

Dear Sir/Madam,

International Personal Finance plc (IPF) welcomes the opportunity to respond to the Joint Committee of the European Supervisory Authorities' public consultation on the draft guidelines for complaints-handling for the securities and banking sectors.

Attached you will find a fact sheet about our business and you can find out more information on our website [www.ipfin.co.uk](http://www.ipfin.co.uk)

We have been working with our trade association, Eurofinas, on the submissions for this consultation, we understand that you will receive their input today. IPF supports the guidelines you have outlined and we welcome the emphasis on creating a level playing field to improve customer experiences. At IPF we believe we are already promoting the majority of what is contained in the guidelines and as part of our *Transformation for Growth* strategy we are addressing areas where we can improve further. In particular we are looking to develop our processes around route cause analysis, as although we believe we are thorough in identifying and resolving issues, more can be done to prevent certain situations arising.

With regards to our feedback for the consultation, we support the areas commented on by Eurofinas, in particular however, we would like to highlight the following areas :

1. The legal standing of the guidelines is important to recognise, although intended to create a level playing field they can have the opposite effect if some regulators assiduously follow the letter and spirit of the guidelines and others are less thorough in their application. The result can be a distorted playing field and confusion for business and policy makers.
2. Standardisation across EU countries is difficult, even when companies try very hard to create common processes across their markets. This does not always work because of specific reporting requirements by local regulators. In addition although we consider that we meet the requirements of even the most rigorous reporting, we do feel, at times, that in some countries reporting can be over burdensome for the type of complaint in question. It is therefore important that processes must be befitting of the nature of the problem.
3. We reiterate Eurofinas by highlighting that the consumer credit sector is thoroughly and robustly regulated by a wide range of legislation ;
  - The Consumer Credit Directive (CCD)
  - The Unfair Commercial Practices Directive (UCPD)
  - The Unfair Contract Terms Directive (UCTD)
  - The Directive on the Distance Marketing of Financial Services (DMFS) and
  - The Directive on Alternative Dispute Resolution for Consumer Disputes (ADR)

Each of these laws provides for the resolution of consumer detriment and caters for consumer rights and firms' obligations. The CCD is reviewed this year and we expect more on firms' obligation to customer service, and ensuring consumer protection.

At IPF, we understand our responsibilities towards our customer group and one example of this is the work initiated in 2007 to align the business voluntarily to the principles of Treating Customers Fairly (Supervised at the time by the UK's Financial Services Authority). This led to many improvements within product development, customer communication, complaints management, lending and collections. We have distributed over 2 million customer charters which clearly communicate to customers and agents the high standards they can expect from us. Our work continues in this area.

We are more than happy to provide further information should you have any questions or you feel that you would benefit from a call to understand our views further.

Thank you for the opportunity

Kind regards

Victoria

Group Public Affairs Manager

International Personal Finance plc