



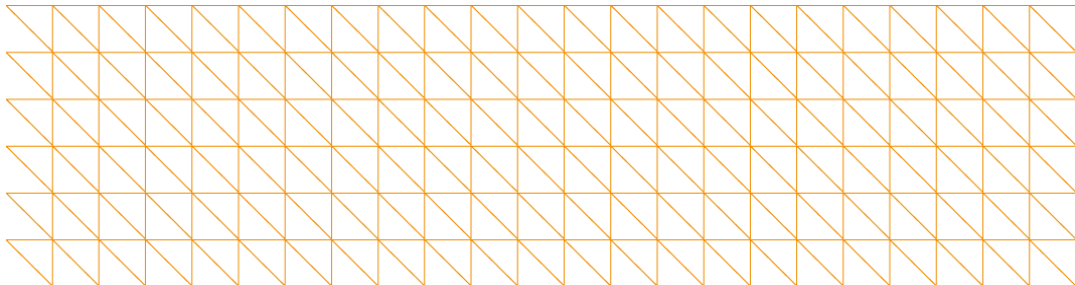
Ministry of  
**JUSTICE**

# **Debt Management Schemes – delivering effective and balanced solutions for debtors and creditors**

**Response to Consultation**

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Ministry of  
**JUSTICE**

## **Debt Management Schemes – delivering effective and balanced solutions for debtors and creditors**

**Response to consultation carried out by the Ministry of Justice, the  
Department for Business, Innovation and Skills (BIS) and the Insolvency  
Service, a BIS Executive Agency.**

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BIS and the Insolvency Service: [www.justice.gov.uk](http://www.justice.gov.uk), [www.bis.gov.uk](http://www.bis.gov.uk) and  
[www.insolvency.gov.uk](http://www.insolvency.gov.uk)**



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## Introduction and contact details

This document sets out a summary of the responses received to the previous Government's consultation paper, Debt Management Schemes – delivering effective and balanced solutions for debtors and creditors.

It will cover:

- the background to the report
- a summary of the responses to the report
- a detailed response to the specific questions raised in the report

The conclusion of this document will set out this Government's proposals following this consultation.

This report and the consultation paper are available on the websites of the Ministry of Justice, BIS and the Insolvency Service: **[www.justice.gov.uk](http://www.justice.gov.uk)**, **[www.bis.gov.uk](http://www.bis.gov.uk)** and **[www.insolvency.gov.uk](http://www.insolvency.gov.uk)**

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## **Background**

The consultation paper 'Debt Management Schemes – delivering effective and balanced solutions for debtors and creditors' was published on 18 September 2009. It invited comments on the way that debtors deal with their indebtedness and on whether there was a need for further Government intervention (above the licensing and supervisory role undertaken by Office of Fair Trading) in the operation of debt management plans, or whether the taking of other steps to make sure that debtors are protected and creditors' interests are safeguarded would be more appropriate.

The paper sought views in particular on the following options:

- continue with measures underway to raise awareness about current schemes and enforce existing rules with operators;
- improve current schemes by the introduction of best practice codes or other non-statutory regulation;
- commence the powers in Chapter 4 of Part 5 of the Tribunals Courts and Enforcement Act (TCEA) 2007 to introduce statutory debt repayment plans.

The consultation period closed on 18 December 2009 and this report summarises the responses, including how the consultation process influenced the final shape/further development of the policy/proposal consulted upon.

A list of respondents is at Annex A.

## Summary of responses

1. A total of 57 responses were received from the following sectors representing around 15% of the papers distributed.
2. We are grateful to all those who responded.
3. The table below summarises the responses received by sector.

Sector	Number
Creditors	23
Debt Management Scheme Operators (DMSOs)  (from both the commercial and free to client sectors)	13
Advice Providers	9
Others  (including individuals, the judiciary, other Government Departments, local authorities and Insolvency Practitioners).	13

4. Of these, 4 responses have been omitted from the detailed quantitative analysis because they did not answer the specific questions that were asked. However, these responses have been included in the general qualitative analysis.
5. A further 2 responses have been excluded from the quantitative analysis due to one being limited to information regarding advertising control mechanisms only and the other not addressing the subject of the consultation at all.
6. In this paper, a debt management scheme operator is one that provides advice, sets up the debt management plan, negotiates payments with creditors and distributes payments to creditors.
7. Responses were analysed against the following objectives as detailed in the consultation paper:

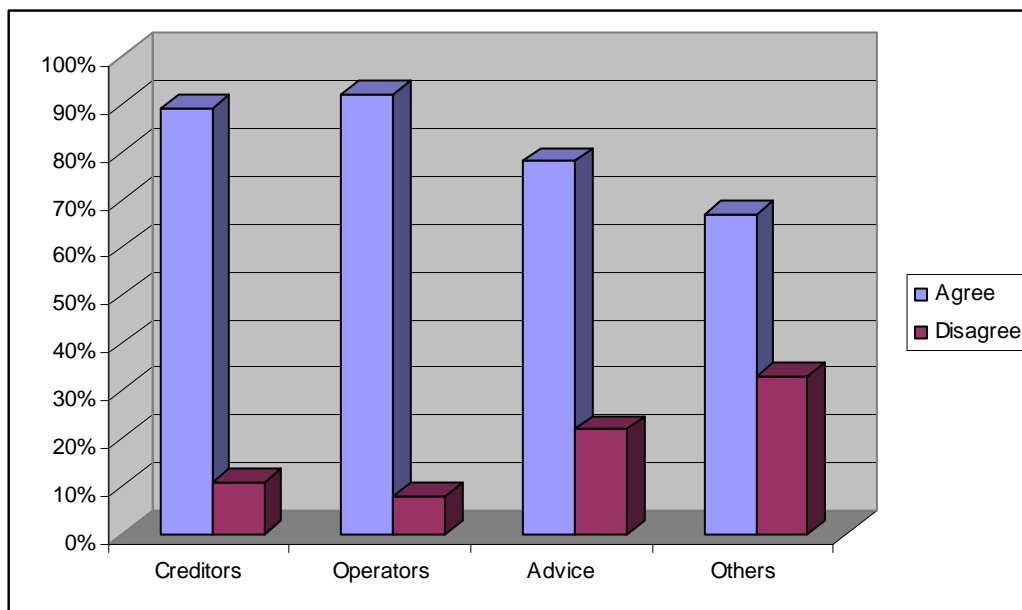
- helping people who could, but are struggling to, repay their debts;
  - ensuring that fees charged by debt management schemes operators are reasonable and consistent;
  - ending the practice of some creditors adding interest to debts included in a repayment plan;
  - preserving the best features of the current debt management industry;
  - ensuring that needs of debtors, creditors and operators are correctly balanced; and
  - ensuring that debtors are aware of the range of options available to them and are advised on the most appropriate and sustainable solution(s) for their circumstances.
8. The consultation was widely welcomed as providing an opportunity for all interested parties to contribute to a constructive dialogue on a topic that is of great significance in the current credit market.
9. It is clear from the responses received that there is no strong consensus in favour of any of the options. In strictly numerical terms, the most favoured option was Option 2 - "Improve current schemes by the introduction of best practice codes or other non-statutory regulation". However, a substantial proportion of the responses from the advice sector did not support this option and there were conflicting responses from the other sectors as well.
10. For example, all respondents supported continuing the activities detailed in Option 1, some respondents felt that this should be supported by some or all of the measures contained in either Options 2 or 3, with some proposing a combination of all three options.
11. It was clear from the responses that the majority of debt management scheme (DMS) operators from the commercial sector felt that the Government's objective of 'ensuring that fees charged by debt management schemes operators are reasonable and consistent' could be achieved without the need for fees and charges to be capped.
12. The majority of respondents recognised that there are issues with the current system of debt management plans that needed attention. However, they disagreed on the best way to deal with those issues and recognised possible tensions in areas such as:
- debtors who can pay or can't pay;
  - providers being from both the commercial and free to client sectors;

- the quality of providers, some of whom are excellent and some who are not;
  - debtors looking for a long term or short term solution: and
  - views on who should fund plans i.e. debtors, creditors or both.
13. There was considerable interest in introducing measures that would focus on those organisations providing a poor service without damaging those that already offer an excellent service.
14. A number of respondents mentioned the lack of large scale empirical research into debt management plans. They viewed such research as essential if workable solutions to the issues raised are to be achieved. While there was no general consensus on what such research should cover, areas suggested included –
- a fundamental review of debt remedies;
  - a market study of debt management schemes (DMS); and
  - obtaining accurate statistics and evidence relating to DMS.

## Responses to specific questions

### Q.1: Are these objectives reasonable and attainable?

15. We received 47 responses. Overall, 87% of interested parties said that the objectives were reasonable and attainable. This included 92% of DMS operators, 89% of creditors, 78% of the advice sector respondents and 67% were other respondents.



16. In their response the Debt Managers Standards Association (DEMSA) said:

*“Yes, they represent sound principles which would deliver greater certainty and confidence.”*

Advice UK commented:

*“We fully support the objectives outlined in paragraph 43 of the consultation paper. We think that they are entirely reasonable. We also think that they are attainable.”*

Payplan replied:

*“Yes. When a consumer first contacts a debt advice provider they usually do so following a trigger such as a loan application being refused, defaulting on their mortgage payment or the threat of legal action from a creditor. They are therefore typically very stressed and looking for a quick solution. As a result, consumers are likely to be easily influenced by what they perceive as expert advice and are unlikely to shop around for the solution most suitable to their needs. We are therefore very encouraged by the opportunity to ensure that these vulnerable consumers are receiving best advice through a solution that*

*genuinely addresses their needs. In our view these objectives are therefore both reasonable and attainable.”*

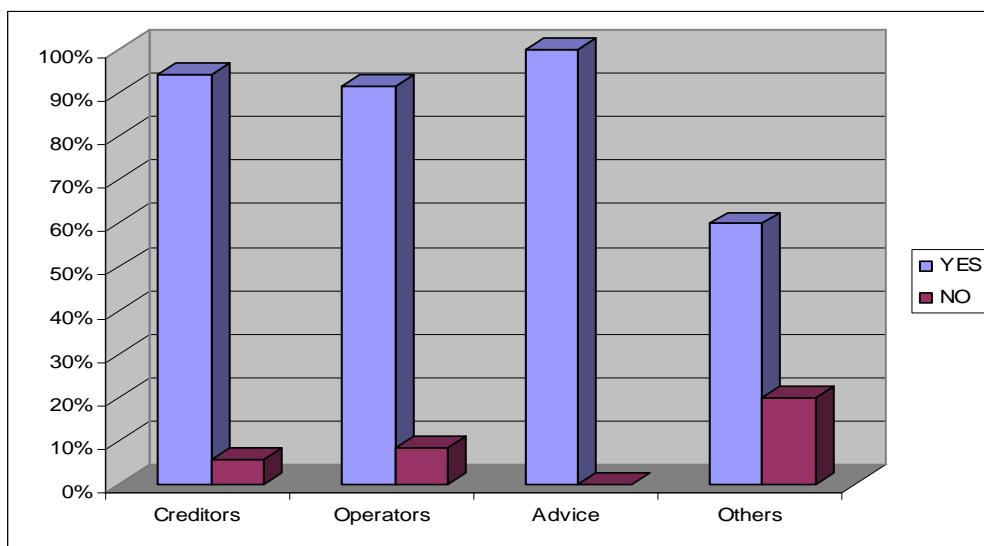
17. A small number of respondents disagreed with the proposal. This included 2 creditors who disagreed with the suggestion that interest and charges should be automatically stopped and one DMS operator who did not agree that fees and charges should be capped. Others took the view that while the objectives might be reasonable they were unlikely to be delivered by the options contained in the consultation paper alone.

In their response, AIC said:

*“Yes. But not by choosing options 1, 2 or 3 alone.”*

#### Q.2: Is there evidence of problems in the current system?

18. We received 47 responses. Overall, 90% agreed that there was evidence of problems in the current system. This included 92% of DMS operators, 90% of creditors, 89% of respondents from the advice sector and 83% of other respondents.



19. Key issues/concerns that were mentioned were:

- the variable quality of advice;
- differing attitudes amongst creditors to debt management plans (DMPs);
- the variable quality of advice and service amongst and both the fee charging and free-to-client sectors; and,
- the lack of agreed standards of advice and administration.

In their response Payplan commented:

*“Poor regulation means many consumers are currently receiving poor and inappropriate advice. This is evidenced in recent research conducted by the Money Advice Trust and in anecdotal feedback from creditors. Payplan clients have also stated that they have experienced ‘persuasive’ or ‘pushy’ sales techniques.”*

The Debt Resolution Forum said:

*“Fee charging debt management companies are still of variable quality, though less so than previously. However, to create an appropriate level of confidence in the industry appropriate standards of advice and administration must be created and maintained.*

*Creditors do not adopt a uniform attitude to DMPs – raising costs and diminishing performance.*

*The non fee-charging sector also provides very variable standards of advice and administration – and has a lack of capacity that is unlikely to be addressed in the near future. Raising standards of advice, for non fee-chargers is likely to be costly, as are the relevant systems to enable them to collect and distribute monies to creditors.”*

20. A small number of respondents, including 2 DMS operators and 2 Insolvency Practitioners (included in the other respondents group) took the view that while there may be issues with the operation of the current system, there was no empirical evidence about the precise scale of the problem.

Paymex said:

*“...despite the fact that there are many tens of thousands of DMP’s in operation, the statistical evidence of customer complaints is negligible.”*

**Q.3: If so, how significant and frequent are these problems?**

21. There were 50 responses to this question. 74% agreed that there were significant problems in this area. These included 65% of creditors, 83% of DMS operators, 78% of respondents from the advice sector and 83% of other respondents. Although most respondents did not provide specific examples, those who did were generally concerned about fees, advice and the use of the Common Financial Statement (CFS).

