

Activity	2019			2020				
	October	November	December	January	February	March	April	May
Remediation : (3.12 - bullet 2) Complete customer remediation relating to the current breaches <i>Note – remaining activity is for breach 2 only with agreed remediation for breach 1 complete</i>	Assessment and scope of remediation activity			Deliver customer comms and remediation				
Assurance Audit: (3.2) Independent Body appointed to undertake Assurance Audits of the procedures, processes and outcomes which constitute compliance with the Order	Workstream 1 – CCPI	Third party engagement	Conduct Audit and agree actions with third party Consultation with 3rd party and Nationwide personnel				} Finalisation of Assurance Audit and statement on actions	
	Workstream 2 – LPI	Third party engagement	Conduct Audit and agree actions with third party Consultation with 3rd party and Nationwide personnel					
	Workstream 3 – MPPI		Conduct Audit and agree actions Consultation with Nationwide personnel					
Reporting / CMA Updates : (3.12 bullet 6) Update the CMA on progress made in completing the actions set out in the Action Plan	(3.4) Confirm appointment of Independent Body	(3.3) Submit a description of the Assurance Audit Scope	Update on assessment and scope of Remediation activity	Update on Assurance Audit activity			(3.6) Submission of Final Report on 6 th April	(3.12 – bullet 2) report outcome of remediation activity
Assurance Audit Actions: (3.12 bullet 5) Deliver the actions to be carried out as part of the Assurance Audit by the Independent Body							3.12 – bullet 5 – to be provided with statement on actions, including proposed timescales together with future update plan	
Ongoing Assurance Activity: (3.12 bullet 1) Maintain processes and checking procedures to prevent future breaches	Ongoing quality assurance activity and controls							Audit activity to be reviewed following final report

Activity

- Independent Body appointed with scope and Terms of Reference (ToR) agreed

Workstreams

- Assurance Audit activity separated by Product and administrator.
- Third party engagement - (3.12 – bullet 3) Engage and share the draft action plan with all relevant third parties, including the insurer for CCPI, LPI and other PPI products and the administrators for LPI & CCPI

Remediation

- Remediation activity will be completed in tranches, with more complex cohorts, such as closed accounts, likely to take longer to remediate

Update to CMA Update to third party

