

**lending code**  
annual  
report



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# chairman's statement



**Professor Geoffrey Woodroffe**  
Chairman  
Lending Code Group

As Chairman of the Lending Code Group, I am pleased to introduce our Annual Report for 2008, which reports on the work undertaken last year by the Group.

The Lending Code Group derives its authority from the Finance & Leasing Association's (FLA) Board and has a remit which covers all matters relating to compliance with the FLA Lending Code. The FLA Code is a self-regulatory one and its provisions require that it is monitored by the Lending Code Group, which can recommend action the FLA should take if members do not adhere to the Code.

The Group meets five times a year to monitor compliance with the Lending Code and recommend action to the Association.

# 2008 in brief

Payment Protection Insurance (PPI) remains a high profile issue within the consumer credit market and this, together with increasing activity of Claims Management Companies, were the focus of much of the work of the Group throughout 2008. These issues, along with default charges, also had a significant impact on the day-to-day running of the Conciliation Scheme.

As the need for effective self-regulation and consumer protection has gained even greater importance in the current economy, increased emphasis was placed on the Code Compliance Statement Review programme. This ensured that members were fully aware of the provisions of the Code.

These matters are considered in greater detail on the next few pages.



## consumer complaints

As well as dealing with complaints from consumers about member firms, the FLA Compliance Team also monitors their type and number and reports on them to the Lending Code Group. This information is important in identifying potential industry-wide problems and emerging trends relating both to compliance with the Code and the operation of the Conciliation Scheme. It also allows the Group to consider whether further guidance might be needed to address a particular problem.

Data on complaints provide a useful indicator to the Group of whether complaints about a particular member seem disproportionately high or whether a member might be in breach of the Code. The Group offers support to a firm's Compliance Manager in the resolution of complaints and in deciding on appropriate action.

Further detail on the complaint statistics for 2008 is given later in this report.

## chief executive annual statement of compliance

Each year, the Chief Executive Officer of each FLA member company subject to the Code must complete a Statement of Compliance. In the Statement, members provide information about how they ensure compliance with the provisions of the Lending Code across their organisations. This includes detailing any weaknesses or difficulties they may have encountered in complying with the Code.

FLA members take compliance with the Code very seriously and the responses they provide are important in ensuring that the Code remains relevant to members' businesses and that consumers can rely on its provisions. We were pleased with the excellent standard of the Statements for 2008.

Where difficulties with the Code have been identified, an action plan will be formulated and, with the assistance of the Group, the FLA Compliance Team will work with the member to ensure full compliance.

## monitoring the code

Primary tools used in the Group's work in monitoring compliance with the Code are the consumer complaints themselves and the CEO Statements of Compliance. In addition, the Group will have regard to matters raised by other FLA members and in media reports – including both national and trade press.

Inspection visits to member firms conducted by the Compliance Team together with myself and one other independent member of the Group are an integral part of monitoring compliance with the Code. The purpose of the visits is to verify the information provided by the member in their Statement of Compliance. The visit involves a review of the member's processes and meeting the staff responsible for ensuring compliance and the day-to-day implementation of the Code's requirements.

Following the visit, a report is sent to the Chief Executive Officer with recommendations for improvement, if required. In 2009, we shall be looking at developing the inspection programme to ensure that it remains highly effective.

## enforcement action

On occasion it has proved necessary for the weight and influence of the Group to be brought to bear on a member in support of the Compliance Team, when a deviation from the Code has been discovered and the member has not taken action immediately to change its policies and procedures. Where this occurs either I, or one of my independent colleagues, will accompany the Compliance Manager on a visit to the member to discuss the problem with the CEO and other staff. Alternatively, senior staff of the member firm may be invited to attend a Group meeting to explain its procedures and proposals for improvement.

The Code Group and the FLA are constantly seeking ways to ensure that it has effective tools for monitoring compliance with the Code and for tackling breaches where they occur.

