

CR Code Variation – Industry Association Consultation

20 February 2019

Attendees:

- Jane Edwards, EWOV
- Jill Brewer, TIO
- Elsa Markula, ARCA

General statement

- Both EWOV and TIO noted that many of the proposed variations do not impact on their members at all, with neither the telecommunications or energy sector participating in comprehensive credit reporting. The credit reporting issue of most relevance to EWOV and TIO is default listings, and it was noted that the variations do not directly impact default listings.
- ARCA provided an overview of each of the proposed variations for EWOV and TIO. The paragraphs noted below are those proposed variations for which additional feedback was offered by EWOV and/or TIO.

Paragraph 24.3 – CR Code review

- ARCA explained proposed variation, and consumer advocate feedback proposing a fixed date period (based on commencement of each consultation). EWOV noted the fixed date for review seems reasonable. TIO are agnostic on this variation.

Paragraph 11 – publicly available information

- EWOV commented that this variation appears reasonable, and that it makes sense to close the loophole. EWOV would also be concerned about the prospect of individuals without access to legal advice having difficulty having this information removed from their credit report.
- TIO noted that they had seen the negative impacts of the inclusion of this type of information on credit reports when the TIO representative was at the then Financial Ombudsman Service.

Paragraph 21 - complaints

- TIO observed that they had seen similar issues with accessibility arise with the use of ISO standards.

Paragraph 20.4 (corrections timeframe)

- TIO noted that the Telecommunications Consumer Protections Code imposes a 1 business day rule for corrections to be made, so the time period proposed here won't cause any issues.
- EWOV stated that if it had a dispute where an issue was raised with a refusal to process a simple correction in less than the current 30-day timeframe, it would look at what is fair and reasonable. It would take the view that a CP should do something faster than the mandated 30-day timeframe if it is fair and reasonable to do so. In consideration of this, a time period of 5 business days (as suggested by ARCA – based on feedback from industry and consumer advocates) is reasonable.

Paragraph 10.1 (payment information)

- Neither TIO or EWOV had feedback about the proposed variation itself, but instead discussed with ARCA broader issues around the removal of the 'S' code and possible disputes arising from the change from 'S' to 'P' code.