

Credit Services Association (CSA) **Code of Practice**

April 2014



About the Association

The Credit Services Association (CSA) is the only national association in the United Kingdom for companies active in the provision of services relating to the recovery of debts, and has a history dating back to 1902.

The main objectives of the CSA is to improve practices and efficiencies in the industry; add integrity, structure and dignity to each of our Members' business activities whilst protecting customers; and to present a united approach to those bodies that regulate our Members' activities.

As the industry continues to develop, the CSA will proactively help Members achieve best practice, and will continue to engage with regulators and lobby on behalf of Members.

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Contents

Introduction	5
Legal and Regulatory	6
Common Principles	7
1. Key requirements	8
2. Dealing with customer difficulties	10
3. Dealing with complaints and disputes	11
4. Data protection and confidentiality	12
5. Monitoring compliance	13
Sector specific principles	14
6. Tracing	15
7. Communication in collections	16
Telephone	
Written communication	
8. Doorstep collection and recovery	17
9. Debt sale and purchase	18
10. Legal recovery/litigation	20
11. Overseas collection and recovery	21
12. Commercial collections	22
Helpful information	23

Using this Code of Practice

This Code of Practice is divided into sections relating to certain activities. Some sections apply to all Members of the Association and some sections apply only to those Members in specific sectors. Each section is colour-coded, relative to the activities the section relates to. Members must comply with the sections applicable to them as illustrated by the colour-coded box applied to the business activity.









Key

	Telephone and written communication collection and recovery	Doorstep collection and recovery (debt collection visits)	Debt sale and purchase	Pre-litigation and litigation	Overseas collection and recovery	Commercial collection and recovery
Tracing						

Key code: common principles

					
Key requirements					
					
Dealing with debtor difficulties					
					
Dealing with complaints and disputes					
					
Data protection and confidentiality					
					
Monitoring compliance					

Key code: sector specific principles

						
Tracing						
						
Telephone and written communication						
						
Doorstep collection and recovery						
						
Debt sale purchase						
						
Pre-litigation and litigation						
						
Data protection and Overseas collection						
						
Commercial collection						

Introduction:

Code of Practice

The Credit Services Association (CSA) is a trade association representing the debt collection and debt purchase industry and related sectors. The CSA acts as the voice of the collections industry and Membership of the CSA is a kite mark of high standards. Businesses join the CSA to show their commitment to these high standards.

This Code of Practice sets out best practice standards we expect from our Members, and which customers and businesses engaging with our Members should expect. Members agree to comply with this Code of Practice by virtue of Membership. We will ensure that Members found to be acting contrary to this Code of Practice will be dealt with in accordance with our disciplinary procedures.

We believe that this Code of Practice will enable customers and businesses to address their debts in confidence of fair treatment. To fulfil this potential those with debts outstanding must cooperate with the businesses managing their debts to agree reasonable solutions. We do not support any level of debt avoidance or delaying tactics from customers, or any nuisance caused to our Members through abuse or intentional misinterpretation of this Code of Practice or any regulatory device.

This Code of Practice is intended to be a helpful resource for customers, whilst compliance with it is obligatory for CSA members to ensure best practice standards are maintained.

Peter Wallwork
CSA chief executive officer

Legal and regulatory

The CSA expects their Members to maintain all required regulatory licences, registrations and authorisations and to adhere to all relevant legal and regulatory requirements, guidance and best practice, including this Code of Practice.

This Code of Practice does not cover:

- any type of lending, savings or investments activity for customers or businesses
- specific activity in relation to insurance or mortgage products
- the activities of brokers or other intermediaries
- claims for compensation

We have also provided helpful information for customers and businesses about our industry, which can be found under the Helpful Information section of this Code of Practice.