We were therefore pleased with the launch this year of the FLA Disciplinary Panel. The Panel exists independently of the Code Group and will deal with major breaches of the Lending Code. More details on enforcement action are set out on page 13.

## promotion of the lending code

An important part of the work of the Group is ensuring that the Lending Code is promoted. In so doing, consumers, money advisers, consumer advisers and trading standards officers become aware of the Code and the FLA complaints scheme as means to resolve issues which may arise with FLA members.

We were pleased to receive positive endorsements of our Code from both the Office of Fair Trading (OFT) and the Financial Ombudsman Service (FOS). The FOS recently cited the FLA as the 'leading trade association in the UK's consumer credit sector' and confirmed that our Code reflects industry best practice. The OFT has also said that firms subscribing to our Code will be well-placed to comply with its proposed new guidance on irresponsible lending.

## Financial Ombudsman Service (FOS)

The FOS has had responsibility for consumer complaints concerning the credit markets since 2007. Our figures for 2008 show a slight decrease in the number of complaints received by the FLA, which may reflect consumer awareness of the FOS scheme. However, the FLA Conciliation Scheme continues to offer an important and valuable service to consumers and FLA members in the resolution of complaints. The FOS's consumer credit jurisdiction extends only to complaints from customers where the matter complained of occurred on or after 6 April 2007.

The FOS's consumer credit jurisdiction has not affected the importance of the FLA Code to members' businesses. The annual compliance statements indicate that FLA members are still very much committed to compliance with the Code and its provisions.

The FLA enjoys a good working relationship with the FOS and consumer complaints against FLA members which fall outside the FOS's jurisdiction (i.e. before 6 April 2007) are referred by the FOS to the FLA.

## the year ahead...

Looking forward to 2009, the Group's attention will remain focussed on those areas it considers require continued attention, such as customers in financial difficulty, including situations where the consumer has mental health problems. This has, of course, taken on particular importance in the current economic climate. Of equal importance is the need to ensure that clear and continual communication occurs between FLA members and their customers. Customers need to be assured that they can speak to their lender if they experience a problem or are in financial difficulties.

The monitoring of the Code will continue to be a central part of the Group's work. Codes such as the FLA's remain significant in today's regulatory environment. It is important that the Code is fit for its purpose and is adhered to by the FLA membership.

With this in mind, 2009 will see the start of the process of reviewing the Code. The FLA first published a Code in 1992 and major revisions were undertaken in 2000, 2002, 2004 and 2006. These reviews ensure that the Code remains relevant to the industry in which it operates. All Code reviews are undertaken in consultation with external stakeholders and member companies. The Group will be very much involved in the process.

## lending code group

In monitoring the Code, it is essential that the Group has strong independent involvement. To this end, the Group comprises an equal balance of representation from finance companies and independent consumer groups. Through my chairmanship of the Group, there is a majority of independent members. This means that fair consideration can be given to each matter and the needs of the consumer are properly represented. In 2008 two new independent members were appointed to the Group. It is expected that an additional member will join the Group in 2009.

## thanks

May I express my thanks to all the members of the Group, both independents and representatives of FLA members, for their invaluable support and advice throughout the year. Although perspectives differ, we seldom reach different conclusions on how to tackle problems and policy proposals presented to us.

I also gratefully acknowledge the co-operation and assistance of the Compliance Manager, Megan Charles and her Compliance Team dealing with the complaints.

Professor Geoffrey Woodroffe  
Chairman, Lending Code Group

# FLA director general's foreword



**Stephen Sklaroff**  
Director General

The UK credit industry currently faces an unprecedented amount of new statutory regulation. Against this background, the FLA Lending Code stands out as an example of effective and flexible self-regulation. The work of the Group in monitoring compliance with the Code plays a crucial role in ensuring that the Code maintains high standards. The FLA strongly supports the work of the Code Group.

Throughout the year, the Group has been instrumental in ensuring that the Lending Code continues to give consumers confidence in their dealings with our members. I would like to thank Professor Woodroffe and the rest of the Code Group for their hard work and dedication, which have helped to give the FLA Lending Code the recognition it has today.

