

transparency and the Financial Ombudsman Service



publishing ombudsman decisions: *summary of responses*

January 2012

1. introduction

We published [publishing ombudsman decisions: next steps](#) in September 2011 – in response to the Government’s proposals to require us to publish the final decisions of our ombudsmen. The Financial Services Bill, including this requirement, has recently been introduced into Parliament.

The discussion paper set out our initial thoughts on how we might publish decisions in practice. We proposed that we should publish in full the final decisions made by our ombudsmen – but excluding any information that would identify the consumer (including the consumer’s name) and subject to various other safeguards – for example, to protect against the disclosure of genuinely confidential commercial information.

We invited comments from stakeholders on a number of practical issues about how we should best go about publishing final ombudsman decisions. There is a list of the questions at *annex A* of this document. We have also had discussions with a range of trade associations, industry practitioners and consumer groups.

As we made clear in the discussion paper, we will not be able to decide how we will publish ombudsman decisions until Parliament itself has formed a clear view on this – which we believe will be informed by the feedback we have received. We therefore think it would be useful to summarise at this stage the feedback we have received to our discussion paper, so that Parliament can consider the Government’s proposals with a better idea of what it might mean in practical terms.

We hope that this paper will give Parliament confidence that, should it decide to enact the proposals, we would be in a position to implement them promptly, having carefully considered all the issues.

We received responses from a wide variety of stakeholders. Overall our stakeholders were largely supportive of our approach, noting that increased transparency about the ombudsman’s approach to cases could help consumers and financial businesses alike avoid unnecessary complaints – and should also enhance the accountability of the ombudsman service.

Of the questions we raised, the one that generated the most debate was whether the names of financial businesses should be published. Many, but not all, businesses expressed some concerns about the consequences this might have for them – while consumer and other groups were strongly supportive of our proposed approach.

On this issue we noted in the discussion paper that it was not practical to publish full decisions without business names and without information that would enable the business to be identified. Consumer groups and others (including some financial businesses) highlighted the potential benefits of publishing the names of financial businesses.

Having considered the responses we received on this and on the other main points in the discussion paper, our current view is that the overall way forward that we proposed is broadly in the right direction – subject to any operational and practical questions being resolved. However, there remain issues that we will want to discuss with businesses and consumer groups, before finalising how we will implement publication. We plan to maintain this dialogue with stakeholders as the Bill progresses through Parliament.

In total we received 55 responses to the discussion paper. Of these, 41 were from financial businesses and business representatives, four were from consumer groups, four were from individuals and claims-management companies, and six were from other bodies.

There is a list at annex B of the people and organisations who sent us responses that were *not* marked confidential. Their individual responses can be downloaded from the online links in that annex.

In this paper we summarise the responses we have received from stakeholders on each of the questions set out in our discussion paper. Although it is not possible to describe all of the responses in detail, we believe that this fairly reflects the views of respondents. While our current assessment is that the discussion paper moves us in the right direction, we have not reached final views on all the issues raised in responses.

So we have not included at this stage our *formal* response to the issues raised.

We hope that the discussion paper and the responses to it – summarised in this paper – provide helpful context for Parliament as it discusses the Government's proposals in the Bill. Depending on Parliament's eventual conclusions, we will set out in detail later in the year our formal responses to all of the points raised and explain how we intend to publish ombudsman decisions.

2. summary of responses to our discussion paper: our overall approach

question 1

Do you agree with our overall approach? Are there other considerations we should bear in mind, in approaching the publication of our ombudsman final decisions?

In the discussion paper we explained that we see publishing ombudsman decisions as just one part of our wider commitment to enhancing the accessibility and transparency of the ombudsman service.

There was overwhelming support across all groups who responded for the wider work we do to increase our openness and transparency. Many supported our view that publishing ombudsman decisions should be one of many ways in which we share our approach and work with consumers and businesses, and that existing methods of sharing information should continue – for example, publishing our general approach in [our online technical resource](#) and summaries of cases in [ombudsman news](#).