In their response, Citi said:

*“There is an enormous need for a regulated market to prevent the continued high level of inconsistent and poor advice provided to financially disadvantaged and vulnerable customers.”*

Debt Advisory Line LLP said:

*“Very significant especially in terms of debt solutions, companies can continue to give poor advice when they offer only one solution...”*

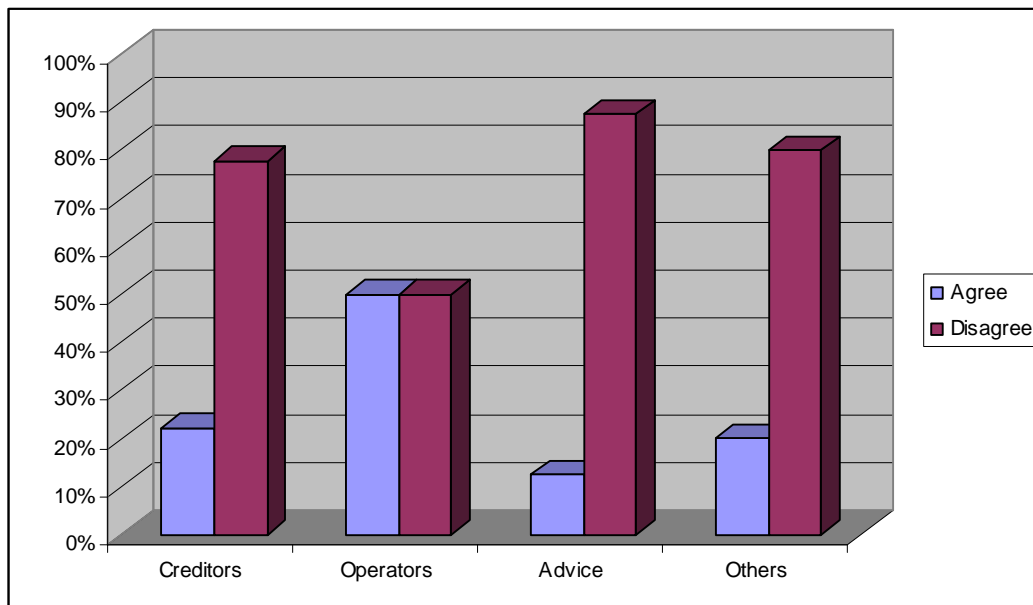
22. The general view of those who did not agree that the problems were significant and frequent was that there was a lack of empirical evidence about what was going on.

The Insolvency Practitioners Association commented:

*“There are no adequate statistics available about the performance of debt management schemes.”*

**Q.4: Would this approach meet any/all of the objectives in paragraph 43?**

23. A total of 39 responses were received to this question, with 74% taking the view that option 1 by itself would not meet all of the government’s objectives. This included 78% of creditors, 88% of respondents from the advice sector, 50% of DMS operators and 80% of other respondents. A number of these seem to have misunderstood the question as their comments indicate that they agreed that this approach would deliver some of the government’s objectives. However, they also took the view that although it was possible that some improvements would be delivered there would be nothing to ensure the provision of quality advice, control fees and stop interest and charges being added, and there was support for increased enforcement activity by the OFT.



In its response Lloyds stated:

*“We would prefer to see a strengthening of existing good practice and eradication of poor practice within the advice sector, particularly among fee chargers, and do not believe that wholly voluntary participation in industry codes will achieve this...”*

Paymex commented:

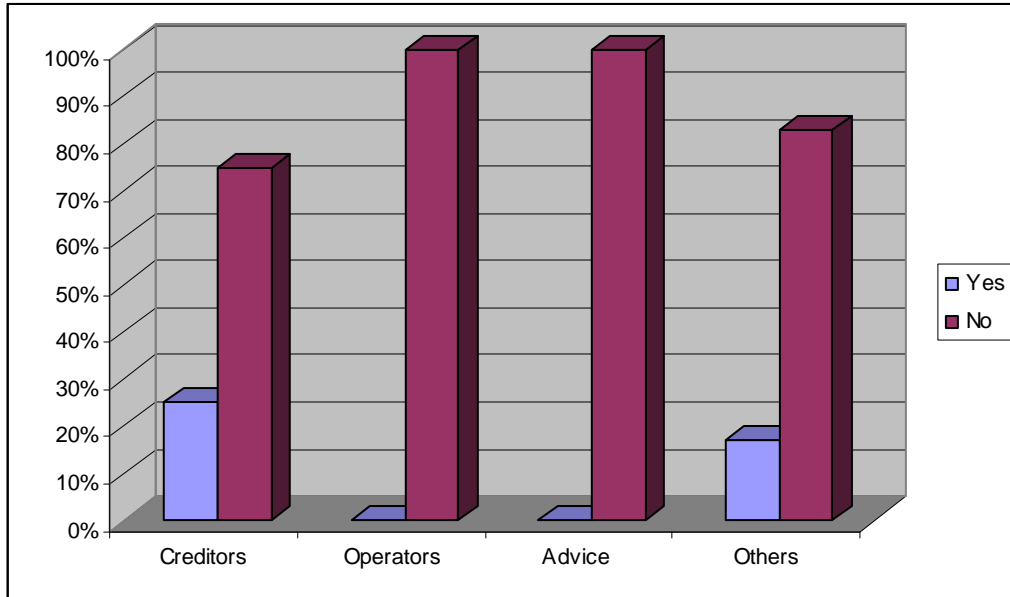
*“We are keen to see increased levels of enforcement action against those firms who do not share the commitment to TCF, good practice, appropriate advice and the highest levels of service...”*

The Finance and Leasing Association commented:

*“There are problems in relation to advice, the level and transparency of fees and consistency of approach amongst DMP providers. We believe that additional controls are necessary...”*

**Q.5: Should the Government follow Option 1 and do nothing beyond measures underway?**

24. We received 45 responses. Overall, 87% agreed that the current measures being taken forward would not achieve the Government’s objectives. This included all respondents from the advice sector, all DMS operators, 75% of creditors and 83% of other respondents. The general view was that there was nothing in the current work underway that would address key issues such as the provision of neutral advice, the charging of fees and the sustainability of plans.



The Debt Managers Standards Association said:

*“Option 1 will happen anyway, the extent to which the proposed new measures will improve the current situation remains to be seen, regardless, option 1 alone cannot achieve all of the objectives identified.”*

The British Banking Association replied:

*“We do not believe that pursuing existing measures by themselves would be sufficient to tackle the problems effectively, especially if this is not supported by adequate supervision/enforcement of DMCs.”*

Payplan commented:

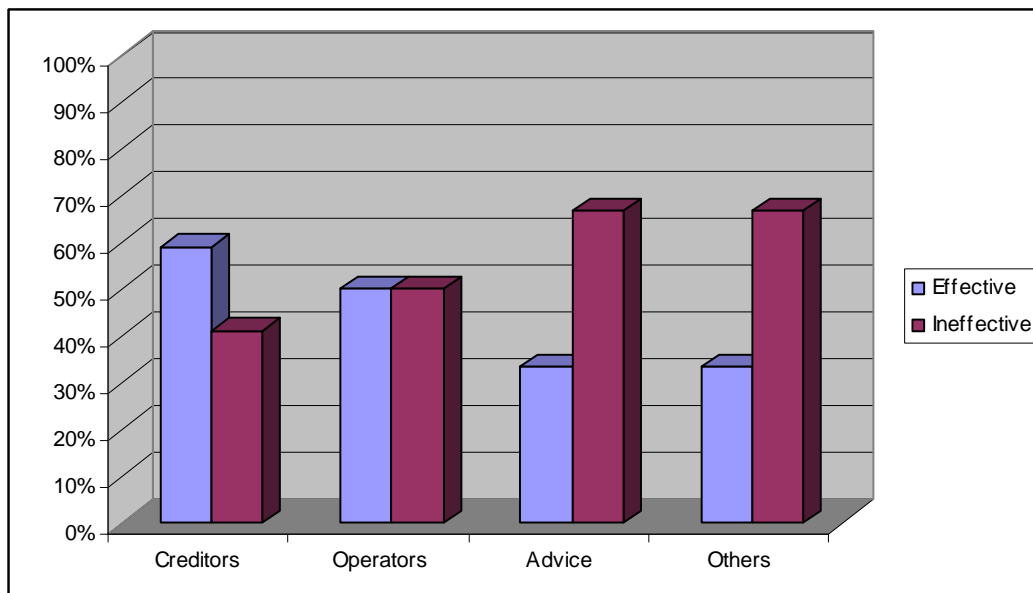
*“While option 1 lacks cost and complexity it also misses the opportunity to overhaul a system in which creditors and many consumers lack confidence.*

*If the status quo remains, many of the difficult questions will not be addressed. Issues surrounding balanced advice, realistic income and expenditures and sustainability need intense scrutiny. Decisive action is also required with regards to interest and charges to allow consumers a realistic chance of repaying their debts.”*

25. Although a small minority of respondents stated in their response to this question that no other steps should be taken, with the exception of 1 creditor, each also supported another option.

**Q.6: How well are the existing codes of practice working?**

26. A total of 36 respondents addressed this question. Overall respondents were evenly split with a small majority of creditors (59%), half of DMS operators and a minority of respondents (33%) from both the advice sector and other respondents group agreeing that the existing voluntary codes were working well. The balance of respondents, including majorities of the respondents from the advice sector and the other respondents groups disagreed. Generally it was noted that the existing voluntary codes had only been in place for a relatively short period of time and that currently only a limited number of DMP providers were members. As a result a number of respondents considered that it was too early to tell how effective these might be.



Advice UK said:

*“The majority of smaller fee-charging firms are therefore not subject to a code of practice. Anecdotal evidence suggests that most of the bad practice within the fee-charging sector is concentrated in these smaller firms.”*

Santander commented:

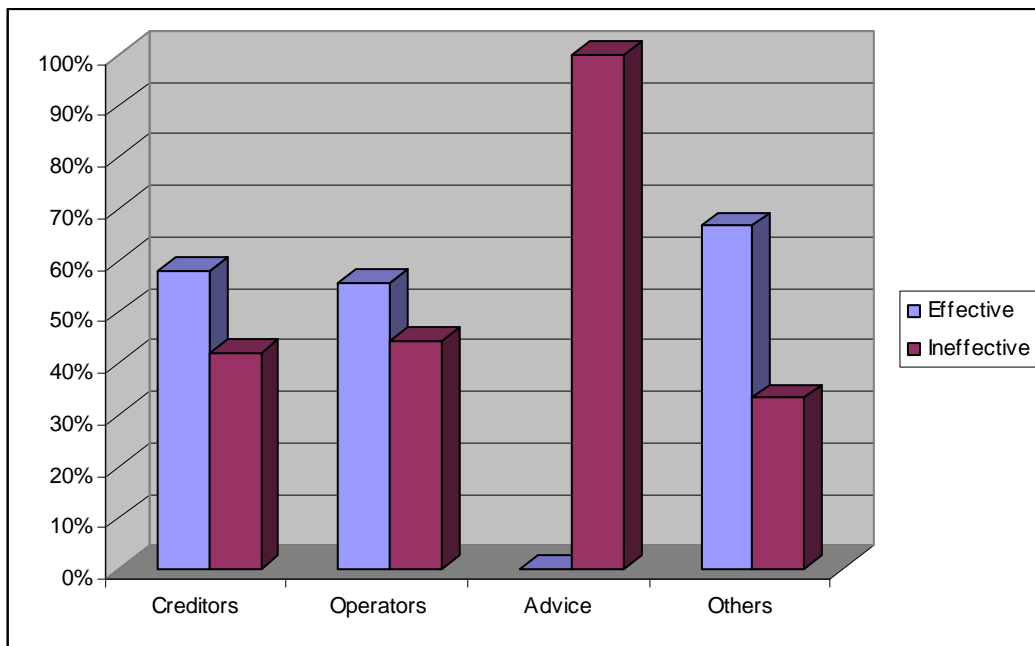
*Self-regulation is not working as few DMCs belong to the recognized trade bodies. The trade bodies’ codes of conduct were designed by DMCs and so do not address all of the issues creditors may have. With improvement and with greater membership, the existing codes could work.”*

In its response the National Australia Group Europe Limited said:

*“I perceive poor credibility. The Debt Management Guidance of the Office of Fair Trading (OFT) is six years old, and the voluntary codes of conduct are only tested reactively, on the basis of actual complaints being investigated.”*

**Q.7: How effective is the enforcement of existing codes of practice?**

27. We received 37 responses. Of these, 49% agreed that enforcement was effective, including 58% of creditors, 56% of DMS operators and 67% of the other respondents group. However, all respondents from the advice sector along with substantial minorities of respondents from both the creditor and DMS operator groups disagreed. Generally it was noted that the existing codes had only been in place for a relatively short period of time and that currently only a limited number of DMP providers were members. As a result, while a number of respondents took the view that there were improvements that could be made, some also considered that it was too early to tell how effective these might be.