# FLA's complaint scheme for 2008

The FLA operates two complaint schemes – Conciliation and Arbitration. Both schemes are free for consumers and open to any customer of a full FLA member provided that the complaint is not, and has not been, subject to court proceedings.



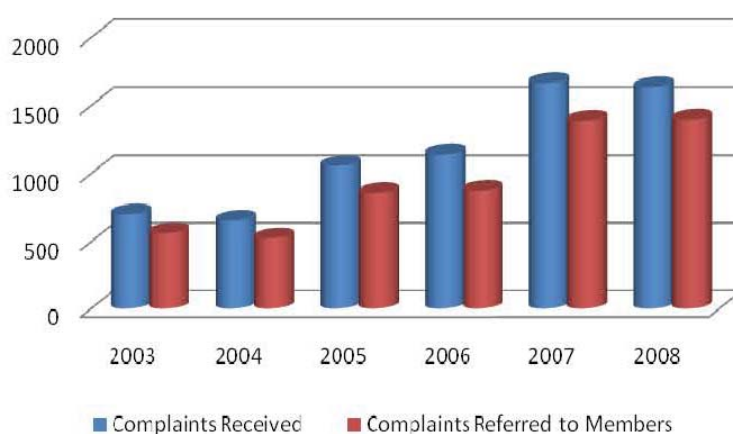
## numbers of complaints

In 2008, the total number of consumer complaints received direct by the FLA from consumers was 1638. This is slightly down on the number received the previous year (1669). However, the number of referrals to FLA members increased: 1399 were referred to an FLA member for investigation under the Conciliation Scheme (a slight increase on 2007 - 1390). In the other 239 cases, either the complainant chose not to pursue the complaint any further, or the complaint was resolved without the need for FLA conciliation.

Notwithstanding the decrease this year, the trend in complaints received was upward over the previous four years. We consider this reflects a greater willingness on the part of the consumer to exercise their right to complain and heightened media focus on the complaint channels available to consumers. In addition, FLA members are required to advise their customers of their right to refer their complaint to the FLA scheme.

The FLA also receives a number of consumer enquiries (an enquiry is any concern received from a consumer which is of a minor nature and does not constitute a potential breach of the Code). In 2008, we referred 167 enquiries to members.

FLA complaints: received and referred



Source: FLA Complaint statistics, 2008

## source of complaints

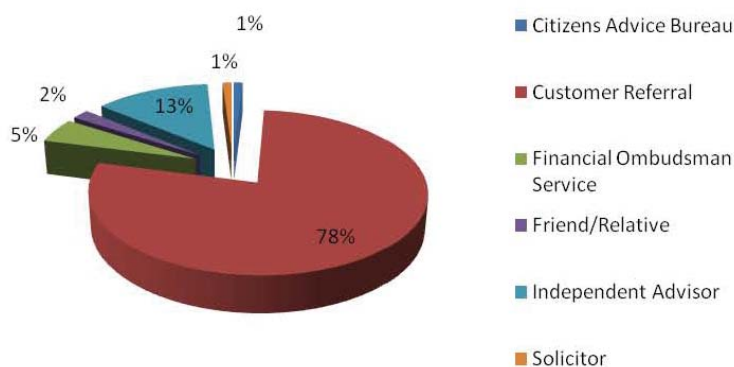
Most complaints received by the FLA are from consumers themselves. This was the case again in 2008. 78% of complaints received came directly from consumers. We are pleased by this, as the scheme is designed to be readily accessible by consumers. The 2008 figure shows a 4% increase on the number referred in 2007 (74%). This reflects a growing customer awareness of their rights.

Some complaints were referred by the FOS. We have seen a significant decrease in FOS referrals (64 complaints in 2008 compared to 304 in 2007). This is to be expected in view of the FOS's responsibility for dealing with consumer complaints.