Consumer groups, individuals and some businesses welcomed the proposal to publish ombudsman decisions, saying that this would benefit consumers, their advisers and businesses alike. One business commented that the opportunity to review ombudsman decisions involving other businesses would help it to reflect the approach taken by the ombudsman service more closely. And the Lending Standards Board said that publishing ombudsman decisions would inform its risk model and help its compliance monitoring work. A few businesses, however, questioned the incremental benefit of publishing ombudsman decisions.

In planning how we might publish ombudsman decisions, we said that we wanted to take into account fully not only the importance of being clear and open about what we do but also the need to:

- maintain an accessible, prompt and informal system of dispute resolution;
- protect the personal information that we hold;
- avoid placing information in the public domain that could help financial crime or limit our ability (or that of others) to handle cases fairly;
- minimise any additional costs of handling and publishing data and resolving disputes;
- comply with the legal and regulatory requirements that apply to our handling of information (including the *Data Protection Act* and the *Freedom of Information Act*); and
- help financial businesses and consumers reach informal and fair settlements where disputes arise.

There was widespread agreement that publishing ombudsman decisions should not deter us from performing our core functions, in particular, those of providing an accessible, prompt and informal service and of protecting personal information. Many of those who responded also felt that any additional costs should be kept to a minimum.

question 2

Do you agree that we should not publish the views of adjudicators – instead limiting the publication of decisions to those made by our ombudsmen?

We said that it was our firm view that publication should be limited to the final formal decisions made by our ombudsmen – and should not include the final letters sent to consumers and businesses by our adjudicators (which in the discussion paper, and in this paper, we call “views”). We explained that the views of adjudicators should not be published, as this was likely to impact negatively our ability to provide an informal and prompt service, to increase our operating costs, and to risk reducing our accessibility.

We suggested that, as an exception, we might publish a handful of cases each year, to share with consumers and businesses our developing work on specific “lead cases”, where it was beneficial to do so.

A majority of businesses strongly agreed that adjudicators’ views should *not* be published. Some consumer groups – while seeing advantages in publishing adjudicators’ views (because this would give a fuller view of the ombudsman service’s work) – also thought, on balance, that they should *not* be published. It was felt that this would add significant and unwelcome costs, while providing marginal incremental benefit to consumers and businesses.

Several businesses commented that they were required (under [DISP 1.3.2AG](#) of the FSA’s *Handbook*) to analyse ombudsman decisions to extract any learning – but they were *not* required to do so with adjudicators’ views. They felt that if adjudicators’ views were available alongside ombudsman decisions, this could confuse businesses. One business said that, if adjudicators’ views were published routinely, businesses would be more likely to refer their cases to an ombudsman.

Several businesses suggested that ombudsman decisions would have to be drafted in a way that was sufficiently clear, possibly by including a summary of the relevant adjudicator’s view. There was widespread support for the publication of “lead views”, where it would be beneficial to do this.

One response suggested that – in addition to publishing adjudicators’ views – we should also publish a summary of advice given by our front-line customer-contact staff.

3. summary of responses to our discussion paper: issues for consideration in publishing decisions

question 3

Do you agree that our published reports on cases should *not* normally be specially commissioned summaries, but the actual determination made by the ombudsman (subject to the appropriate safeguards)?

We explained that our preference was to publish the actual determination made by the ombudsman, subject to appropriate safeguards (as set out in chapter 5 of the paper). We noted that, while there may be benefits in summarising some determinations (for example, where the case was complex), we already regularly provided case summaries in [ombudsman news](#) – and that routine summarising of cases would lead to increased administrative cost.

The majority of people who responded to the consultation agreed that *actual* determinations should be published. Several businesses commented that, for complex complaints involving “suitability” issues, the detail of the case would be necessary to ensure that the basis of the ombudsman decision can be understood. Some suggested that ombudsman decisions should be written in a way that was clear enough *not* to require a specially commissioned summary, even after redactions.

One business said that all representations from the parties should be published alongside the ombudsman decision, in order to provide a complete picture. On the other hand, another business suggested that ombudsmen should include in their decisions only matters that were relevant to each decision.

On the question as to which ombudsman decisions should be published, the majority of the people responding to the consultation, including those who responded on behalf of businesses, agreed that *all* ombudsman decisions should be published, in order to provide a complete picture.