Paymex commented:

*“Both DRF and DEMSA have independent complaints procedures which investigate alleged breaches of the respective codes. The number of complaints made is small (e.g. 4 to DEMSA in 2008) compared to the total number of DMP’s in existence.”*

The Civil Courts Users Association said:

*“Wholly inadequate. Only those DMC’s with a good business model and the need to maintain their good reputation are engaging through the code. Consequently, DMC’s which are the majority, place less credence on complying with the codes.”*

Advice UK said:

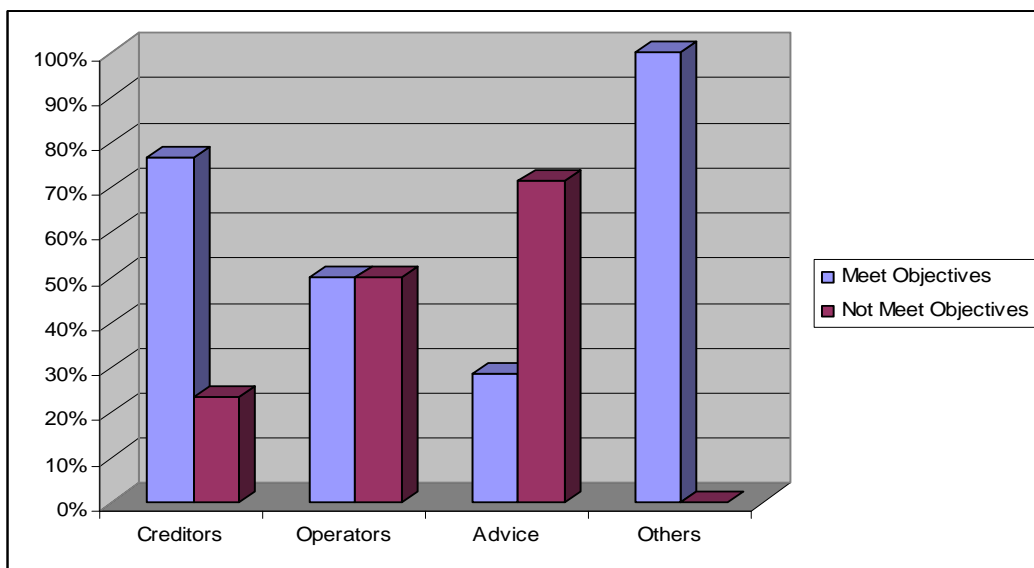
*“...most fee-chargers are not covered by a code of practice; the issue of effective enforcement does not therefore arise for the majority of the sector.”*

**Q.8: Are there any features which you would like to see as part of the existing codes of practice?**

28. A total of 39 respondents addressed this question. Of these 87% indicated that there were specific features that they would wish to see included in any code of practice. While there were some differences depending on which sector the response came from, common themes included quality advice, kite-marking, standard income and expenditure assessment tool, compliance monitoring and enforcement and transparent fees.

**Q.9: Would this approach meet any/all of the objectives in paragraph 43?**

29. There were 39 responses to this question. Of these 64% agreed that this approach would meet the government’s objectives. This included 76% of creditors, half of DMS operators, all those in the other respondents group but only 29% of respondents from the advice sector.



30. The general view of those agreeing with this question was that reliance on codes of practice could work provided that all creditors and providers were signed up.

Northern Rock commented:

*“Provided all parties followed the letter and spirit of the code(s) and there was a suitable Governance structure in place, which could enforce the code.”*

Lloyds said:

*“Currently, we feel that Option 2 would come closest to meeting the objectives in para 43 although it is recognised that it would not be effective unless operators and creditors were compelled to follow the protocol approach.”*

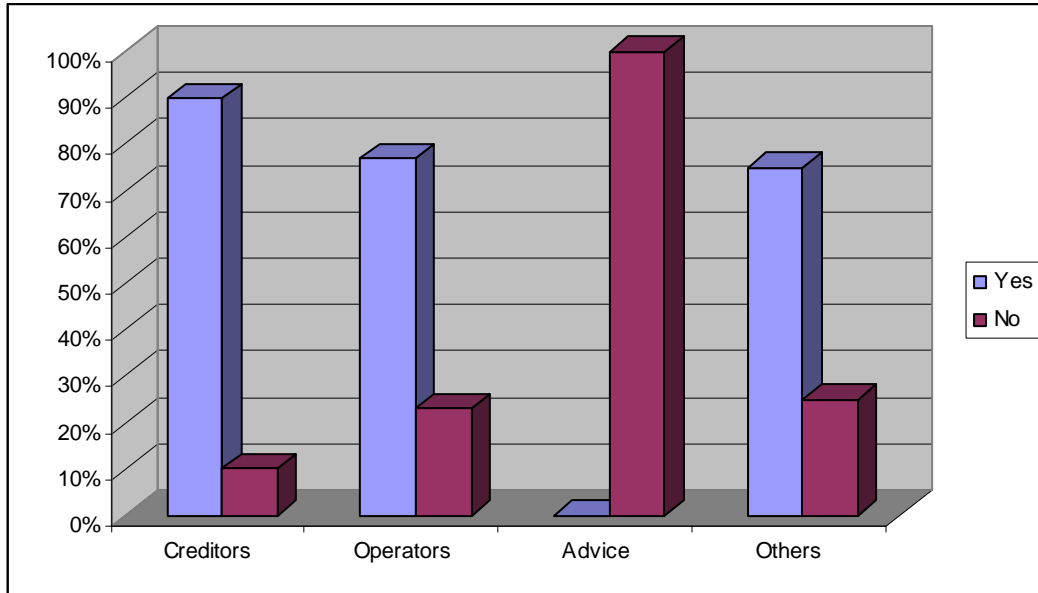
31. Those disagreeing were concerned that any voluntary codes would not address issues around fees and, in particular, the addition of interest and charges.

The Fairpoint Group plc replied:

*“This approach would only meet objective 4 “preserving the best features of the current debt management industry”.*

**Q.10: Should the Government follow Option 2 and promote a code of practice/non-regulatory approach?**

32. We received 47 replies. Overall, 72% agreed, to some extent or other, that the Government should follow Option 2. This included 90% of creditors, 77% of DMS operators, and 75% of other respondents but no respondents from the advice sector. The general view of those supporting this proposal was that it would improve the work currently underway, provide a degree of flexibility and would fit well with the OFT’s guidance on debt management.



The British Bankers' Association said:

*“Yes – in combination with option 1 of strengthening and re-enforcing existing measures already underway.”*

R3 replied:

*“Option 2 seems to present a better way forward than Option 1. We hold this view because activity under Option 1 will happen regardless, and Option 2 provides additional scope for improvement.”*

In their response TDX Group Limited said:

*“A code of practice maintained in the aforementioned structure should automatically be promoted by the Government via the OFT.”*

33. Those opposed to this Option generally took the view that while option 2 had some benefits, such as flexibility, that should be retained as far as possible, self-regulation and codes of practice were inevitably piecemeal and lacked the necessary effective sanctions to ensure appropriate behaviours.

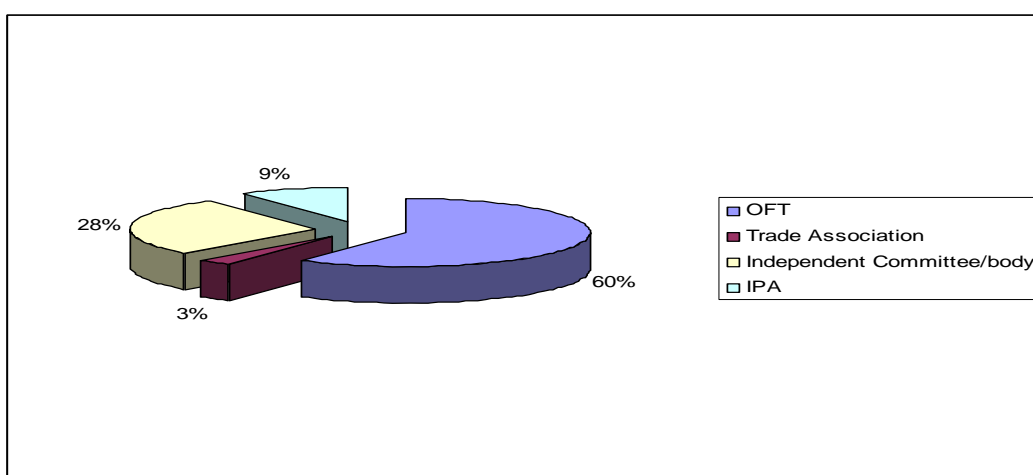
In their response Payplan commented:

*“Continuing to rely on self regulation and codes of practice again misses a huge opportunity to address widespread and high impact problems across the industry.*

*Self regulation does not have the necessary teeth. Accepting the status quo of self regulation, with its poor track record, legitimises poor practices and unethical providers.”*

**Q.11: How should such a code of practice/BPM be monitored and by whom?**

34. In total, 44 responses were received. Respondents to this question agreed that independent oversight was essential and made a variety of suggestions, including the current Trade Associations, an independent committee and the Insolvency Practitioners Association. However, 60% of respondents took the view that the OFT, with its existing involvement in debt management was the most appropriate body to undertake such a role.



The Civil Courts Users Association commented:

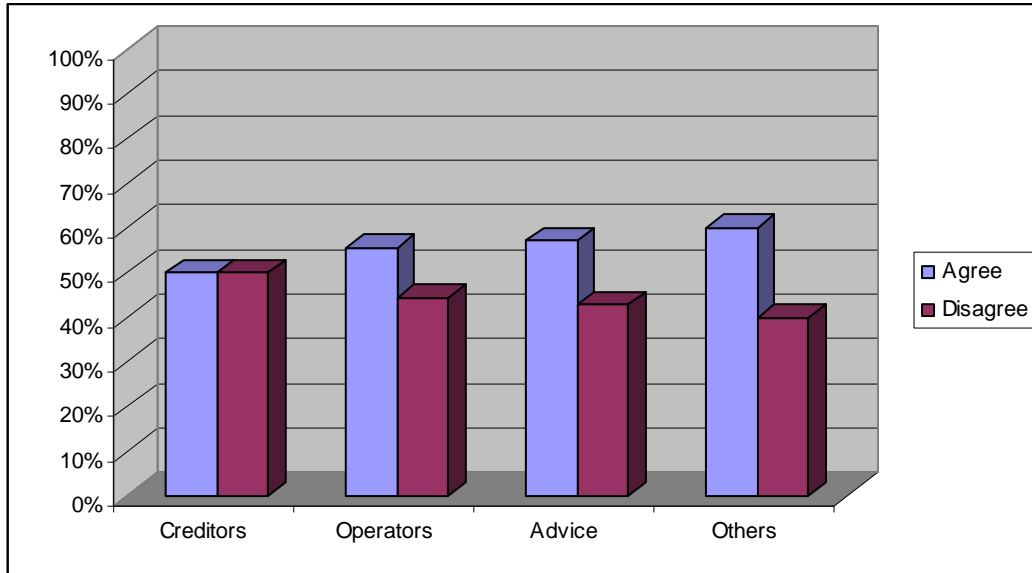
*“OFT – There needs to be a designated department to follow through on complaints.”*

The Finance and Leasing Association said:

*“We consider that an existing supervisory framework for the debt management sector exists in the form of the OFT.”*

**Q.12: Would this approach meet all of the objectives in paragraph 43?**

35. We received 39 responses to this question, with 54% agreeing that option 2 would meet the government’s objectives. This included 57% of respondents from the advice sector, 56% of DMS operators, 60% from the other respondents group and 50% of creditors.



Citizens Advice commented:

*“Citizens Advice believes strongly that the Government should follow Option 3 and bring into force the statutory debt management provisions of the Tribunals, Courts and Enforcement [Act] 2007. We believe it will meet all the objectives set out in paragraph 43 of the consultation...”*

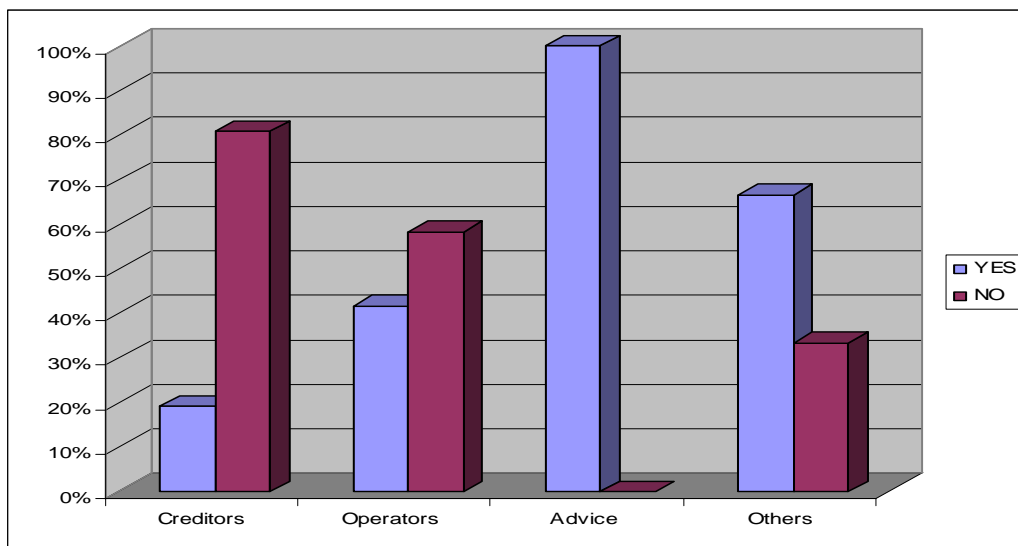
36. Half of the creditors who responded and substantial minorities from the other groups disagreed.

The BBA said:

*“No. We feel that the concerns/issues/problems with DMP’s are not around the product but more about the behaviour of operators. Therefore, a regulated product would not provide the appropriate solution to tackle these activities/practices, particularly as rogues will continue to flaunt the rules despite the measures in place without an effective regulatory regime.”*

**Q.13: Should the Government follow Option 3 and introduce a regulatory approach?**

37. We received 48 replies. Overall, 56% of interested parties were opposed to regulation in this area. These included 81% of creditors, 58% of DMS operators and a third of those from the other respondents group but none from the advice sector.



38. Those not in favour of regulation noted the lack of detailed information about the way in which the debt management sector currently operates and were generally concerned that it would limit the industry’s flexibility to tailor products to meet different circumstances.