The FLA recognises that there may be situations where customers find it difficult to talk directly to their lender and these may involve physical or mental health difficulties on the part of the individual concerned. In these cases, the FLA will accept complaints referred by relatives or friends, provided that authority for the FLA to deal with the agreement holder's nominated representative is given.

In 2008, there was a significant increase in the number of complaints received from independent advisers. This reflects the dramatic rise in the number of Claims Management Companies (CMCs) over the past few years. Together with solicitors and other independent advisers, CMCs referred approximately 14% of complaints. The Group does not wish to prevent a consumer making a complaint via any medium. As with other third party complaints, the FLA will accept these where it is clear that the representative is acting on behalf of the consumer and with their full authority.

Source of FLA complaints



Source: FLA Complaint statistics, 2008

## time to resolve complaints

The time taken to resolve complaints is important to both the consumer and the FLA. It is vital that the consumer, in approaching the FLA, is assured that every attempt will be made to resolve the complaint within a reasonable timeframe.

Of the 1,399 complaints received and processed in 2008, 1380 were resolved. This is a significant improvement on the resolution rate for 2007 (1211).

The Group considers it important to resolve complaints within satisfactory service standards and sets a target that all complaints should be resolved within 60 days. The FLA works with its members to encourage them to adhere to this time frame. We are pleased to report that the average time to resolution fell to 50 days in 2008. This is an improvement on 2007 when the average timeframe was 54 days. This improvement is due to the introduction of more streamlined procedures and better use of channels of communication, which means that the consumer can be contacted more quickly.

### Complaint resolution rates

	1 month	2 months	3 months	4 months	over 4 months
Percentage resolved - 2008	30	86	94	98	100
Percentage resolved - 2007	18	69	91	98	100

Source: FLA Complaint statistics, 2008

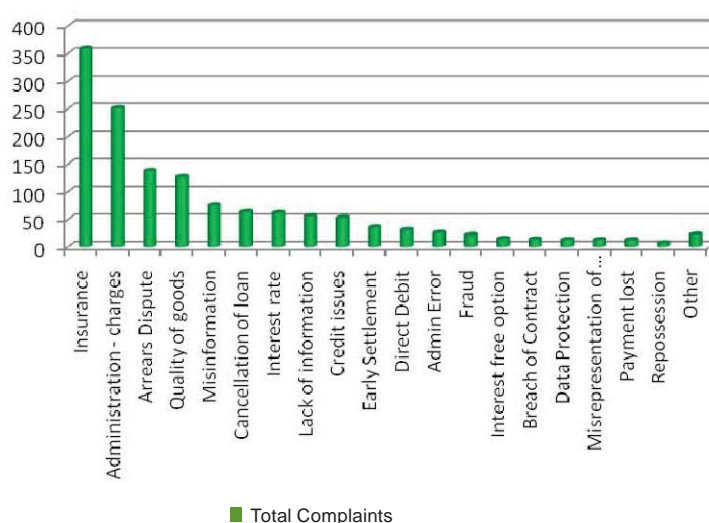
## What are the complaints about?

The type and nature of each complaint is monitored and each complaint is categorised. The main categories of complaint are indicated below. Further consideration is given to the nature of the complaints later in the report.

## arbitration cases

The second FLA scheme which deals with consumer complaints is the Arbitration Scheme. We have seen a steady reduction in cases referred to the arbitrators. No cases were referred in 2008. This was due, in part, to the rise in the number of cases being resolved at first stage under the FLA Conciliation Scheme. Cases which have been referred to the Arbitration Scheme in the past have been those where the customer has not accepted the decision reached via the Conciliation Scheme and the type of complaint is not eligible for consideration by the FOS.

Complaint categorisations



■ Total Complaints

Source: FLA Complaint statistics, 2008

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# social policy areas



## dealing with financial difficulties

The question of how to deal with customers who are experiencing financial difficulties is a key area for the Group, to which particular and continued consideration will be given.

The main category of complaint received by the FLA concerned arrears. In 2008, arrears disputes represented 10% of all complaints received placing it in third place behind complaints about insurance and administration charges.