However, a few businesses suggested that these should be limited to certain types of decisions – for example, cases where the ombudsman decision differed from the adjudicator’s view, decisions against businesses that involved amounts over a certain value, or situations where the business had over a certain number of cases.

One business suggested that, in cases where the event complained about was no longer “relevant” (for example, where regulation has changed, or where the business has rectified the error), the decision should *not* be published, in order to prevent “mass claims”.

4. summary of responses to our discussion paper: about our approach to safeguarding confidential information

question 4

Overall do you think our proposed approach strikes the right balance between transparency, protecting genuinely confidential information and the costs of implementation?

question 5

Do you think the steps we propose are sufficient to protect consumer identities and personal information – or are there other specific steps we should take?

question 6

Do you agree that we should not seek to protect the identity of financial businesses? If you disagree, what other steps would you want us to take?

question 7

Do you agree with our planned approach to the identities of third parties – including other financial businesses, professionals, other representatives and third-party businesses?

question 8

Do you agree that we should reserve the right not to publish certain decisions – or to exempt information in other exceptional circumstances?

question 9

Are there other considerations about safeguarding personal information that are not covered in this paper and that we need to take into account?

In the discussion paper we said that we fully agreed with the government's clarification that, in publishing decisions, we should not include the name of the consumer or details which, in our opinion, would be likely to identify the consumer. We concluded that we should disguise the identity of consumers, disguise or delete other information that would be likely to identify the consumer, and in exceptional cases (where the risk of identifying the consumer from the facts of the case was significant) reserve the right *not* to publish a decision.

We suggested that – while it would not normally be necessary for any specific financial information to be included in decisions – any such information contained in decisions should be removed before publication.

A majority of respondents agreed that the proposed measures would be sufficient to protect the identity of consumers and personal information. Several businesses noted that redactions should not dilute the meaning and clarity of ombudsman decisions.

A few businesses suggested that consumers and businesses should have an opportunity to review the ombudsman decision before publication, to ensure that they were content with the level of commercial and personal information contained in it.

One business thought that, if the name of a financial business were to be published, then it would be reasonable that the consumer's name should also be published. It thought that this would reduce the number of any vexatious complaints – and provide an equal deterrent to all parties from appealing to an ombudsman.

financial businesses

In the discussion paper we said that our initial view was that we should not redact the name of the financial business involved – nor seek to avoid publication of information that would identify it. We believed that in many cases, the identity of the business would often be clear from the substance of the decision itself, and attempts to disguise the business's identity could risk reducing the clarity of the decisions – and fuel public speculation and erroneous reporting, affecting a wide range of financial businesses.

We noted, however, that where the case involved information that was genuinely commercially sensitive we would have to exercise yet greater care when drafting and publishing ombudsman decisions.

Consumer groups agreed strongly that financial businesses should be named in published ombudsman decisions. A number of individuals and businesses also agreed. Several businesses noted that publishing ombudsman decisions with business names would help them understand ombudsman decisions better.

A few people who responded to the discussion paper said that, while there were normally no reasonable grounds for the identity of larger businesses to be protected, the identities of *smaller* businesses should be. It was also suggested that, as smaller businesses operate more locally, naming them may lead to the identification of the consumer. However, this view was not universally shared. Some larger businesses said they were at greater risk of brand damage than smaller businesses, as they had a larger customer base and stronger brands.

Many businesses believed that publishing ombudsman decisions showing business names would damage their reputation and brand. A few businesses said that it would not be fair to redact consumer names, but not those of financial businesses. However, several businesses thought that it would not be practical or desirable to conceal the financial business's identity, adding that publishing the name of the business would stop speculation as to who the case involved.

Almost everyone who responded to the consultation agreed with us that information that was genuinely commercially sensitive needed to be protected. A few businesses suggested that they should be given an opportunity to review decisions before publication – as only they would know what was sensitive. One business said that, while the ombudsman had discretion to edit information where appropriate (under [DISP 3.5.9R](#) of the FSA's *Handbook*), businesses were likely to consider the ombudsman's rationale for reaching the decision to be sufficiently sensitive to justify it being withheld from publication.

