriday.co.uk/ Now payday www.nowpayday.co.uk/ www.kwikcash.co.uk/ Kwik cash Piggy payday www.piggypayday.co.uk/

Source: CC.

- 24. For each site, we reviewed the following:
 - (a) the information provided about the price of a loan; and
 - (b) the ease with which lead generator websites can be distinguished from those of lenders, and how the lead generators describe their services.
- 25. As with our review of lender websites, we also recorded how accessible information was in terms of the number of clicks (or 'page down' button presses) from the homepage needed to reach the information.

Preliminary observations

Information on the price of a loan

26. All of the lead generator websites that we reviewed provided price information for a representative example, in the form of an APR and the associated total amount repayable. In all cases these examples were based on 28- or 30-day loan terms. The representative examples given by each of the websites are set out in Table 5, below.

TABLE 5 Representative prices displayed by the lead generator

Lead generator Representative example

Purplepayday.co.uk Representative 2,758.17% APR

Representative example: £173.60 borrowed for 30 days

Annual interest rate of 434.9% (fixed). Total amount repayable by one payment is £226.68

Cash-wave.co.uk 1,737–4,214% APR representative

Representative example: borrow £200 for 30 days, payable £255.89 single payment, total

interest £55.89 Interest rate: 340%

Representative APR: 1,905%

Beeloans.co.uk Representative example: borrow £300 for 30 days, amount payable £375, interest £75,

Interest rate (pa)—1,737% APR (variable)

Icashadvance.co.uk Representative APR 1,737% (variable)

Representative example: borrow £300 for 30 days, amount payable £375, interest £75,

Interest rate (pa)—1,737% APR (variable)

Verymerryloans.co.uk Borrowing = £500

Interest = £86.63

Total to repay = £586.63

100dayloans.co.uk APR Notice

Our lenders may offer you a loan with an APR between: 392.01% & 780.31%

Cashuntilfriday.co.uk Representative example: £150 borrowed for 30 days

Total Interest payable £45

Total amount payable by one repayment is £195.00

Annual interest rate of 360% (Fixed)

2334% APR representative

Nowpayday.co.uk Representative 2,670% APR

Representative example: borrow £180 for 28 days. The total charge for credit is £52.2

Interest is fixed at a rate of £52.2 per £180 loan. The Total Repayable is £232.2

Kwikcash.co.uk Representative 2,670% APR

Representative example: borrow £500 for 28 days

Total in one repayment: £645 Interest rate pa 378% (fixed) Interest payable: £145

Piggypayday.co.uk 1,737% APR representative

Representative loan example: You borrow £250 for 30 days, total amount payable £312.50,

Interest £62.50, interest rate pa 1,737% (variable)

Source: CC. Websites accessed 4 December 2013.

27. In some cases, lead generator websites also provide further pricing information. For example, Purple payday provides the 'Approx monthly cost of borrowing £100' for three lenders (see Figure 8), and states on its homepage that 'Some lenders may charge you a late payment fee, which will vary between lenders and could range between £1 and £100'. Cash Wave provides estimates of the amount repayable for different amounts borrowed (see Figure 9).

FIGURE 8

Screenshot of Purple payday's 'Payday Comparison' table, on its homepage

Payday Comparison	PAYDAYUK	wonga	QuickQuid
How much can new customers borrow?	Up to £1000	£400	£1000
What is the maximum loan duration?	31 Days	35 Days	3 Months
What is the fee for fast online loan funding?	NO	£5.50	NO
Approx monthly cost of borrowing £100	£29.95	£38.21	£29.50
Could I repay in instalments?	NO	NO	YES
	APPLY NOW	APPLY NOW	APPLY NOW

Source: CC. Websites accessed 4 December 2013.

FIGURE 9

Screenshot of Cash-wave's 'How much can I borrow?' table, on its Charges page

How much can I borrow?

We offer loans from £100 up to £1000, please note first time customers generally will not get approved for over £400 on their first loan.

You Borrow	You Repay *
£100	£129.95
£200	£259.90
£300	£389.85
£400	£519.80
£500	£649.75
£600	£779.70
£1000	£1299.50

^{*} Amount based on a single payment on your payday and the actual amount payable may vary depending on the lender you are matched with.

Source: CC. Websites accessed 4 December 2013.

28. In all cases, the examples provided will not necessarily reflect the price that a customer will pay, as this will depend on the lender that they are actually matched with from the lead generator's panel.

Distinguishing between the websites of lenders and lead generators

- 29. Visually the homepages of lead generator websites look similar to those of the lenders themselves (presenting visitors with similar options and content). To some extent this may simply reflect the fact that both types of website are collecting payday loan applications.
- 30. None of the websites reviewed states that a provider is a lead generator in the company or product name or the title of the website. As recorded in Table 6, most sites present at least one slider, which—in a similar way to those on lender websites—invite prospective customers to indicate the size of the loan they are seeking and its duration.