Enhanced provisions in the Lending Code 2006 demonstrated the commitment of the FLA and the Code Group to addressing this subject. During 2008 the FLA, strongly supported by the Group, took forward a number of initiatives outlined below.

## Common Financial Statement

Another addition to the Code is the requirement for consumer finance members to use the Common Financial Statement (CFS) or a similar mechanism when negotiating debt repayment plans with their customers.

The CFS is a standard template which a money adviser may use to calculate debt repayment proposals when a customer is in financial difficulty and wishes to offer a reduced monthly repayment. It also standardises the way money advisers and creditors communicate with each other. We are pleased to note that the majority of our members, in their CEO statement returns, reported that they had already incorporated the use of the CFS into their procedures.

The Code Group continues to monitor compliance with these provisions and supports the FLA in its work on financial difficulties.

## Good Practice Guidelines

The Code is designed to be flexible and capable of responding to areas of concern and regulatory change. Mechanisms built into the Code permit supplementary guidance to be issued throughout the year which can then be incorporated during later formal revisions of the Code. In 2008, in response to concerns about the economic climate and in particular the effect on home owners, the Good Practice Guidelines were published for use by second charge mortgage lenders.

The new Guidelines supplement the Code, which requires member companies to treat customers in difficulty sympathetically and positively. The Guidelines set out the following key commitments:

- To strongly encourage customers to seek free and independent money advice.
- To discuss a repayment plan which is realistic, taking into account the customer's individual circumstances.
- To ensure that the customer has a contact point who can answer their questions.
- Not to take possession action where a reasonable repayment plan has been agreed and the customer is sticking to it.

The number of complaints relating to repossessions remained low in 2008, representing 1% of complaints. The Good Practice Guidelines were welcomed by the Treasury and the Office of Fair Trading.

## default charges

We continued to receive complaints about default charges. These relate to contractual fees imposed by the lender for failure by the customer to meet their contractual obligations. In 2007, there was a significant rise in this category of complaint (up from 6% in 2005 to 15% in 2007). This upward trend continued in 2008 with complaints about default charges representing 18% of complaints handled by the FLA.

The Lending Code encourages clear communication between members and their customers with regard to providing information about default charges and also where a customer falls behind in their payments. It is hoped that in doing so arrangements can be made before the application of any such charges results in increased difficulties for the customer.

The Annual Compliance Statement requested specific information about these Code provisions. The information that FLA members are providing to customers indicates that FLA members are committed to a policy of transparency with regard to default charges.



Download a copy of the  
**Good Practice Guidelines**  
at [www.fla.org.uk](http://www.fla.org.uk)

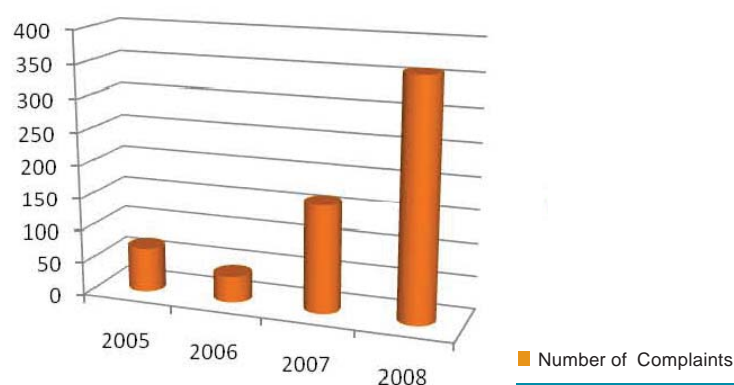
## insurance

Payment Protection Insurance remained one of the key issues in 2008 within the financial services industry.

Complaints about Payment Protection Insurance represented the largest number of complaints handled by the FLA in 2008. At 359, PPI complaints represented over a quarter (26%) of all the complaints handled last year.