The Credit Services Association said:

*“The government should not follow option three as this would not offer the flexibility needed to ensure plans suit the circumstances of the debtors and it would not be more beneficial than option two.”*

R3 stated:

*“Without knowing more about the size and shape of the debt management industry, or the problems within it, we feel that regulation would be an unwise step.”*

39. A sizeable minority of respondents, including all of those from the advice sector supported regulation. This was generally on the basis that this was the best way to effectively balance the needs of debtors, creditors and providers, while ensuring that debtors could be protected from unfair practices by creditors.

Payplan said:

*“In a growing market that deals with vulnerable consumers relying on ‘expert advice’ it is important that the opportunity to provide much needed protection is not missed. Whichever option is selected, the impacts will have far reaching effects on consumers, providers and creditors. We believe that Option 3 most effectively balances these needs.”*

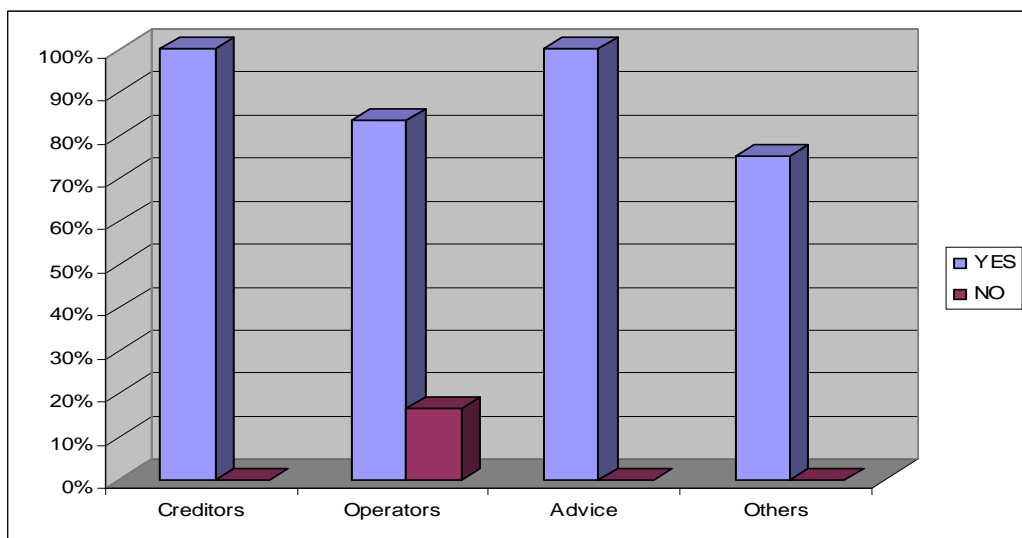
In their response Citizens Advice commented:

*“Citizens Advice believes strongly that the Government should follow Option 3 and bring into force the statutory debt management provisions of the Tribunals, Courts and Enforcement Act 2007. We believe it will meet all the objectives set out in paragraph 43 of the consultation as well as:*

- *protect debtors from unfair practices from creditors when they pay what they can objectively afford towards their debts; and,*
- *provide an element of debt relief.”*

**Q.14: If option 2 or 3 is introduced, should advice, including the use of a comparison table, be provided as a requirement?**

40. We received 40 replies. Two DMS operators and one respondent from the other respondent group did not support this proposal because it was felt that good quality advice was more important than a simple comparison table. However, overall, 93% agreed with the proposal, with large majorities from all sectors. The general view was that holistic and neutral advice should be provided so that debtors were aware of the advantages and disadvantages of all the options and could make informed decisions about which option to follow. It was also felt that a comparison table would provide creditors, in particular, with clear information about what had been discussed and the relative advantages and disadvantages of each option.



In their response the British Banking Association said:

*“We believe that it is essential that debtors are aware of the range of options available to them and are advised on the most appropriate and sustainable solution for their circumstances.”*

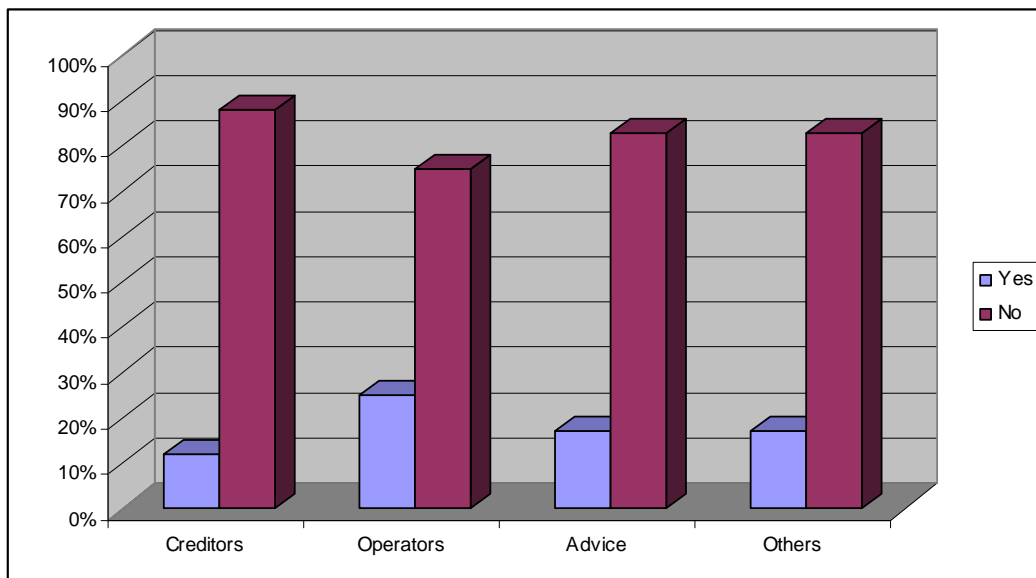
Advice U.K. commented:

*“In our view, it is essential that holistic and independent advice on all the options available to the debtor is provided as a requirement. This would ensure that a regulated plan is discussed as an option and the debtor can make an informed decision about whether it is in their overall and long term interest.*

*We think that comparison tables are useful and can supplement and reinforce advice but are not a substitute for independent advice.”*

**Q.15: If option 2 or 3 is introduced, should there be a limit on the total amount of debt included in a plan?**

41. We received 41 replies. Overall, 83% of respondents agreed that there should not be a total debt limit. This included 83% of respondents from the advice sector, 88% of creditors, 75% of DMS operators and 83% of other respondents. The general view was that any limit would inevitably restrict flexibility and exclude some debtors who needed the support from accessing a DMP.



The Finance and Leasing Association said:

*“A limit would lead to reduced flexibility for creditors, debt management companies and customers.”*

Advice UK commented:

*“We think that it is important that regulated plans are as inclusive as possible to ensure that as many people as possible can access them. For this reason, we do not favour a limit on the total amount of debt that can be included.”*

42. Of the interested parties who felt that there should be debt limit, 33% were DMS operators, 17% were other respondents and 11% were creditors. 22% of creditors were non-specific. On the whole, respondents who supported the introduction of a debt limit said that this was necessary to protect creditors.

The Credit Services Association said:

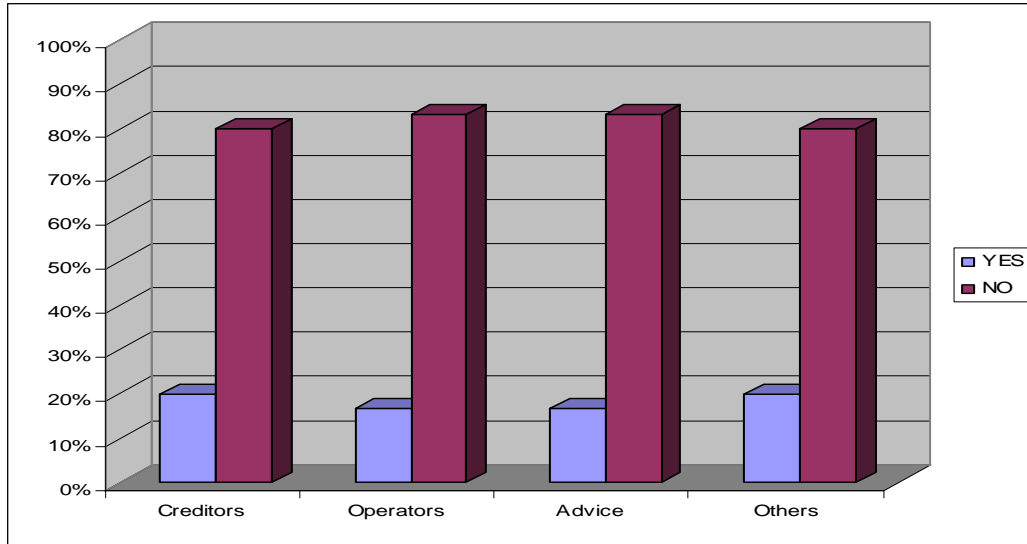
*“A total debt limit should be included as it is likely that debtors with large debts to multiple creditors would only offer minimal payments which in turn would harm creditors disproportionately.”*

**Q.16: If yes, what should the debt limit be?**

43. A total of 40 respondents addressed this question. Given that the majority of respondents did not support the introduction of such a limit, most did not propose a particular figure. Of those that did, 3 respondents from the advice sector suggested a figure of £75,000, one DMS operator suggests £50,000 and a creditor suggested that there should be a variable individual limit, based on the income of the particular debtor.

**Q.17: If option 2 or 3 is introduced, should plans have an asset cap?**

44. We received 43 responses. Overall, 81% of respondents did not support the introduction of an asset cap. This included 83% of respondents both from the advice sector and DMS operator groups, and 80% of both creditors and other respondents. Overall, as with the response to the proposed total debt limit, respondents were generally concerned that this would reduce flexibility and restrict access.



The Debt Resolution Forum commented:

*“An asset cap would restrict access in some circumstances and would increase costs by introducing a requirement for valuation. The absence of an asset cap makes the procedure more flexible and able to respond to changing market/economic conditions.”*

Citizens Advice commented:

*“Citizens Advice believes that it would be simpler if there were no asset cap for the statutory debt management scheme.”*

45. In contrast, those who supported the introduction of an asset cap, which included 17% of both DMS operators and the advice sector, and 20% of both creditors and the other respondents group, took the view that it was important that debtors with assets should generally be expected to use any equity to pay the debt.

The Credit Services Association replied:

*“An asset cap should certainly be included. If debtors are to be protected from enforcement it should be debtors without assets. Those with debts and equity in property should be open to action which uses this equity to pay the debts. Debtors entering into credit agreements realise this is an option and it is not unfair to expect payment from a customer’s equity.”*

**Q.18: If yes what should the asset limit be?**

46. Only 4 respondents, one from each group, actually provided suggestions on the figures that could be used. Of these, 3 proposed an asset cap of £5000

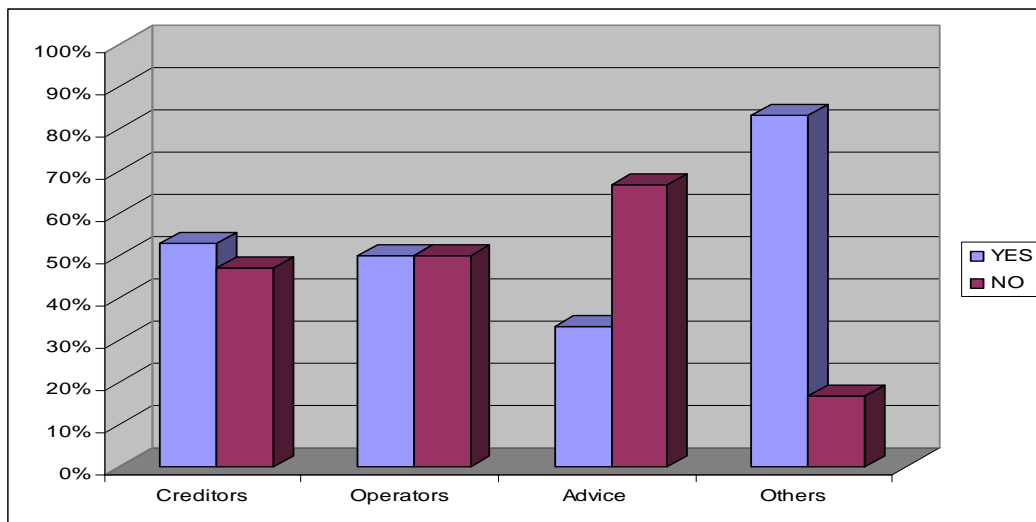
with one, from the other respondents group, proposing that the cap should be £2000.

**Q.19: If an asset cap is introduced, how should assets be valued?**

47. Given the general response to Question 17, only 20 replies addressed this issue. The general consensus was that this would be difficult and would invariably add to the management costs of any scheme. Although not all respondents made suggestions about specific mechanisms that could be used, those that did made a variety of proposals including using values that could be achieved at auction to following the current practice used in insolvency.

**Q.20: If introduced, should statutory debt repayment plans be time limited (option 3) or should a time limit be included in a code of practice (option 2)?**

48. We received 41 responses. There was no clear consensus with 54% of respondents agreeing with the introduction of a statutory time limit, compared to 46% who favoured its inclusion in a code of practice.



49. Those supporting the introduction of a statutory time limit included 53% of creditors, 50% of DMS operators, 33% of respondents from the advice sector and 83% of other respondents. The general view amongst this group was that it was essential to provide debtors with 'light at the end of the tunnel' and that this would increase their adherence to a plan.