Common principles

This section applies to all Members

1. Key requirements
2. Dealing with customer difficulties
3. Dealing with complaints and disputes
4. Data protection and confidentiality
5. Monitoring compliance




Common principles

1. Key requirements

Every Member shall:

- a. conduct its business in compliance with all relevant legislation, regulations, regulatory guidance and requirements and this Code of Practice
- b. conduct its business under names, titles and trading styles which are not intended to confuse, mislead or otherwise embarrass clients, creditors, customers or members of the public and which will not imply any association with other organisations, governmental bodies or persons which either do not exist or carry no association with the business
- c. cooperate with the CSA, regulators and organisations that regulate or supervise the debt and/or recoveries industry
- d. make available on their website (if they have one), or following a request, a copy of this CSA Code of Practice
- e. provide adequate and sufficient training to its employees in order to ensure that they conduct themselves in accordance with this Code of Practice
- f. regularly examine and audit their practices, strategies, communications and compliance culture against this Code of Practice
- g. ensure that any communication complies with this Code of Practice and is in plain English
- h. have and maintain clear and effective policies and procedures covering all business activities they are engaged in
- i. not unlawfully discriminate against any person
- j. have in place a separate business account for all monies collected on behalf of clients and instruct their bank that the account only holds client money
- k. inform their clients of the true rates of charges for services rendered
- l. distribute client money only as agreed by the client
- m. report sums collected and remit to their clients at least once a month, or as otherwise agreed, all monies collected
- n. ensure they undertake due diligence and audit any third party agent on a regular basis to ensure adherence to regulatory requirements and this Code of Practice regardless of whether they are a CSA Member
- o. comply with all reasonable requests for information made by customers or their representatives, regulators, clients and creditors, whether statutory or not, and upon payment of the statutory fee if applicable
- p. not place restrictions or time limits on the legitimate querying of unallocated payments
- q. treat businesses with whom they deal fairly and transparently
- r. provide prior written notice to customers when outsourcing accounts, to ensure the customer's awareness of who will be contacting them

- 
- s. make contact at reasonable times and at reasonable intervals, taking into consideration the reasonable wishes of the customer, which may include the preferred method of communication. Where possible, make customers aware of business opening times and highlight contact periods
 - t. where automated dialling systems are used, ensure compliance to the Ofcom Statement of Policy*
 - u. take appropriate steps to ensure the accuracy of data processed by it and in particular data relating to individuals and their debts
 - v. when an account is reasonably disputed or a complaint is received, suspend collection activity and investigate and where applicable refer the matter to their client
 - w. ensure that it does not put any customer under undue pressure to borrow money
 - x. take reasonable steps to ensure that the person being contacted is in fact the customer
 - y. communicate with customers fairly and transparently, and not intentionally mislead them
 - z. cooperate with customers and their authorised third parties in line with regulatory guidance, and not act in a manner intended to publicly embarrass or cause them distress
 - aa. treat customers fairly and not subject customers (or their authorised representatives) to aggressive practices, or conduct which is deceitful, oppressive, unfair or improper, whether lawful or not
 - bb. exercise forbearance and consideration of customer's circumstances, of which they are aware, in particular in relation to those who are particularly vulnerable or experiencing severe financial hardship
 - cc. take into account the customer's circumstances and ability to pay when seeking to recover debts
 - dd. ensure that they take into account the customer's domicile and the law applicable to the agreement underlying the debt

**Ofcom Statement of Policy on the persistent misuse of an electronic communications network or service*



Common principles

2. Dealing with customer difficulties

Financial difficulties

Every Member shall:

- a. unless instructed otherwise, accept all reasonable offers by customers to pay by instalments provided such customers have supplied (i) evidence of inability to pay in full, and (ii) accurate income and expenditure information demonstrating the maximum amount they can afford to pay
- b. be empathetic with customers experiencing financial difficulties
- c. encourage the customer to engage with the Member or offer appropriate signposting to money advice organisations who can assist
- d. allow the customer to apportion income to the payment of priority debts such as mortgage or rent when assessing the customer's ability to repay
- e. suspend any debt collection and recovery activity where the customer demonstrates they are seeking financial assistance and provide the customer breathing space of at least 30 days
- f. be prepared to accept a token offer made by the customer or their representative when evidence has been provided that they cannot afford to pay more
- g. consider reducing or stopping interest, charges or fees being applied to the account if the customer has demonstrated financial difficulties
- h. ensure information in relation to the customer's financial circumstances is passed on to any third party agency subsequently instructed to collect the debt.