Throughout the year the Financial Services Authority (FSA) continued to drive forward its campaign to improve standards in the selling of general insurance. Central to this were the Insurance Conduct of Business rules (ICOB) which set stringent procedures for intermediaries selling insurance products. Breach of the ICOB rules is an act punishable by disciplinary action in the form of fines and public censure. The regulatory work of the FSA in this area continued in 2008, with the strengthening of the ICOB rules for PPI.

### Insurance complaints



Source: FLA Complaint statistics, 2008

The most common complaint made to the FLA in respect of general insurance involved the complainant alleging that their insurance product had been mis-sold. This translates into a number of common complaints including:

- that they are not covered by their insurance policy when they have been given the impression at the point of sale that they would be;
- that they have been told that insurance is compulsory when taking out the loan; and
- that they have been sold insurance when they did not request it.

Another area of dispute involved the issue of insurance premiums which are funded as part of the loan (i.e. a one-off payment is added to the outstanding loan).

This relates to the situation where the customer settles or ends the agreement early but finds that they are not necessarily entitled to receive a proportionate rebate of the insurance premium. The majority of FLA members now provide some form of rebate to customers who settle their loans early. Many FLA members are also working to develop fairer and more transparent rebate systems.

Consumer education in this area is important. In 2008, the FLA published A Consumer Guide to Payment Protection Insurance. The leaflet explains how PPI works and advises customers on what they need to ask the seller to ensure the product is suitable for them. The Guide was endorsed by the Code Group.

# case study: a Payment Protection Insurance (PPI) complaint

A customer contacted the FLA when, after reviewing their loan agreement, they found that they had been paying payment protection insurance premiums for some time. The customer had been told when they had taken the loan that a one-off payment would be made towards insurance. The company initially refused to pay compensation as it claimed it had evidence of the complainant's acceptance of the PPI. However, following intervention by the FLA, the company refunded all the premiums that the customer had paid, in addition to the interest as it was unable to produce the evidence on which it had based its response.

## communication with customers

Clear communication with customers is an important tenet of the Code. Poor communication is always problematic and can result in a large number of complaints.

Complaints under this heading focussed on misinformation and misrepresentation such as:

- the incorrect recording of information on a customer's file;
- the failure to issue documentation that a customer has requested; or
- a customer being told that their account has been settled in full and then later told that they still owe money.

Together, these categories accounted for 12% of FLA complaints in 2008. Lack of communication can also lead to dissatisfaction at any point in the lifetime of an agreement, from marketing and sales to customer service and settlement/termination procedures.

The Group is always concerned when a complaint is concerns an FLA member not replying to letters, responding to questions or returning calls to customers. These are issues which should be resolved easily and, more importantly, prevented through customer service training and development.

The 2008 CEO Statement asked specific questions about the training staff receive in relation to the Code. We were pleased to see that the majority of members have in place effective measures to ensure their staff are trained on the Code and remained up-to-date with changes.

The essence of the Code is clear communication between members and their customers. There are, for example, provisions relating to information which should be provided both before and when someone becomes a customer, general handling of customers agreements and complaint resolution. The Code builds upon these requirements, which we hope will improve relationships between members and their customers.

On occasion, mistakes are made as a result of the actions of third parties such as bank branches, suppliers or brokers. The Code requires that members conduct business with suppliers and brokers in a way that maintains high standards. Where problems do occur, the FLA relies on the assistance of the member to liaise with the third party so that a reasonable resolution can be reached.

The Group also encourages members to monitor these complaints so that difficulties with particular suppliers can be addressed and any procedures amended as necessary. Many members have specific procedures and departments to deal with such complaints. The Group is aware that members liaise closely with credit brokers, dealers and other point of sale staff with the aim of ensuring that customers are fully briefed when being sold products.

This is an important area, given its potential to impact on other areas of complaint. The Group will, in the course of its work, continue to identify and monitor areas where it feels more guidance is required.