Another business suggested that information that could reveal credit risk or underwriting criteria should also be considered commercially sensitive. A few businesses said that information that fell under the *Freedom of Information Act 2000* exemptions should be redacted.

other persons and businesses identified in ombudsman decisions

We set out our general view that we should exercise caution in naming in the decision either *individuals* or those businesses *not* in our jurisdiction, where this might help to identify the consumer. But we said that we would not delete third-party identities routinely – unless it was fair or necessary to do so.

There was widespread support for this approach across all responses to our consultation. A number of businesses noted that the anonymity of individuals was particularly important in

the case of people providing medical and clinical information, so that open and full co-operation could be encouraged. Others commented that other third-party businesses, such as surveyors and solicitors, were regulated by other bodies and so it would be much more appropriate for their own regulatory body to deal with them.

A few businesses also highlighted the importance of not naming *other* financial businesses involved in the complaint – for example, a product provider relating to a complaint against an IFA – as the provider would not have had an opportunity to comment on the case and might still suffer reputational damage by association. On the other hand, a number of businesses said that claims-management companies *should* be named in *all* published decisions.

A majority of the responses agreed with the need for employees at businesses (who had been following directions given by senior management) to be anonymised – for example, by referring to them by their job titles. Several businesses emphasised the similar need for individual advisers not to be named, as they were not themselves regulated entities and were subject to the training and competency requirements that applied to the businesses they worked for.

A few businesses and individuals said that the names of ombudsmen and adjudicators should be published.

exceptional circumstances

We proposed that, under exceptional circumstances (for example, where publication of the full decision might prompt or inform criminal activity), we should have the discretion not to publish part or all of a decision, as provided for in the Bill. We noted that we did not think such circumstances would be at all common in practice, but that it would be right to provide for such circumstances should they arise.

The vast majority of responses supported this approach. In the interest of openness, several people suggested that the ombudsman service should provide a clear framework setting out where exemptions applied, or provide a report in our [annual review](#) or on our website of withheld decisions. One business thought that businesses and consumers involved in those decisions should be given the choice as to whether the decision should be published.

A number of businesses said that they should be given an opportunity to request that their cases be withheld from publication. One individual thought that all decisions should be published in full without exception.

5. summary of responses to our discussion paper: impacts on consumers, financial businesses and the ombudsman service

question 10

What impacts do you believe publication of decisions as we propose will have – on consumers, financial businesses and on our service?

consumers

Consumer groups welcomed the research proposed in the discussion paper. There was also agreement that the research should be repeated – perhaps every two years or so – to monitor whether the publication of decisions led to changes in the way consumers and businesses used the service.

Consumer groups felt that the publication would help consumers make better financial purchases and complaints, and that the benefit of publication would outweigh any potential negative impact on the accessibility of the ombudsman service. One business suggested that it should be made clear to consumers at the outset what would be published. A number of businesses suggested that the publication of ombudsman decisions would provide very little benefit to consumers.

financial businesses

We noted in our discussion paper that some financial businesses were concerned that publication might cause individual businesses reputational damage. We noted that all ombudsman decisions, including those decided in favour of businesses, would be published, and that our ombudsmen would be careful to limit their opinions and decision-making to the facts of the individual case they were considering.

We concluded that the fact that a decision may disclose embarrassing or inconvenient information about a financial business would not, of itself, be a reason to keep the issue confidential.

Many responses – from individuals, consumer groups and some businesses – agreed with our view, saying that businesses should not be able to hide “embarrassing” information. They said that publishing ombudsman decisions showing the identity of businesses could help financial businesses improve their service – for example, by comparing their customer service with that of their competitors.

However, many businesses argued that the potential reputational damage would be likely to outweigh any benefits of openness. A few thought that this would act as a deterrent, incentivising businesses *not* to refer their cases to an ombudsman following an adjudicator’s view, *not* to signpost consumers to the ombudsman service (breaching the FSA’s rules), or to challenge the ombudsman service more in the form of judicial reviews.

Another concern raised by financial businesses during our initial discussions was that publishing decisions would enable claims-management companies to “target” businesses and areas of complaint. In the discussion paper we noted that claims-management companies flourished in areas of widespread consumer detriment and concern, and we did not believe that the publication of ombudsman decisions would make a material difference to the ability of claims-management companies to identify new issues.