Mental health

Every Member shall:

- i. obtain and use sensitive information only with the explicit consent of the customer. Processing such information must be in accordance with the Data Protection Act 1998 and any guidance published by the Information Commissioner's Office
- j. when requesting evidence of mental health problems, seek appropriate information including, where necessary, requests for the completion of the Debt and Mental Health Evidence Form, or similar, from an appropriate/authorised person
- k. in instances where the customer is experiencing mental health problems, only initiate court action to pursue the debt if it is reasonable and proportionate to do so
- l. ensure information in relation to the customer's mental health problems is passed on to the instructing client or any third party agent subsequently instructed



Common principles

3. Dealing with complaints and disputes

The CSA considers that a 'complaint' means any expression of dissatisfaction about the way in which the Member has conducted itself and a 'dispute' means any denial of certain facts in relation to the debt itself. A request for information, such as a copy credit agreement or statement of account, does not in itself amount to a complaint or dispute.

Every Member shall ensure it maintains an effective dispute and complaint handling procedure, and that it does not operate any unreasonable barriers for customers to submit a dispute or complaint. Where accounts are within the jurisdiction of the Financial Ombudsman Service, Members must adhere to the relevant DISP rules published in the FCA Handbook.

Complaints

Every Member shall:

- a. cease recovery activity whilst investigating a complaint
- b. acknowledge receipt of a complaint, and advise of the timescales for investigation
- c. following a request, provide customers with a copy of its complaint handling procedures
- d. handle and deal with complaints, whether verbal or written, promptly and in a clear manner
- e. advise complainants of their right to refer their complaint to the CSA, as and where appropriate
- f. take appropriate remedial action in instances of failing or error
- g. undertake root cause analysis of complaints and take corresponding action to improve business practices
- h. keep a record of all complaints, howsoever received, and ensure the appropriate management are aware of the level, nature and route cause of complaints

Disputes

Every Member shall:

- i. engage with clients and customers to ensure disputes are investigated and dealt with promptly
- j. cease recovery activity whilst investigating a valid dispute
- k. provide a response detailing the member's conclusion to the dispute
- l. provide sufficient information to justify the stated conclusion



Common principles

4. Data protection and confidentiality

Every Member shall:

- a. process personal and sensitive data in accordance with the relevant data protection legislation, ensuring compliance to the Data Protection Principles
- b. only obtain and process data from legitimate sources or databases
- c. take prompt steps to correct data, both internally and with the credit reference agencies, where it is aware that the data is out of date or inaccurate
- d. pass on or make promptly available information in relation to the customer's financial circumstances, any dispute or complaint, or mental health problem in order to prevent collection activity from continuing where it is inappropriate to do so
- e. use appropriate controls to ensure that any exchange of data to any third party is lawful and adequately protected
- f. ensure they have the technical and organisational measures in place to prevent unauthorised and unlawful processing and disclosure of information
- g. comply with any subject access request received from an individual or any third party representative acting on behalf of the individual
- h. ensure appropriate data protection checks are carried out when speaking with customers to verify their identity and where necessary and appropriate, validate and update information received from the customer
- i. observe and protect each client's data, strategies, integrity and business methods
- j. operate a written data retention policy



Common principles

5. Monitoring compliance

Every Member shall:

- a. keep abreast of relevant legislation, regulations, regulatory guidance and requirements and updates to, and guidance relating to, this Code of Practice
- b. periodically test the compliance knowledge of its staff as appropriate to their job functions
- c. employ appropriate and sufficient organisational processes to enable the routine monitoring of its compliance performance, including that of its staff and agents
- d. keep records of compliance monitoring and testing undertaken in sufficient detail to illustrate compliance performance

Breaches of this Code of Practice:

Allegations of breaches of this Code of Practice will be investigated by the Association. If any investigation identifies serious breaches of this Code of Practice by any member the matter will be referred by the Chief Executive to the Board. Each Member shall cooperate with the Association in a timely manner, providing requested information. The Association shall determine any sanction for a breach of this Code of Practice in accordance with its Articles of Association. The Association may publicise any sanctions it imposes on a member.