TABLE 6 Incidence of sliders on lead generator websites that all visitors to select the value and length of a loan

Lead generator	Slider (amount)	Slider (term)
Purplepayday.co.uk Cash-wave.co.uk Beeloans.co.uk Icashadvance.co.uk Verymerryloans.co.uk 100dayloans.co.uk Cashuntilfriday.co.uk Nowpayday.co.uk Kwikcash.co.uk Piggypayday.co.uk	Yes (£1-£1000) No Yes (£50-£1000) Yes (£50-£1000) Yes (£50-£1000) Yes (£0-£1000) Yes (£100-£1000) Yes (£100-£750) Yes (£80-£500) No	Yes (1–45 days) No Yes (5–31 days) Yes (5–31 days) Yes (7–45 days) Yes (7–100 days) No (a 30-day loan is assumed) No No No

Source: CC. Websites accessed 4 December 2013.

- 31. All of the lead generator websites we reviewed inform visitors at some point that they are a lead generator. Different websites present this information with different prominence.
- 32. Most commonly this information is presented within text describing the product offered (often with a reference to the use of a 'panel of lenders' or the matching

process, although some lead generators also refer to themselves specifically as credit brokers on their websites). Table 7 reports how lead generators describe the service that they offer on their websites. As shown, there is considerable variability in how the lead generators describe the service they offer on their websites:

- (a) The most common approach from the sample is to talk in terms of 'matching' customers with a loan provider.
- (b) Several go further and refer to saving customers the need to search or shop around, which might be open to misinterpretation by customers.
- (c) Given the lack of detail that is provided, some customers may interpret the wording used on several of the sites (including the references to avoiding the need to shop around) as meaning that they were being matched with the 'best value' loans for them.

TABLE 7 How lead generators describe their services

I ead generator

Purplepayday.co.uk	We are one of the UK's leading payday loan websites. Established
	in 2007 Purplepayday utilises its award winning technology to find
	our customers the loan they are looking for as quickly and easily

How they describe their service

as possible

Cash-wave.co.uk One of the UK's leading loan brokers, Cash Wave has successfully

matched thousands of hard-working customers with short-term lenders. Each lender operates differently and fees, interest and APR will vary by lender between 1737 per cent to 4214 per cent

Beeloans.co.uk At Bee Loans, we use specialist systems to automatically talk to a

large panel of payday loan lenders and match your details with their criteria for payday loans. This means that finding a payday loan is quick, easy, and hassle-free. We take the stress away from finding a payday loan, as the process is 100 per cent online, and ensures you don't need to shop around—search over 40 payday

loan lenders with one click

Icashadvance.co.uk Our free service lets you search the market for a lender to match

your personal circumstances. Once we have done so, you will be redirected to their website, where the loan can be finalised. This ensures that rather than asking one lender elsewhere, you are

searching over 40 lenders with iCashAdvance.co.uk

Verymerryloans.co.uk* Why thousands of people choose Very Merry Loans.

> It's a totally new way of borrowing. Our unique technology gives you an online decision in minutes—and once approved, you get the money within 60 minutes. Very Merry Loans gives you smart little loans up to £1,000 for the unexpected. Our loans only go for

7-45 days, so you can't get stuck in long-term debt.

100dayloans.co.uk With our website there is no need to shop around for loans or

make a trip to the bank. We do all the searching for you with our optimised loan finder. In as little as 90 seconds, you could get

approved for a loan up to £1,000.

Filling out just one application grants you access to some of the most suitable loans available. 100DayLoanUK's service is aimed at getting you the most amount of money with the lowest rates available. Don't waste your time searching for the best deals

Cashuntilfriday.co.uk Cash Until Friday allows us to search a huge panel of lenders in

under one minute!

All you need to do is complete the online application form and we

will do the rest

NowPayday $\ensuremath{^{\text{TM}}}$ is an online payday loans matching service. We do Nowpayday.co.uk

our best to find you a lender that can offer you a payday loan and we do it for free. If you fill out our short & simple online application and you get matched with a lender, chances are you get your

payday loan in a few hours

By applying for quick cash through a broker like KwikCash you can Kwikcash co uk

save lots of time. We'll send your application to all our lenders in the same amount of time it would take you to fill in just one form. On top of that, because it's going to several lenders, you may even

have a much higher chance of being approved

Piggypayday.co.uk Does Piggyfinance.co.uk lend me the money?

No, Piggypayday.co.uk is a finance (sic) broker, for which we do not charge a fee unlike others, we have over 35 lenders on our books, who specialise in short term payday loan lending

Source: CC. Websites accessed 4 December 2013.

^{*}This site was further accessed 24 January 2014.

33. Few of the websites reviewed set out clearly the fact or nature of the financial remuneration that the generator earns for forwarding an application. Similarly, few of the websites provide visitors with any details of the lenders included on their panel.