Many responses, including from businesses, agreed that ombudsman decisions would not contain any new material for claims-management companies. It was noted that many of the issues in our decisions would be historical. Several businesses thought that publishing ombudsman decisions could *deter* claims-management companies and consumers from bringing cases that were unlikely to succeed, saving the consumer, the business and ombudsman service time and effort.

However, a number of businesses said that stronger, more effective regulation of claims-management companies was needed. Some welcomed the Ministry of Justice's recent increased focus on claims-management companies and suggested that the ombudsman service should engage more with the Claims Management Regulator at the Ministry of Justice.

Several responses were concerned that published decisions might represent "case law" or "guidance". This would make it a requirement for financial businesses to consider and analyse all ombudsman decisions, resulting in significant compliance costs, especially for smaller businesses.

The FSA's rules, set out at [DISP 1.3.2AG](#), say that a business's complaints procedure "should, taking into account the nature, scale and complexity of the respondent's business, ensure that lessons learned as a result of determinations by the ombudsman are effectively applied in future complaint handling". Several businesses suggested that the ombudsman service should encourage the FSA to provide clarity on how the publication of ombudsman decisions could be expected to impact on these rules.

A number of responses suggested that all decisions should be published with contextualisation, explaining that each decision depended on the specific facts of the case and that the decisions were not always an accurate representation of the business as a whole.

One business thought that the publication of ombudsman decisions could lead to increased professional indemnity (PI) insurance costs, urging the ombudsman service to engage with professional indemnity insurers. Some businesses thought that medical specialists might try to establish a precedent for a particular treatment to be covered under a private medical insurance scheme.

our service

Almost all responses welcomed the increased accountability of the ombudsman service, saying that publishing ombudsman decisions would allow our stakeholders to analyse and challenge ombudsman decisions and adjudicators' views.

Several emphasised the continuing need for all ombudsman decisions to be consistent, with adequate processes in place to maintain a high standard both in decision writing and in redaction. A few businesses noted that, where the approach taken by ombudsmen evolved over time, this should be clearly marked.

One business said that, as more businesses would be prepared to accept adjudicators' views, greater importance would be placed on the adjudicators reaching the right conclusion.

A number of businesses were concerned that publishing ombudsman decisions would result in increased cost or time taken to resolve a case by the ombudsman service – and that any increase in costs should be met through efficiency.

Several said there was a risk that, with increased openness, the ombudsman service might come under additional external pressure to make decisions in a certain way, undermining its independence and impartiality.

6. summary of responses to our discussion paper: the timing, scope and form of publication

question 11

Do you agree with our approach to the timing of publication?
If not, when should decisions be published and why?

Many agreed with our initial view that we should publish ombudsman decisions shortly after they had been issued – for example, with a delay of around a week or so. A few thought decisions should be published after consumers had accepted the decision.

A number of businesses suggested that financial businesses should have an opportunity to view and comment on redacted decisions before publication, which would require a longer delay of perhaps a month or so. Several thought that, if a business had judicially reviewed the decision, the publication should be delayed to avoid influencing the proceedings.

question 12

Do you agree with our approach to the form of publication?

There was widespread agreement that ombudsman decisions should be available on our website. However, consumer groups welcomed our commitment to provide printed copies on request, possibly at cost.

Many agreed that ombudsman decisions should be published without individual commentary. Almost all responses agreed that the system should be designed to make it easy for users to access relevant decisions. One response suggested that the format should be reviewed regularly, to reflect changing technology and needs. A business suggested that the system should be accessible to businesses only, through a secure online portal.

Some suggested that each decision should have hyperlinks to similar decisions and any relevant [online technical resources](#). One response suggested that the ombudsman service could establish a rating or star system, to help users identify significant decisions. Another suggested an email notification service, through which subscribers could be alerted to new decisions which fell into categories in which they had registered interest.

Almost all responses agreed that the online database of ombudsman decisions should be indexed or searchable. The categories suggested included business name, brand, product, area of complaint (for example, “mis-selling”), the date the complaint was received by the ombudsman service and the complaint outcome, together with a “free text” search facility.