Sector specific principles

This section applies to all Members who undertake each activity

6. Tracing
7. Communication in collections
8. Doorstep collection (debt collection visits)
9. Debt sale and purchase
10. Pre-litigation and litigation
11. Overseas collection and recovery
12. Commercial collection



Sector specific principles

6. Tracing

Every Member shall:

- a. when seeking to identify an individual, take reasonable steps to ensure that data and information used in the identification process is, to the best of their knowledge, accurate and adequate
- b. ensure that all practices involved in the tracing process are transparent and in line with relevant regulation and guidance prior to any collections activity
- c. take reasonable steps to ensure that the person traced is in fact the customer
- d. attempt to verify data obtained relating to a customer's whereabouts using one or more information sources, which could include reliable databases, a soft trace letter, contacting other people or doorstep enquiries
- e. not use neighbours to pass on messages as part of the trace process
- f. demonstrate that processes are in place to deal effectively and fairly with any instances of mis-trace (when data obtained proves to be inaccurate) and keep records of such instances
- g. where data is proven to be inaccurate, update all records promptly and accurately



Sector specific principles

7. Telephone and written communication collection and recovery

Telephone communication

Every Member shall:

- a. when making contact by telephone, ensure adherence to data protection requirements and verify the identity of the customer or their authorised third party before discussing the nature of the call
- b. when leaving a message, not disclose the nature of the call or any details relating to the debt, or other personal information
- c. not refer to litigation or insolvency proceedings unless the commencement of proceedings is genuine and intended
- d. ensure that staff members who use pseudonyms can be easily identified within the organisation

Written communication

Every Member shall:

- e. when making written contact, adhere to the CSA Guidance on Debt Collection Communication*, and ensure communications are written and produced in line with applicable regulations, legislation and regulatory guidance
- f. ensure that on transfer of a debt to a third party agent the customer receives written notification advising them of who is now responsible for collecting the debt, so that they are aware at all times who will be making contact
- g. provide customers with information on repayment methods
- h. when using email to contact customers, before sending debt related correspondence take reasonable steps to verify that the email address obtained is valid and is an acceptable form of communication
- i. consider any statutory requirements which require a particular method for sending certain documents or notices
- j. when sending text messages, take reasonable steps to verify that the mobile telephone number obtained is valid
- k. ensure text messages do not disclose the nature of the contact, or refer to the debt or other personal details unless permitted to do so by the customer

** Use, format and content of Standard Debt Collection Communication, produced in association with the Office of Fair Trading*



Sector specific principles

8. Doorstep collection and recovery (debt collection visits)

Doorstep collection is an effective method of debt recovery, and should not be used as a threat of action. It is not bailiff activity, and should not be referred to as such.

Every Member shall:

- a. provide adequate training to field collectors to ensure that all visits are performed in accordance with relevant legislation, regulations, regulatory guidance and codes of practice
- b. provide field collectors with appropriate identification which should be offered to customers at the first opportunity and made available immediately upon request
- c. give, where appropriate, adequate notice to the customer of the time and date of a visit
- d. arrange appointments at a time convenient to the customer when requested to do so
- e. always act in a courteous and respectful manner
- f. leave a property when requested to do so by the occupant in accordance with applicable laws
- g. ensure monies collected by field collectors are remitted securely and in accordance with timelines agreed with the client
- h. regularly audit the activity and cash handling procedures adopted by field collectors
- i. notify the client where a customer has been identified as vulnerable
- j. maintain accurate records of all visits undertaken
- k. properly record any assertion that the person being visited is not the customer and promptly report this to the client
- l. ensure information established during the visit is accurately reported to the client
- m. investigate all complaints made against staff and representatives and provide the details and outcomes of these investigations to clients



Sector specific principles

9. Debt sale and purchase

Every Member that sells debt shall:

- a. make clear to potential buyers the nature and characteristics of the debts being sold
- b. provide clear and sufficient information in order for potential buyers to form a view as to the recoverability prospects of the debts
- c. provide adequate due diligence time and resources to potential buyers
- d. once having informed a potential debt buyer that it intends to sell certain debts to it, use reasonable endeavours to complete the sale of all such debts to that particular debt buyer
- e. take reasonable steps to ensure the accuracy of data provided to potential debt buyers both pre- and post-sale
- f. promptly notify debt buyers and potential debt buyers of any inaccuracies in data or information and promptly provide corrected or alternative data, as appropriate
- g. unless the debt buyer is already in possession of the data, on or promptly following the date of completion of the sale of debts provide the debt buyer with up to date data relating to the debts, so that the debt buyer is adequately informed about the debt at the time of first contact with customers
- h. provide post-sale support and information (including documentation relating to the debt) that enables the debt buyer to respond to customer queries and reasonable requests for information
- i. ensure that any third parties instructed in relation to debts being sold are aware of any likely sale
- j. ensure that upon the sale of any debt, any third party instructed in relation to the debt immediately ceases recovery activity on that debt, unless otherwise agreed by the debt buyer
- k. not limit the scope of post-sale support or the time period during which it is available
- l. only request to repurchase accounts when necessary and proportionate
- m. handle all complaints and claims made against it by customers fairly and provide the debt buyer with sufficient information to enable it to manage the debt appropriately in the circumstances



Every Member that buys debt shall:

- n. provide debt sellers with accurate information about its business practices, where requested
- o. use data provided to it in relation to the sale of debts in accordance with any agreements it has with the debt seller, or in the absence of any such agreement, in accordance with all applicable legislation, regulations, regulatory guidance and requirements and this Code of Practice
- p. have systems and processes in place to ensure that data relating to customers is correctly uploaded so that customers are not subjected to unfair treatment by the debt buyer's incorrect use of data or use of incorrect data
- q. use recovery strategies appropriate for the nature and characteristics of the debts bought by it
- r. consider leaving paying accounts with the debt collection agency managing the debt at the time of purchase
- s. continue to report information about the purchased debts to credit reference agencies, where they have previously been reported by the debt seller
- t. provide a notice of assignment to each customer that clearly identifies the new owner of the debt and explains who will be recovering the debt
- u. provide the debt seller with such post-sale information as they reasonably require to resolve issues raised by the customer post-sale, or to fulfil the seller's obligation to supply information for judicial or regulatory purposes
- v. provide the debt seller with audit rights including access to premises, systems and records to audit the debt buyer's compliance under the debt sale and purchase agreement



Sector specific principles

10. Pre-litigation and litigation

Pre-litigation

Every Member shall:

- a. only state an intention to commence proceedings that are reasonably likely to be undertaken against or applied for in respect of the customer
- b. make clear to customers prior to issuing a claim or making an application its intended course of action and what the customers can do to prevent that course of action
- c. not mislead customers as to the consequences or inevitability of consequences arising from any legal or bankruptcy action
- d. comply with section D (“Content - Legal”) of the CSA’s Standard Debt Collection Communication Guidance document
- e. adhere to applicable pre-action protocol

Litigation

Every Member shall:

- f. resort to litigation only if appropriate non-litigious recoveries activity has been undertaken in respect of the debt
- g. commence any litigation, enforcement or bankruptcy action only if it intends to obtain the related order against the customer
- h. not serve a statutory demand on a customer unless it intends at the time of service to serve bankruptcy petition on the customer
- i. consider refraining from commencing, or consider suspending or ceasing, any legal or bankruptcy action upon identifying that the customer is particularly vulnerable and that such action would be likely to exacerbate a physical or mental health condition
- j. provide forbearance to customers as appropriate in the circumstances
- k. only impose such costs and interest on customers as it is lawfully entitled
- l. serve all appropriate statutory notices on customers prior to, during and post-litigation
- m. have demonstrable policies relating to its selection of debts and/or customers for legal and bankruptcy action
- n. comply with section D (“Content - Legal”) of the CSA’s Standard Debt Collection Communication Guidance document
- o. adhere to all relevant legislation and regulations throughout proceedings



Sector specific principles

11. Overseas and collection recovery

Every Member that sells debt shall:

- a. adhere to the jurisdiction of the country in which the Member is undertaking debt collection activity
- b. consider and adhere to any local regulatory guidance on debt collection within the country they are attempting to collect unpaid accounts
- c. adhere to Principle 8 of the Data Protection Act 1998, and have appropriate controls in place to ensure the safe transfer of data
- d. maintain all relevant licenses, permits and registrations of the jurisdiction in which the Member is undertaking collection activity
- e. respect the prevailing time zones of the country the Member is calling when making telephone calls to customers or their representatives
- f. take account of statutory and other local market holidays when making contact with customers or their representatives
- g. be willing to accept payment in any reasonable and non-sanctioned currency
- h. use a recognised exchange rate provider when converting payments or when payment plans are being set
- i. respect the language preferences of the customer relative to the jurisdiction
- j. have the capability to provide written communication to the preference of the customer relative to the jurisdiction



Sector specific principles

12. Commercial collection

Every Member shall:

- a. adhere to the principles of this Code of Practice when collecting unpaid accounts from businesses
- b. make clear all costs and charges added to debts, including the legal or contractual basis for any interest applied
- c. consider the FCA Handbook, and any other relevant guidance, when communicating with businesses
- d. have in place an adequate complaint handling process which includes referral to the CSA complaints scheme

Helpful information

This section contains helpful information for Members and consumers including contact details for the Association, free debt advice organisations, credit reference agencies and regulators in the United Kingdom

Introduction

All Members who have registered with the Association will gain access to guidance relating to legal and regulatory compliance, training and initiatives and the latest news about the industry and the Association.

The Association operates a number of initiatives which are designed to enhance Members' compliance with the sector standards, including:

Collector Accreditation Initiative

The Collector Accreditation Initiative (CAI) is an annual, online test designed to assess and test collectors' and supporting employees' knowledge and scope of understanding regarding compliance in the industry, encompassing individual awareness of regulatory guidance and legislation. For more information, you can access the members' section of the CSA website.

Continuous Improvement Programme

The CSA runs an audit initiative which is designed to ensure compliance standards are adhered to and can be audited against the compliance standards expected in the sector. The audit is undertaken by PricewaterhouseCoopers (PwC) who provide an impartial and thorough view on measuring Members' level of compliance.

Level 3: Diploma for the Debt Collection Industry

The CSA Diploma is an accredited qualification that focuses on developing a knowledge-based and professionally qualified industry, driven by the ethos of compliance. For more information, you can access the members' section of the CSA website: www.csa-uk.com

Members' area on CSA website

CSA Members have access to an exclusive area within the CSA website where they can view and download important guidance, advice and news.



Helpful information

for consumers, their representatives and individuals

Introduction

The Association appreciates that it may be daunting to deal with creditors and their agents when you are experiencing financial difficulties or when you are contacted to repay a debt. Our Members agree to conduct themselves with the best practice described in this Code of Practice. You should be confident of a fair conversation with our Members, and we recommend that you discuss your account with them openly and enable them to understand your financial circumstances. This will enable fair decisions to be made about your account, and give you a line of contact if you have a later change of circumstances or have any questions about your account.

We always recommend that you deal with the business that is contacting you first and, if necessary, that you seek independent advice or assistance. It is important that you receive correct advice and assistance from properly authorised people, such as the free advice organisations listed below. You should be aware that information or opinions that you may find online, such as in website forums, may appear reliable but may not necessarily be legally correct or it may be inappropriate for your particular circumstances.

The free advice organisations listed below will be better positioned to provide you with personal advice from trained staff. Some of these organisations are also usually recommended by regulators.

Free advice organisations

Citizens Advice

For advice and information on debt and other topics, visit your local Citizens Advice Bureau

www.adviceguide.gov.uk (England and Wales)

www.cas.gov.uk (Scotland)

www.citizensadvice.co.uk (Northern Ireland)

National Debtline

For debt advice and information if you live in England, Wales or Scotland.

0808 808 4000

www.nationaldebtline.co.uk

Advice4DebtNI

For debt advice if you live in Northern Ireland.

0800 917 4607

www.advice4debtNI.com

Money Advice Scotland

To find contact details for debt advice in your local council area in Scotland.