Citizens Advice said:

*“We agree that statutory debt repayment plans should not be allowed to continue indefinitely. This is unfair to debtors and creditors. Debtors need light at the end of the tunnel.”*

In their response the Credit Services Association commented:

*“A time limit is desirable as it has been proven to increase a debtor’s adherence to the scheme.”*

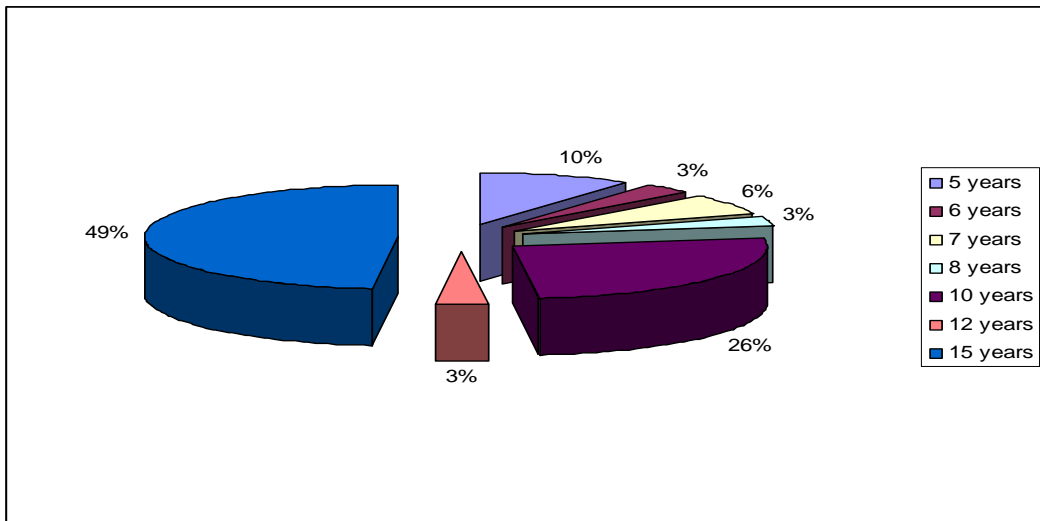
50. Of the respondents who felt that any time limit should be included in a code of practice only, 67% were from the advice sector, 50% were DMS operators, 47% were creditors and 17% were other respondents. In general, these respondents said that debt repayment plans should not be time limited because it may exclude some debtors from accessing a plan.

The Consumer Credit Counselling Service commented:

*“No. A formal time limit may exclude debtors who would benefit from a [plan].”*

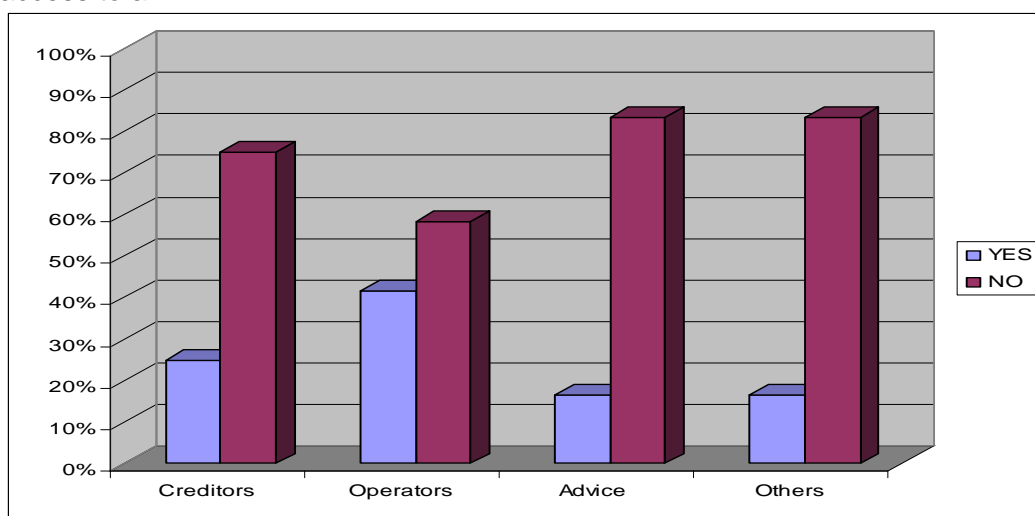
**Q.21: If yes, what should the maximum limit be?**

51. Although 50% of respondents to Question 20 supported the introduction of a time limit, not all of these suggested a specific limit. Those that did ranged from 5 to 15 years, with 15 years being the most favoured option.



**Q.22: If option 2 or 3 is introduced, should there be a minimum payment rate?**

52. We received 44 replies. 73% did not support the introduction of a minimum payment rate. These included 83% of respondents from the advice sector, 75% of creditors, 58% of DMS operators and 83% of other respondents. Overall, the main reason given by respondents for opposing this proposal was that a minimum payment rate would result in less flexibility and restrict access to a DMP.



In their response Advice UK said:

*“We are opposed in principle to the requirement of a minimum repayment because we think it is important that regulated plans are as accessible as possible.”*

The Debt Resolution Forum commented:

*“To introduce a minimum payment rate would make the statutory debt management plan less flexible, and, possibly, restrict competition – as some, more efficient, operators may be able to administer plans at a lower level of contribution than others.”*

The Finance and Leasing Association stated:

*“Minimum payment rates could exclude the most needy customers.”*

53. The minority of respondents (27%) who supported the introduction of a minimum payment rate included 42% of DMS operators, 25% of creditors, and 17% of both the advice sector and other respondents. Generally, the respondents who supported this proposal took the view that a minimum payment rate, ensuring at least a minimum level of return was appropriate given the concessions that creditors would be forced to make in other areas.

The Debt Managers Standards Association commented:

*“Because of the guaranteed concessions a minimum payment rate would be appropriate.”*

**Q.23: If yes, what should the minimum repayment be?**

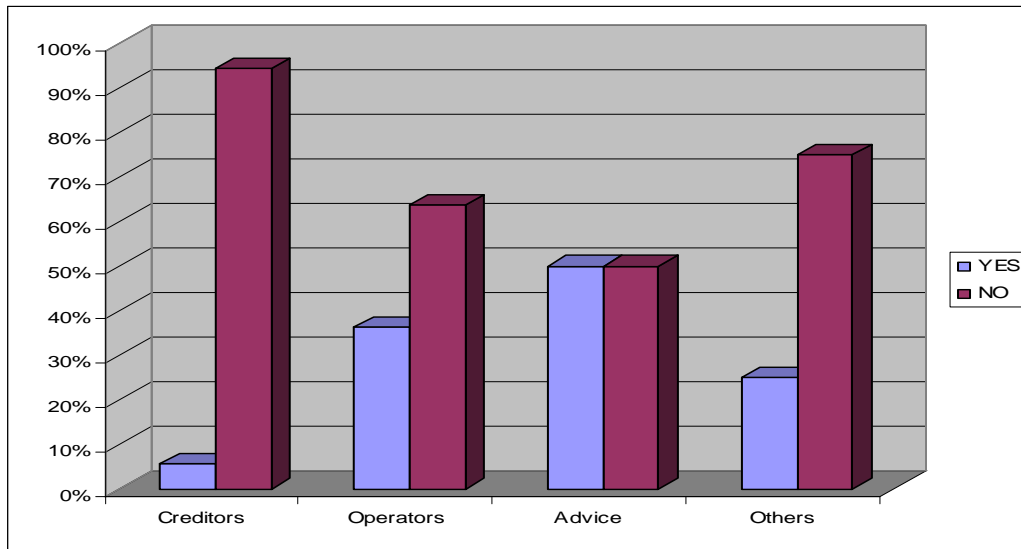
54. Only 24 respondents addressed this specific question. Not all suggested a specific amount, but for those that did, the suggestions ranged from £1.00 per month nominal payments to a flexible individual limit based on the maximum amount of disposable income that a particular debtor had available. However, £50.00 per month was the most favoured option on the basis that this linked to the DRO limit and anything below that level was unlikely to be commercially viable.

The Money Advice Trust said in their response:

*“In our view, plans where the client has a surplus income below £50 a month need to be considered very carefully as to whether they are the best option for the client. A scheme where payments are to be below £50 a month throughout the lifetime of the plan, would call into question their commercial viability.”*

**Q.24: If option 2 or 3 is introduced, should any repayment plan have an element of debt write-off?**

55. We received 39 replies, with 77% being opposed to the introduction of debt write-off. This included 94% of creditors, 64% of DMS operators, 50% of respondents from the advice sector and 75% of other respondents. The general view was there were other existing procedures which allow for this.



In their response Payplan commented:

*“No. We would like to see plans structured so that consumers pay 100% of the debts due at the outset”*

The British Bankers’ Association said:

*“There are already plenty of alternative debt remedies available that allow debt write-off or an element of debt write-off.”*

56. The minority of respondents who supported this proposal generally took the view that some debt write off was essential to avoid plans lasting too long.

In their response Gemstone Financial Management Limited said:

*“After 5 years paying into a plan, there should be a degree of debt write-off.”*

**Q.25: If yes, how could this be balanced against the needs of creditors?**

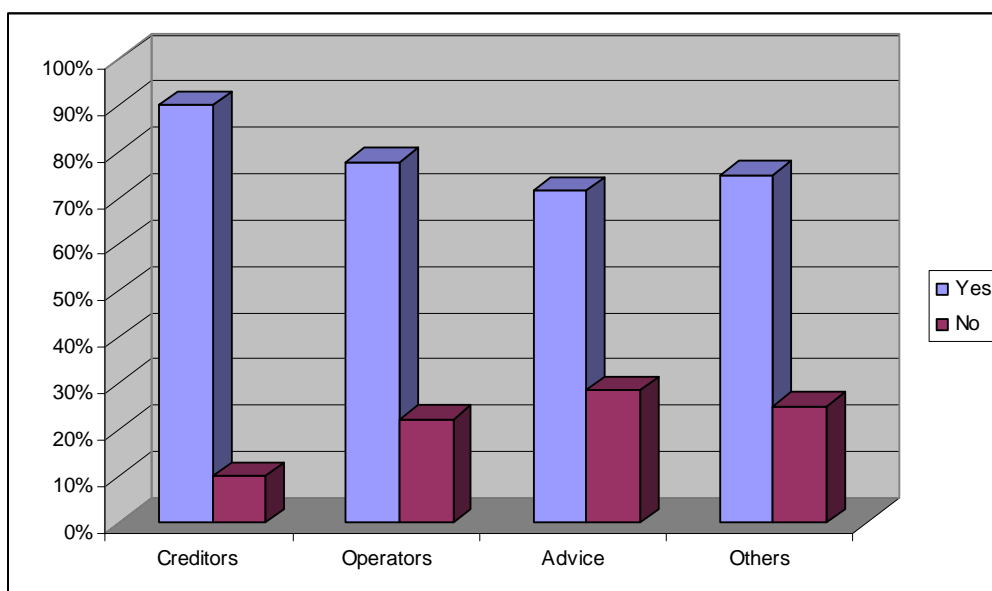
57. We received 29 responses to this specific question. Given that, overall, a large proportion of respondents did not support the inclusion of debt write off, many responses did not make any specific proposals in response to this question. Instead they repeated their original position. The limited number who did provide a specific suggestion made various points including one creditor commented that debt write off might be appropriate where the debtor had mental health problems. Another suggested that it might apply to all debtors but only where they had successfully completed a number of years on a plan.

Lloyds commented:

*“We would want to be able to offer settlement and match-pay offers to eligible customers as part of our strategies and this would enable a degree of write-off but within a carefully managed strategy and not as part of a general condition within a regulated scheme. Debtors with clear incapacity (e.g. proven mental illness) would remain an exception and subject to individual negotiation with creditors.”*

**Q.26: If yes, would requiring creditors to agree to any debt write-off achieve this balance?**

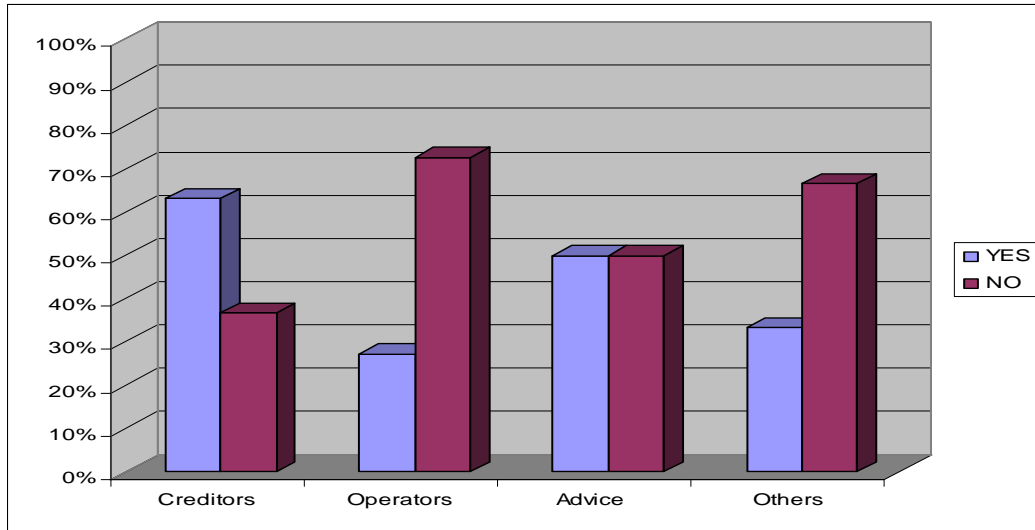
58. A total of 30 responses were received. Of these, 80% supported this idea. These included 90% of creditors, 78% of DMS operators, 71% of respondents from the advice sector and 75% of other respondents. As with Question 24, given that, overall, a large proportion of respondents did not support the inclusion of debt write off, many respondents did not provide any particular additional comments. Of those that did, many repeated their original position but one DMS operator did suggest that any provisions requiring creditor agreement would need to include appropriate rules to stop unreasonable refusals.