# case study: communication with customers

A customer contacted an FLA member about the warranty agreement for his vehicle. He was told that his vehicle was covered for 'wear-and-tear' damage but not manufacturing faults. Later, when his car sustained what he believed was 'wear and tear' damage, he contacted the member but was advised that his policy only covered manufacturing faults, and did not cover wear and tear damage.

The customer was concerned about the contradictory information and when he was unable to clarify the matter with the member, he contacted the FLA. Although it was later confirmed that the damage to the customer's vehicle was not covered by his policy, the company gave the customer a goodwill payment of £100.

## enforcement action

The FLA's Articles of Association set down the procedure for handling non-compliance with the FLA's Lending Code. Members agree to these articles as a condition of their membership. Any instance of non-compliance with the provisions of the Code will be drawn to the attention of the member concerned by the FLA. In all cases, non-compliance is reported to the Lending Code Group. Where a potential breach has been identified, this may result in further monitoring of complaint levels by the Compliance Team. Where sufficient evidence has been collected to conclude that a breach of the Code has occurred, discussions are held with the member to agree corrective action.

There are a number of courses of action at the Group's disposal depending upon the seriousness of the breach. These range from the Compliance Manager writing to or visiting a company to the Director General intervening in the same way.

They may also include:

- compliance visits (as separate from the monitoring visits outlined in the Chairman's statement);
- written warnings to members;
- requests for written submissions to the Group;
- meetings to discuss non-compliance.

The Group may refer a serious breach of the Code to the FLA Disciplinary Panel or ultimately, the Board for consideration. This can ultimately result in expulsion from the Association.

## FLA disciplinary panel

The Lending Code Disciplinary Panel ("the Panel") is a committee of the FLA Board which deals with disciplinary matters arising out of non-compliance with the Lending Code. The Panel is independent of the Lending Code Group and will only convene after an investigation has been conducted by the Lending Code Group and an attempt made to resolve the issue in question.

The Panel is comprised of five members – two members of the FLA Board and three independent members.

A matter will be referred to the Panel when the Lending Code Group has reasonable cause to believe that there has been a significant breach of the Code, which the member company has failed or refused to remedy to the satisfaction of the Lending Code Group; or where it is considered that the actions of the member company have or may result in serious consumer detriment or significant reputational damage to the Code.

If a member is found to be in breach of the Lending Code, the Panel may:

- Impose either a formal or an informal warning;
- Make recommendations as to future conduct;
- Recommend to the Board that the member is expelled from the Association.

## enforcement action in 2008

In 2008, the Code Group dealt with the following matters with individual members:

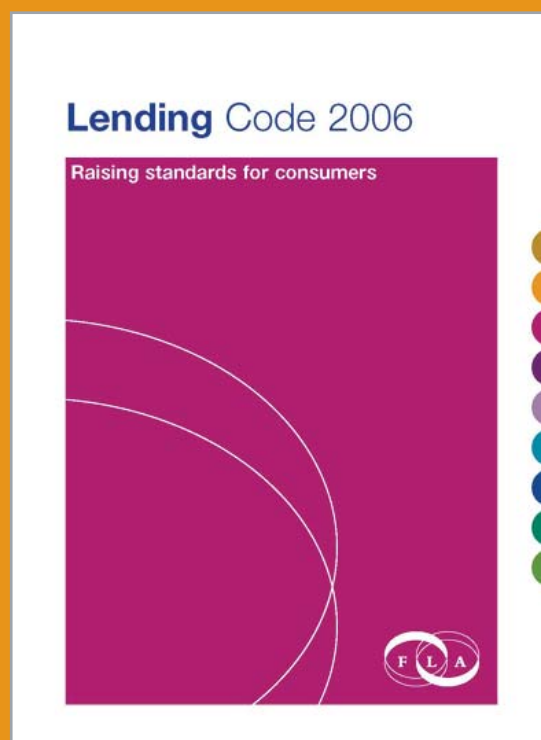
- Code non-compliance in respect of interest option loans;
- Non-compliance with the provisions relating to the sale of general insurance (i.e. PPI).

These issues have been addressed by the members concerned.