0141 572 0237

www.moneyadvicescotland.org.uk

StepChange (formerly Consumer Credit Counselling Service)

For debt advice throughout the UK.

0800 138 1111

www.cccs.co.uk

Advice UK

For regionalised debt advice.

www.adviceuk.org.uk

Pay Plan

For debt advice throughout the UK.

0800 280 2816

www.payplan.com

Money Advice Service

Government funded advice and signposting for debt advice.

0300 500 5000

www.moneyadviceservice.org.uk

Trading Standards Service

Contact your local Trading Standards office.

www.direct.gov.uk

Community Legal Advice

If you qualify for legal aid.

0845 345 4345 for free advice

www.communitylegaladvice.org.uk

Information Commissioner's Office

The Information Commissioner's Office (ICO) is the UK's independent authority set up to uphold information rights in the public interest, promoting openness of public bodies and data privacy for individuals. The ICO provides guidance to help individuals understand what data protection, freedom of information and related legislation mean to you.

For all enquiries, guidance on the work of the ICO and to report data protection issues:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

0303 123 1113
casework@ico.gsi.gov.uk
www.ico.gov.uk

Credit reference agencies

Credit reference agencies obtain information from creditors to help other creditors make decisions about granting and recovering credit from consumers. Some of this information will be stated in the credit file the credit reference agency maintains about you. You can ask the credit reference agencies for a copy of the credit file they hold about you. They may charge a fee for this service. If there is anything incorrect on your credit file, you can ask them to add a Notice of Correction. The details of the UK credit reference agencies are as follows:

Experian Plc

Credit Expert
PO Box 7710
Nottingham

0844 481 8000
www.experian.co.uk

Equifax Limited

Credit File Advice Centre
PO Box 1140
Bradford
BD1 5US

0207 298 3000
www.equifax.co.uk

Callcredit Limited

Consumer Services Team
PO Box 491
Leeds
LS3 1WZ

0845 366 0071
www.callcredit.co.uk

Financial Ombudsman Service

The Financial Ombudsman Service (FOS) is the official independent expert in settling complaints between consumers and businesses providing financial services.

For all enquiries, guidance or to lodge a complaint about one of our Members (subject to having first received a final response to your complaint from the Member and meeting certain other conditions described in the rules published on the FOS website) contact:

Financial Ombudsman Service
South Quay Plaza
183 Marsh Wall
London
E14 9SR

0800 023 4567
complaint.info@financial-ombudsman.org.uk
www.fos.org.uk

CSA

complaints procedure

How we deal with your complaint

All complaints must be submitted in writing, with a signed complaint form. We require the form to be signed so that we, and our Member, have the requisite authorisation to share information.

The following is the sequence of events after the CSA receive a complaint form;

- CSA receive a signed complaint form
- CSA register the complaint and send a copy to the relevant Member company
- The Member is given four weeks to respond directly to the complainant
- CSA get a copy of the response from the Member company
- CSA considers both positions and determines whether the Code of Practice has been breached
- Appropriate action is taken (if required) to remedy the situation
- If further information is required the CSA contact the relevant party (the complainant or the Member company)
- After a full review, the CSA provides a formal response to the complainant

If you remain unhappy with the outcome of the complaint, you may have justification to escalate the matter to our our head of compliance, Claire Aynsley, claire.aynsley@csa-uk.com.

Please note: The CSA can only intervene when;

- a Member company is in breach of the Code
- the company is a Member of the CSA (we cannot act when the complaint is about the client of a Member company, for example, a bank or a building society)
- the information supplied by a Member company appears from the facts to be incorrect

Methods of contact

You can send a scanned (and signed) copy of your complaint to us by email to complaints@csa-uk.com or daniel.spenceley@csa-uk.com, or in the post;

Credit Services Association

2 Esh Plaza
Sir Bobby Robson Way
Great Park
Newcastle upon Tyne
NE13 9BA

Credit Services Association

2 Esh Plaza
Sir Bobby Robson Way
Great Park
Newcastle upon Tyne
NE13 9BA

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E: info@csa-uk.com

W: www.csa-uk.com

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