**Q.27: If either option 2 or 3 is introduced, should access be restricted to those with multiple debts?**

59. We received 42 replies. There was no clear consensus regarding the response to this question. Overall, 52% of respondents disagreed with the

proposal of limiting access to those with multiple debts. These included 73% of DMS operators, 50% of respondents from the advice sector, 37% of creditors and 67% of other respondents. Overall, their view was that this would unnecessarily restrict access to solutions for people who needed support.



The Debt Resolution Forum said:

*“The only criterion for acceptance into a statutory debt management plan should be that the debtor can demonstrate that they are struggling to repay their debts.”*

Payplan commented:

*“We would hope that people with only one or two creditors should be able to make satisfactory informal arrangements with their creditors, if not then they should be not be denied access to a statutory scheme.”*

60. However, 48% of those who responded agreed with the proposal. These included 63% of creditors, 50% of respondents from the advice sector, 33% of other respondents and 27% of DMS Operators.

For example, the Consumer Credit Counselling Service stated:

*“We would propose a minimum of two debts.”*

**Q.28: If yes, what should be the criteria for the minimum number of debts?**

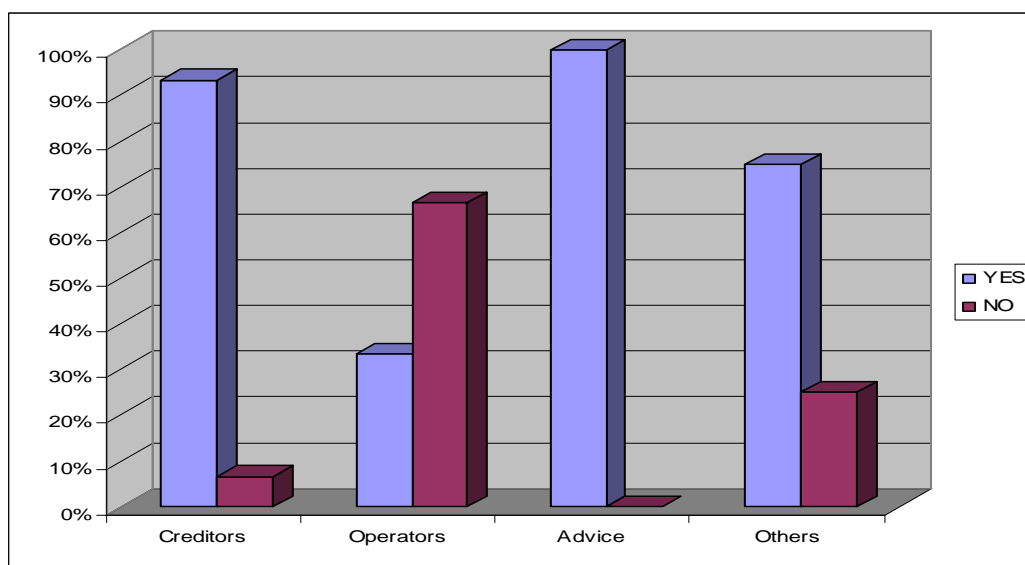
61. A total of 26 respondents addressed this question. Despite the overall lack of consensus on Question 27, around 96% of those who responded to this question agreed that access should be restricted to those with multiple debts, with general support for 2 debts being a workable minimum.

The Money Advice Trust commented:

*“As we accept that a statutory DMP is intended to help those managing multiple debts, we suggest a minimum of two would be a reasonable approach.”*

**Q.29: If option 2 or 3 is introduced, should administration charges be capped?**

62. We received 37 responses. Overall, 73% of interested parties supported capping administration charges. These included all of the advice sector, 93% of creditors, 33% of DMS operators and 75% of other respondents. Generally, the view was that excessive fees and charges did not benefit the consumer and could breach current OFT guidance on debt management.



In their response the Debt Managers Standards Association commented:

*“Ongoing monthly management fees are typically 17.5%. Fee capping could impact on current business models; however excessive fees create clear consumer detriment, which breaches existing OFT DMG.”*

Payplan replied:

*“They should be at a set rate – although providers should be free to charge less if they wish.”*

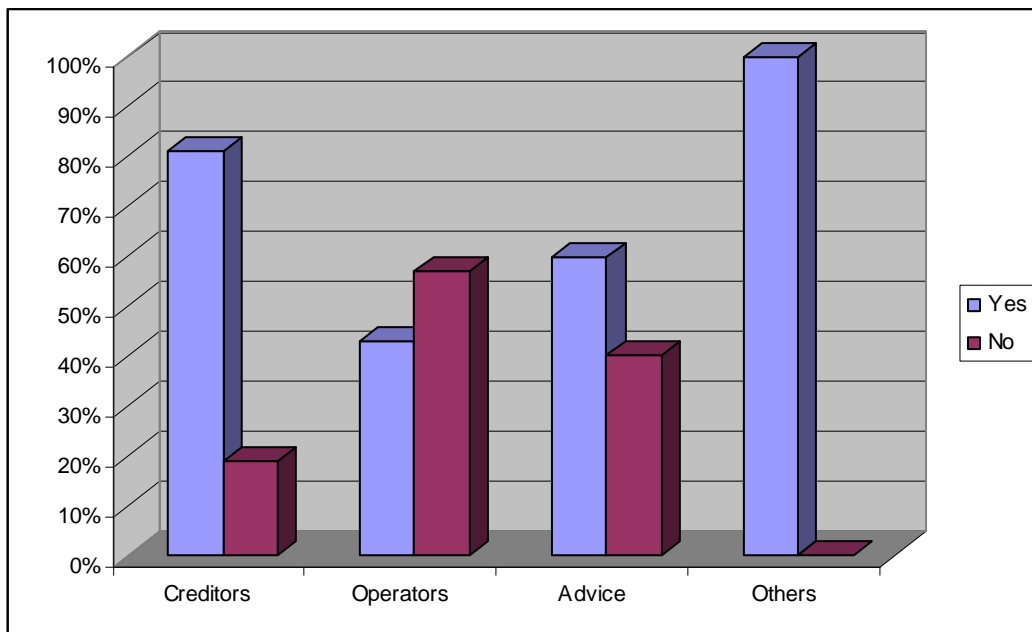
63. Overall 27% of respondents disagreed with the proposal. These included 67% of DMS operators, 25% of other respondents and 7% of creditors. The main reason for not supporting the introduction of a cap was that it should be for the market to continue to set the level of fees and charges.

Gemstone Financial Management Limited stated:

*“No, the market can, does and should decide what is reasonable.”*

**Q.30: If yes, do you agree that the cap on charges should be between 7.5%-15%?**

64. A total of 31 responses were received to this question. Of these, 71% agreed with the proposal, including 81% of creditors, 60% of respondents from the advice sector, all of those from the other respondents group and 43% of DMS operators. The general view was that this would support transparency. Those who disagreed with this range generally did not support the inclusion of any cap, preferring to let the market decide.



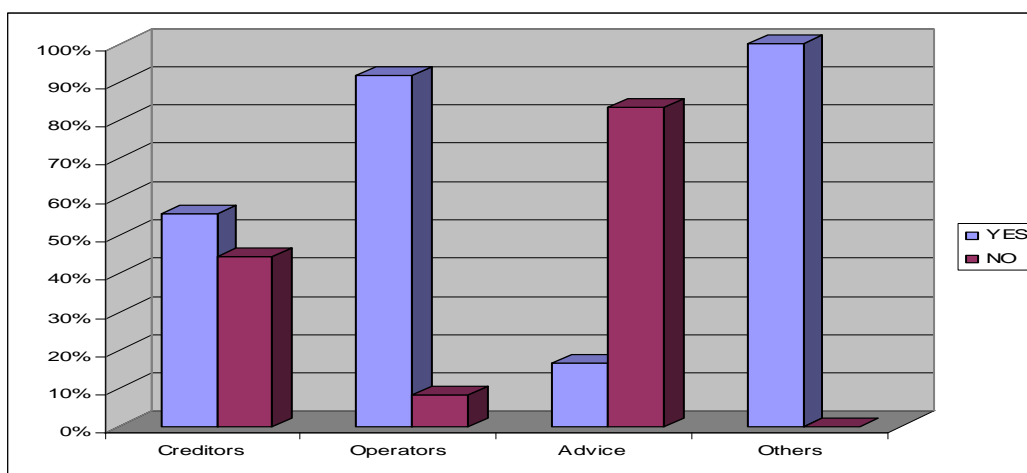
In their response, HSBC commented:

*“Whatever level is agreed there should be a requirement to show the fee and how it is calculated clearly in all relevant documentation, possibly through the use of a summary box. This would allow the debtor to make comparisons between different DMCs in order to make an informed choice.”*

**Q.31: If option 2 or 3 is introduced, should operators be permitted to charge a set-up fee?**

65. We received 41 responses. Overall, 66% agreed that a set-up fee should be permitted. This included 92% of DMS operators, 56% of creditors, 17% of

respondents from the advice sector and all of the other respondents. Generally, they took the view that it was reasonable to allow such a charge provided that it was transparent and fair.



The Finance and Leasing Association said:

*“We would not be opposed to operators charging a set up fee but this should be justified, appropriate and transparent.”*

In their response Payplan commented:

*“Any set up fee should be less than the cost of setting up a case or else there will be commercial incentives to set up plans with a low chance of success. We believe the focus should be on emphasizing long term sustainability.”*

66. However, 34% of respondents, including 83% of those from the advice sector, 44% of creditors and 8% of DMS operators disagreed taking the view that the provision of a set-up fee would not encourage best practice and would be unfair to both debtors and creditors.

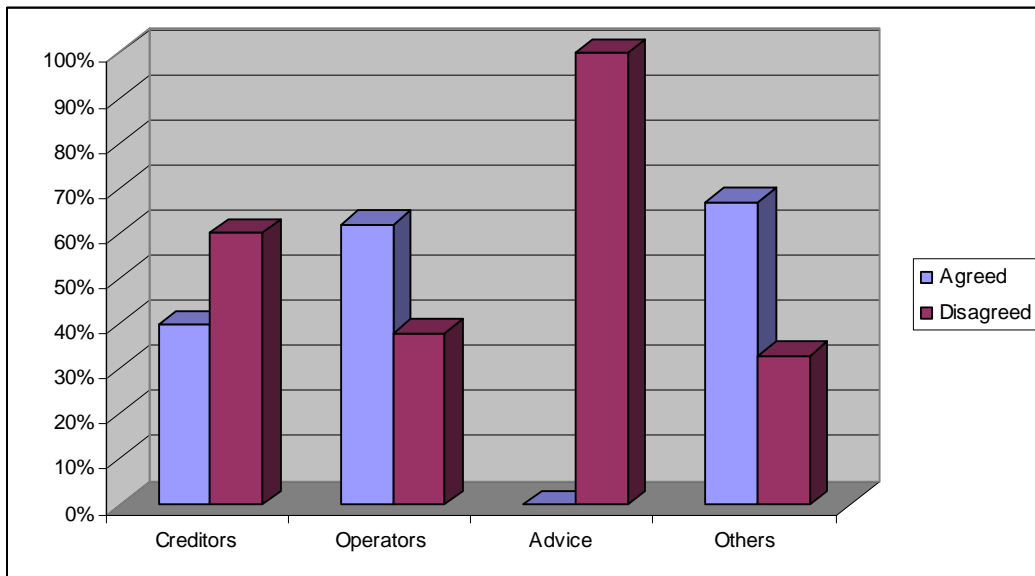
Advice UK said:

*“In our view set-up fees do not encourage best practice and should therefore not be permitted. We think that simplicity as well as transparency in the charging structure are both essential features of a successful debt management scheme.”*

**Q.32: If yes, should a set-up fee be a fixed amount?**

67. Only 25 responses were received that directly addressed this question. Of these, 56% disagreed with the provision of a fixed set-up fee. This included 60% of creditors, 38% of DMS operators, all respondents from the advice

sector and 33% of other respondents. Not all those responding provided comments to accompany their response and invariably where they did, they repeated the points that they had made in their response to Question 31.



**Q.33: If yes, what do you consider to be a reasonable amount?**

68. We received 23 responses. Suggestions for what constitutes a “reasonable” amount ranged from £50.00 per hour to a maximum of two months payments into a scheme. However, there was no consensus on what this should be.

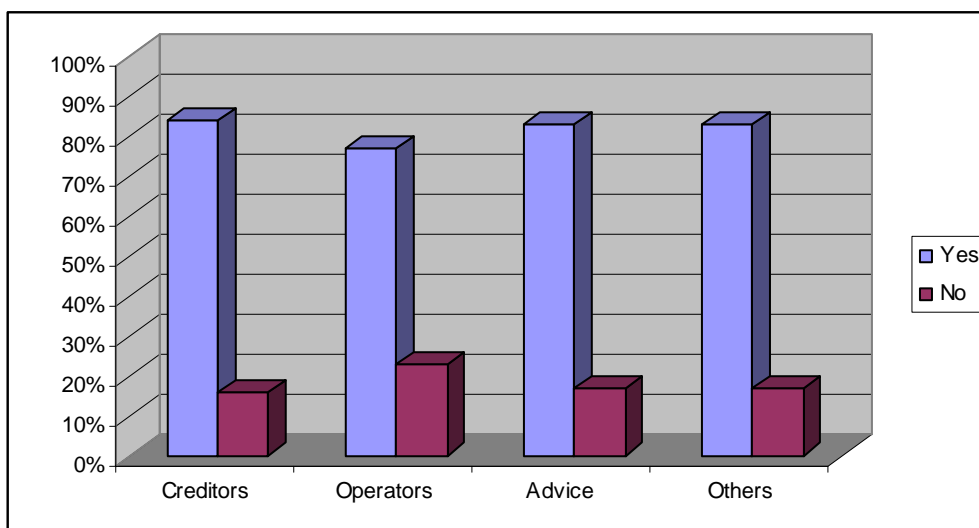
**Q.34: Who should meet the fees and charges of scheme operators?**

69. There were 34 responses to this question. Generally, those from the advice sector took the view that creditors should meet fees and charges. This was supported by a number of major creditors provided that the plan was arranged by a free-to-client provider. In contrast, most DMS operators and the bulk of creditors, considered that debtors to meet these costs. This position was supported by the overwhelming majority of all creditors where the plan was arranged by a fee charging provider.