Various other member companies also received written correspondence from FLA's Compliance Manager about issues identified in their CEO Annual Statement of Compliance. These issues were as follows:

- a) A failure to provide staff with refresher training on the Code.
- b) A failure to advise customers of their right not to receive marketing information, if they do not want it.

With regard to both of these breaches of the Code, the Group has since been advised by the relevant companies that they have implemented the necessary procedures to ensure these requirements are met in the future.



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# The lending code group comprises:

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## independents

**Professor Geoffrey Woodroffe (Chairman):**

Geoffrey is a Solicitor. He was until recently Director of the Centre for Consumer and Commercial Law Research, Brunel University and was formerly Principal of the College of Law, Chester. He was a Director of the National Consumer Council and the Funeral Ombudsman. He is a consultant with Which?, the OFT and BERR.

**Helena Wiesner:** Helena is a consumer affairs specialist, with particular emphasis on financial services. She is currently a Council member of the Council for Licensed Conveyancers and was previously Deputy Chairman of the Personal Investment Authority. She has served as a Director of the National Consumer Council, Financial Ombudsman Service and the Investors Compensation Scheme.

**Rachel Fry:** Rachel Fry has worked in the voluntary sector for 25 years and more recently in the advice sector. She has worked freelance for the last three years delivering training, and co-ordinating a UK wide strategy to provide training for Money Advisers on behalf of a partnership of seven National Advice providers.

**Sally Coles:** Sally Coles has been involved in and around advice work and training for 30 years. She worked for Shelter for 12 years before setting up her own training and consultancy company. Sally is a MAT and IMA approved trainer and specialises in designing and delivering training courses around best practice models. She has written various articles for advice sector journals and currently writes the abc of money advice column in Quarterly Account.

**Nick Lord:** Nick Lord has worked in the consumer advice and advocacy field for 25 years. His past posts include senior Money Advice roles at Citizens Advice and is National Lead Tutor for the Money Advice Trust. He now works as a consultant in money advice and personal finance issues. Nick is also a member of the Financial Services Authority Consumer Panel and the Solicitors Regulation Authority.

**Frances Harrison:** Frances is manager of Fairbridge West, part of a national charity that offers excluded and disaffected young people a long term personal development programme. She has previously worked in areas of consumer and financial policy and advice provision at the National Consumer Council, Citizens Advice and local authority regulatory services.

# The lending code group comprises:

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## industry practitioners who served in 2008

### **Judith Mullen**

Head of Internal Audit  
Paragon Group plc

### **Don Kilgallon**

Associate Director  
Compliance and Administration  
Capital Bank Motor plc

### **Steve Harwood**

Head of Audit and Compliance  
Picture Financial Group Ltd

### **Chris McAteer**

Compliance Manager  
MBNA Europe Bank Ltd

### **Richard Tatford**

Credit Operations Director  
GMAC (UK) plc

### **Mike Rees**

Head of Technical Compliance  
HFC Bank Ltd

### **Elizabeth Mullins**

Head of Compliance  
Close Motor Finance Ltd

### **Gillian Myers**

Regulatory Manager  
Barclays Partner Finance

We would like to extend our thanks to Michael Rees, Don Kilgallon and Steve Harwood who resigned as members of the Lending Code Group in 2008.

## FLA staff

### **Megan Charles**

Compliance Manager

### **Hanifa Teladia**

Code Administrator

finding  
out about  
FLA's  
conciliation  
and  
arbitration  
scheme

If you have a complaint against a member of the Association or would like to find out more about the conciliation and arbitration scheme, please contact us:

Finance & Leasing Association  
2nd Floor  
Imperial House  
15-19 Kingsway  
London  
WC2B 6UN

Telephone: 020 7836 6511

Fax: 020 7420 9600

Email: [code@fla.org.uk](mailto:code@fla.org.uk)

Website: [www.lendingcode.org.uk](http://www.lendingcode.org.uk)

If you need information in a different format (for example, audio tape or different language) please let us know.