**Q.35: Should a standard formula/fixed percentage be applied when calculating repayment rates?**

70. There were 40 responses to this question. Of these, 83% agreed with the use of a standard formula. These included 84% of creditors, 77% of DMS operators and 83% of respondents from both the advice sector and other

respondents group. The general view was that consistency between different operators/providers was essential, with substantial support for the use of a product such as the Common Financial Statement (CFS).



In their response TDX said:

*“Yes. Our experience is that across all sector plans, approximately 50% are outside of standard Common Financial Statement guidelines. The reasons for this are:*

- *The CFS was not used in the calculation*
- *The consumer had exceptional and un-noted expenditure in the proposal*
- *The expenditure elements were not used in the correct manner.”*

Paymex replied:

*“We are opposed to the introduction of a fixed percentage of surplus monthly disposable income which would be the basis of the DMP as in our view the CFS will provide the degree of uniformity that is necessary to ensure consistency.”*

**Q.36: If yes, what percentage of surplus income should form the repayment rate?**

71. A total of 37 respondents replied to this question. Not all of these suggested a specific percentage rate. Of those who did, a range of figures were proposed ranging from 10% to 100% with the majority supporting the view that all surplus income should be used to repay the outstanding debt.

The British Bankers’ Association (BBA) commented:

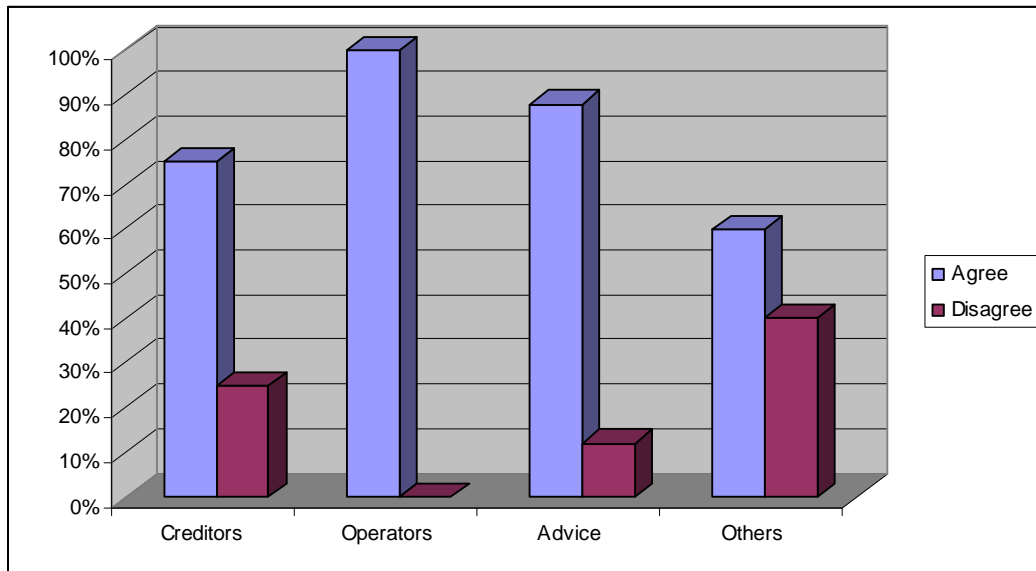
*“We do not believe that a percentage of surplus income should form the repayment rate, as this may encourage only partial repayment (such as 90%) and this will simply lengthen the term of the DMP. Also, some companies sell other products to consumers which enhance their income from the plan, but detract from the disposable income remaining for creditors. Full repayment should always be encouraged, wherever possible.”*

Payplan said:

*“100%. Surplus income should be calculated in accordance with CFS guidelines and should be distributed in full to creditors on a strictly pro-rata basis rather than keeping back a portion of the surplus for contingencies.”*

**Q.37: Should the above debts be excluded?**

72. There were 38 responses that addressed this question and 82% agreed with the proposed list of excluded debts. These included 75% of creditors, all DMS operators, 88% of respondents from the advice sector and 60% of other respondents, with a number expressing the view that it was essential that there was consistency with other regimes such as the DRO and bankruptcy.



The Student Loans Company stated:

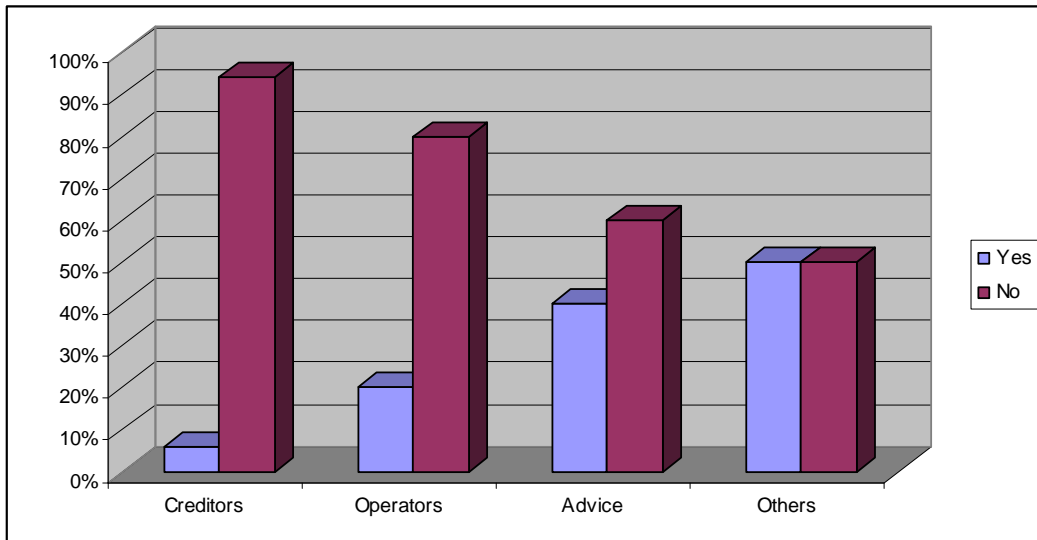
*“Yes. This provides a common approach to the treatment of the over-indebted (consistent with IVAs, Bankruptcy, etc.).”*

The Insolvency Practitioners Association said:

*“Yes. There should be coherence in admissible debts between different debt repayment/relief solution.”*

**Q.38: Are there any other debts that should be excluded?**

73. A total of 35 responses were received to this question. Of these, 80% took the view that no other debts should be excluded. This included 94% of creditors, 80% of DMS operators, 60% of respondents from the advice sector and 50% of other respondents who generally considered that the suggested list would ensure consistency with existing regimes. However, a number of creditors and DMS operators also supported the addition of priority debts to the list of debts that should be excluded from any such schemes on the basis that provision was already made for these within assessment tools such as the CFS.



In their response, Southern Water Services Limited replied:

“No.”

However, Fairpoint commented:

“Council tax arrears, utility arrears and court fines.”

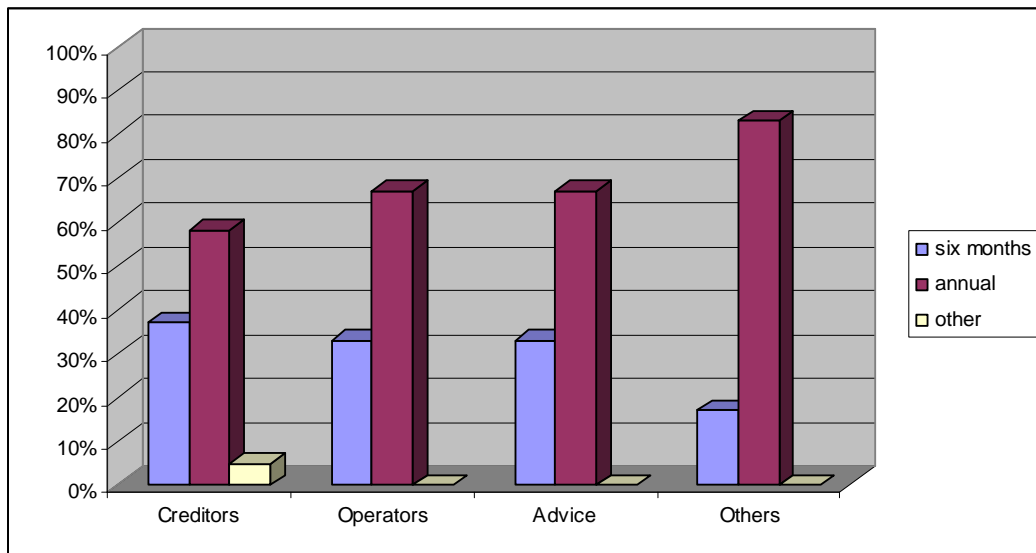
**Q.39: If either option 2 or 3 were introduced, how regularly do you feel that debtors should be required to update information on their means? Should this apply under a code of practice?**

**(a) Six-monthly**

**(b) Annually**

**(c) Other**

74. We received 46 replies. Overall, 65% of respondents supported the introduction of annual updates of information, with 28% supporting six-monthly updates and 12% being non-specific. Those supporting annual updates included 67% of DMS operators and respondents from the advice sector, 58% of creditors and 83% of other respondents.



75. Their general view was that this would allow for a more realistic update regarding the debtor’s circumstances, ensuring that a repayment plan was still the most appropriate solution for the debtor over a sustained period.

The British Banking Association said:

*“We would expect an annual review of the customers’ circumstances to be conducted, as a minimum.”*

Advice UK replied:

*“We consider that annual reviews will be sufficient to obtain an update on the client’s circumstances and to ensure that a regulated plan is still the most appropriate option for the client.”*

76. The 28% of respondents who supported six-monthly updates included 37% of creditors and 33% of DMS operators and respondents from the advice sector.

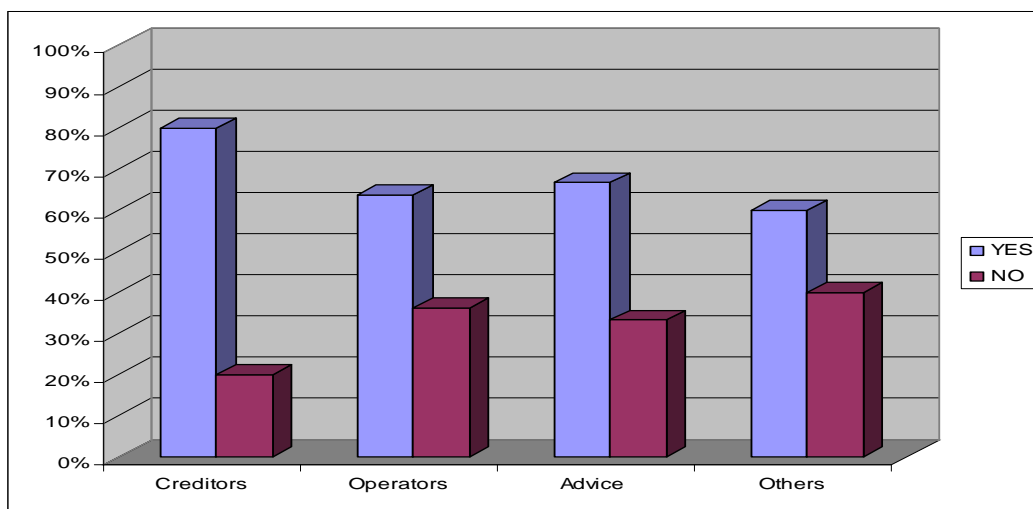
However, none of these advanced particular reasons for their view, other than to require it for a shorter period would unnecessarily add to costs.

Debt Wizard said:

*“Six-monthly. If it is deemed to be less than this then the operator will incur additional costs that will need to be covered from contributions into the plan, this will mean less return to creditors.”*

**Q.40: Do you think that, if option 2 or 3 is introduced, plans should be terminated if circumstances improve sufficiently to allow normal commitments to be met?**

77. We received 42 responses. Overall, 71% supported this proposal. These included 80% of creditors, 67% of respondents from the advice sector, 64% of DMS operators and 60% of other respondents. Generally, they took the view that if the debtor's financial circumstances had sufficiently improved to allow them to meet their contractual commitments then they no longer needed the support of a debt management plan.



The Finance and Leasing Association replied:

*“The customer's circumstances would need to improve so that they could meet the normal commitments for all their creditors,”*

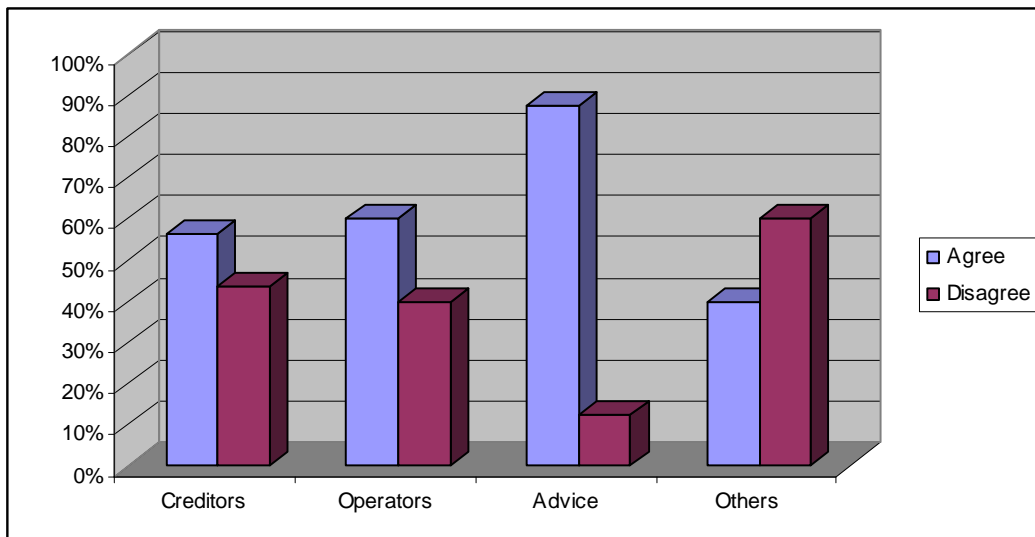
In their response R3 commented:

*“If the individual is able to pay back the money they owe in a shorter period of time than originally envisaged due to a beneficial change in circumstance (the proverbial lottery win), we believe the plan should be terminated as soon as possible.”*

78. 29% of all respondents, including 33% of those from the advice sector, disagreed.

**Q.41: Is 12 months an effective barrier against potential misuse?**

79. We received 39 responses. Of these, 62% agreed that 12 months was an appropriate time limit before another application could be made. These included 56% of creditors, 60% of DMS operators, 88% of respondents from the advice sector and 40% of other respondents. There was no consensus amongst those who did not agree with the 12 month restriction on re-entry. Generally, views ranged from no restriction at all, in order to provide flexibility, to the provision of a 6 year barrier to re-entry in order to ensure consistency with existing provisions such as the DRO and bankruptcy.



AIC commented:

*“Only if it is built into a declaration that the debtor agrees if their circumstances change so that they are able to increase their payments before the review they contact the operator.”*

The Insolvency Practitioners Association said:

*“Any limitation should be consistent with limitations imposed in relation to accessing other debt repayment/relief procedures.”*

**Q.42: Do you have any comments on the powers, sanctions or funding mechanism for the Supervisory Authority?**

80. A total of 33 respondents provided comments in response to this question. There was general support across all groups for the Supervisory Authority to be funded by a levy on the DMP providers and for it to have strong and effective enforcement powers.

In their response, Payplan commented:

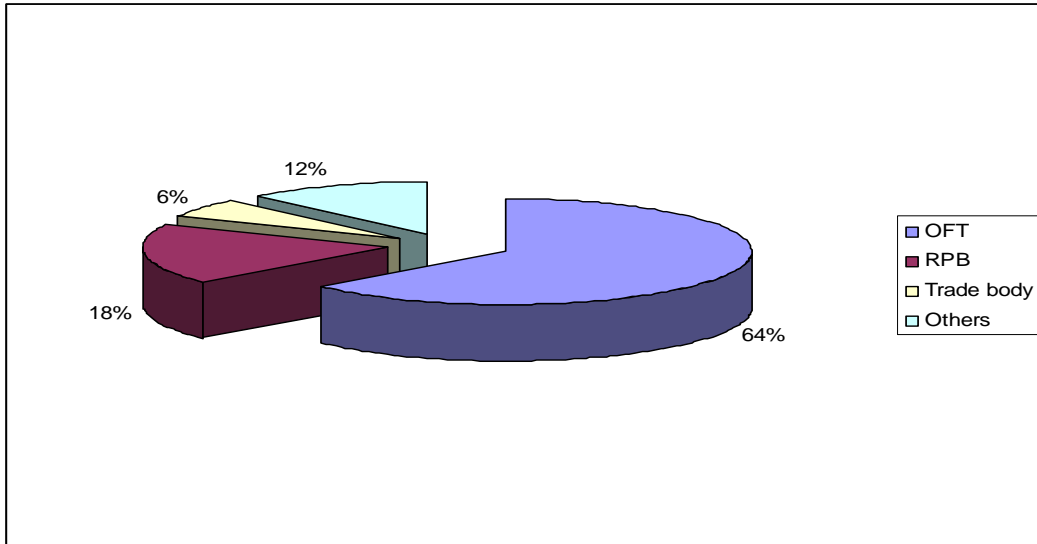
*“We think the audits should be funded by providers with costs proportionate to the size of the organisation. The supervising authority should be empowered to impose conditions on providers to deal with poor performance/behaviour and ultimately should be able to withdraw authorisation to offer the scheme.”*

Lloyds Banking Group replied:

*“We do not believe that Option 3 is the way forward but if it were to be adopted then feel that the payment for supervising/auditing the advice industry should come from within it. Sanctions should be wide ranging and include withdrawal of necessary licenses.”*

**Q.43: Who should be considered to be authorised by the Lord Chancellor for the role of Supervising Authority?**

81. There were 33 replies received to this question. A variety of bodies were put forward for the role of the Supervisory Authority, with 6% of respondents supporting self-regulation through the Trade Associations and 18% the authorisation of one of the Recognised Professional Bodies responsible for regulating Insolvency Practitioners. However, 64% of those expressing a view proposed the OFT as being the most appropriate body given its existing involvement in this area.



The British Bankers' Association commented:

*"We believe that a form of Supervising Authority is still required for an option 2 model, based on a DMP Protocol arrangement. We consider that the OFT would be an appropriate body to be appointed as the Supervising Authority, given its current remit covers Consumer Credit License holders and its Debt Management Guidance and the related enforcement powers it already possesses."*

The Consumer Credit Counselling Service replied:

*"Office of Fair Trading."*

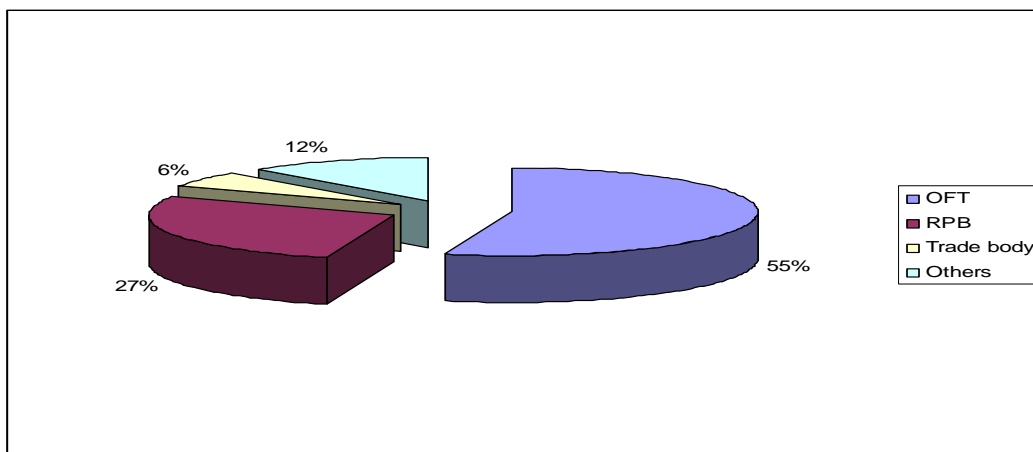
In their response the Insolvency Practitioners Association said:

*"The IPA, which has extensive experience of licensing, monitoring and regulating IPs, has been working with DRF in putting in place monitoring and disciplinary procedures, including a detailed inspection plan, for DRF members. Those procedures should be capable of being extended to other providers/operators under a Code or the legislation."*

**Q.44: Is there an existing regulatory regime that might be adapted to take on the Supervising Authority role?**

82. We received 33 replies to this question. In view of the responses to Question 43, it is not surprising that there was a similar range of suggestions. In this case, while the proportions supporting the use of Trade Associations or other bodies, such as the Insolvency Service or the FSA, were the same, 27% of respondents suggested the authorisation of one of the Recognised Professional Bodies responsible for regulating Insolvency Practitioners.

However, 55% of those expressing a view proposed the OFT as being the most appropriate body given its existing involvement in this area



The Debt Resolution Forum commented:

*“DRF would welcome the opportunity to work with IPA, who would act as Supervising Authority for Statutory Debt Management Plans and who would accredit and monitor DRF member firms to at least a similar standard across all other debt resolution activities and procedures.”*

However, the British Bankers Association said:

*“We believe that the OFT should be appointed as the Supervising Authority, for an option 2 solution for a DMP Protocol, and that the OFT should monitor, regulate and enforce DMC practices”, and,*

Payplan commented:

*“We think the OFT would be best placed to take on this role. It would be a good fit with their existing powers under the Consumer Credit Act.”*

#### **Q.45: How should the Supervisory Authority carry out its functions?**

83. Only 26 respondents addressed this question. There was strong support from all sectors for the Supervisory Authority to take a proactive risk based approach with strict monitoring with regular audits of approved providers, supplemented by mystery shopping and ad hoc visits.

Northern Rock commented:

*“We recommend a risk based approach commencing with an assessment of each company to determine a baseline and then assign them risk ratings, which dictate the frequency of audits/visits they should receive in the future. This would be updated at least annually based on an internal annual*

*compliance review, results of thematic reviews, customer complaints, mystery shopping and knowledge from other regulators.”*

Bournes replied:

*“There would need to be regular audits. Once satisfied that the approved operators would be able to give the most appropriate advice, we would conduct an audit after the third month. Provided there were no concerns at this stage, the next audit would take place in a further 12 months. Where problems were to be identified, the approved operators would be offered further training and support. Close supervision would follow until we were satisfied that the operators were following best practice and that they would be able to meet the conditions of the terms of approval to practice as an approved operator.”*

## Conclusion and next steps

84. This Government recognises that debt management plans are only one of a number of possible remedies that are available to those who are currently struggling to deal with their debt and is conscious of calls by a number of key interested parties for a review to ensure that the regime is currently working in the way intended. It is difficult to look at debt management in isolation as there are areas of overlap with other remedies, and Department for Business Innovation and Skills (BIS) Minister, Edward Davey, on 13 July announced his intention to launch a review of consumer credit and debt to identify what the current issues are facing consumers and creditors with a view to improving the existing regime. This review will also look at personal insolvency and the role of the courts in managing debt. BIS will issue a call for evidence after the Summer Recess **with a view to working up proposals for consultation.**
85. Work should take place however to address the concerns which stakeholders have identified and the Government will commit itself to working with stakeholders to identify ways in which those concerns can best be dealt with. It is noted that as a first step, the Office of Fair Trading (OFT) will be reviewing their existing debt management guidance following the publication on [xxxx] of their report looking at compliance with current guidelines. That report was highly critical of compliance rates across those areas of debt management provision that it focussed on, making clear that further action is required.
86. Many responses have called for some simplification of the regulatory regime for those involved in the debt arena. In this context, the Ministry of Justice have confirmed that they will not be taking forward powers to introduce enforcement restriction orders or to amend administration orders at this time and that they will look to leave the issue of debt management to be taken forward by the Insolvency Service. All of these areas will be included in the planned review.

## **Impact Assessment**

87. There were very few responses to the questions in the Impact Assessment. These responses did not contain sufficient information to enable us to produce an updated impact assessment.
88. It is intended that the proposals that result from the review by BIS of consumer credit, debt, personal insolvency and the role of the courts in managing debt will be put forward for consultation at the end of this year or early next year. The Government will publish an impact assessment as part of this consultation.

## Consultation Co-ordinator contact details

If you have any comments about the way this consultation was conducted you should contact the Ministry of Justice Consultation Co-ordinator at [consultation@justice.gsi.gov.uk](mailto:consultation@justice.gsi.gov.uk).

Alternatively, you may wish to write to the address below:

**Consultation Co-ordinator**  
**Legal Policy Team, Legal Directorate**  
**6.37, 6<sup>th</sup> Floor**  
**102 Petty France**  
**London SW1H 9AJ**

## **The consultation criteria**

The seven consultation criteria are as follows:

1. **When to consult** – Formal consultations should take place at a stage where there is scope to influence the policy outcome.
2. **Duration of consultation exercises** – Consultations should normally last for at least 12 weeks with consideration given to longer timescales where feasible and sensible.
3. **Clarity of scope and impact** – Consultation documents should be clear about the consultation process, what is being proposed, the scope to influence and the expected costs and benefits of the proposals.
4. **Accessibility of consultation exercises** – Consultation exercises should be designed to be accessible to, and clearly targeted at, those people the exercise is intended to reach.
5. **The burden of consultation** – Keeping the burden of consultation to a minimum is essential if consultations are to be effective and if consultees' buy-in to the process is to be obtained.
6. **Responsiveness of consultation exercises** – Consultation responses should be analysed carefully and clear feedback should be provided to participants following the consultation.
7. **Capacity to consult** – Officials running consultations should seek guidance in how to run an effective consultation exercise and share what they have learned from the experience.

## Annex A – List of respondents

BBA

Lloyds Bank

Finance and Leasing Association

Santander Cards

Max Recovery

Insolvency Practices Council (IPC)

Paymex

R3

Insolvency Practitioners Association

RBS

Credit Services Association

Nationwide

ThinkMoney

MBNA

Bournes

Christians Against Poverty

Northern Rock

National Money Helpline

Student Loans

DEMSA

CCUA

Harrington Brooks

Pentagon (EuroDebt)

Money Plus Group

Citi

Capital One

CBI

ABS

CCCS

Advice UK

MAT

Fairpoint

DRF

Association of HM District Judges

Lewis Group

Credit Action

Citizens Advice

Payplan

Money Advisor

Paul Brindley (IP)

British Parking Association

Debt Wizard

Gemstone Financial Management

Price Waterhouse Coopers

ICAEW

ABCUL

Debt Advisory Line

AIC

Southern Water Utilities

OFT



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