Some suggested that the categories should be aligned with the information we publish in our [annual review](#) and with the [complaints data we publish six-monthly](#). Several commented that the ombudsman service should engage with the FSA (and in future with the Financial Conduct Authority) so that, if the regulator decided to publish more detailed information in the future, the information would be comparable. A few suggested that a short description of each case should be provided.

Some commented that the database of decisions should be robust enough to allow usage by multiple users, and that it should be exportable to different formats – for example, “csv” or text files.

In relation to how long the ombudsman service should keep the published decisions in the public domain, one consumer group suggested that decisions should be available for at least two years. A business asked whether there would be an archive facility, especially for cases that had become “redundant” – for example, through a change in legislation.

question 13

Do you have any comments on when we should start publication of decisions – and what are your views on the publication of past decisions?

Almost everyone who responded to the consultation agreed with our view that *past* decisions should *not* be published.

The majority of responses agreed that publication should start subject to parliamentary considerations and timetable. One response suggested that publication could begin immediately, with all parties anonymised.

One business said that it might be helpful to have a trial period, during which the ombudsman service could test everything operationally, before “going live”. Several urged the ombudsman service to carry out a full “cost benefit analysis” before implementation.

question 14

Do you agree that we should adopt the same approach across all our jurisdictions – and specifically do you agree that we should cover our voluntary jurisdiction in the same way as our compulsory (FSA/FCA) jurisdiction and our consumer-credit jurisdiction?

Almost all responses agreed that we should publish decisions made under our voluntary jurisdiction on the same basis that we do in our compulsory jurisdiction. Some businesses thought that publishing ombudsman decisions might deter businesses from joining the voluntary jurisdiction.

7. feedback and next steps

We would like to thank everyone who responded for taking the time to give us their views on our discussion paper. All responses that were not marked as confidential are available from the online links at annex B of this document.

Depending on Parliament's eventual conclusions on how ombudsman decisions should be published, we will set out in detail later in the year how we intend to publish ombudsman decisions.

questions from the discussion paper: “transparency and the Financial Ombudsman Service – publishing ombudsman decisions: *next steps*”

our overall approach:

- question 1:** Do you agree with our overall approach? Are there other considerations we should bear in mind, in approaching the publication of our ombudsmen’s final decisions?
- question 2:** Do you agree that we should *not* publish the views of adjudicators – instead limiting the publication of decisions to those made by our ombudsmen?

issues for consideration in publishing decisions:

- question 3:** Do you agree that our published reports on cases should *not* normally be specially commissioned summaries, but the actual determination made by the ombudsman (subject to the appropriate safeguards)?
- question 4:** Overall do you think our proposed approach strikes the right balances between transparency, protecting genuinely confidential information and the costs of implementation?
- question 5:** Do you think the steps we propose are sufficient to protect consumer identities and personal information – or are there other specific steps we should take?
- question 6:** Do you agree that we should not seek to protect the identity of financial businesses? If you disagree, what other steps would you want us to take?
- question 7:** Do you agree with our planned approach to the identities of third parties – including other financial businesses, professionals, other representatives and third-party businesses?
- question 8:** Do you agree that we should reserve the right *not* to publish certain decisions – or to exempt information in other exceptional circumstances?
- question 9:** Are there other considerations about safeguarding personal information that are *not* covered in this paper and that we need to take into account?

impacts on consumers, financial businesses and the ombudsman service:

- question 10:** What impacts do you believe publication of decisions as we propose will have – on consumers, financial businesses and on our service?

the timing, scope and form of publication:

- question 11:** Do you agree with our approach to the timing of publication? If not, when should decisions be published and why?
- question 12:** Do you agree with our approach to the form of publication?
- question 13:** Do you have any comments on when we should start publication of decisions – and what are your views on past decisions?
- question 14:** Do you agree that we should adopt the same approach across all of our jurisdictions – and specifically do you agree we should cover our voluntary jurisdiction in the same way as our compulsory (FSA/FCA) jurisdiction and our consumer-credit jurisdiction?

we received responses that were *not* marked confidential from the following organisations and people:

1. [AEGON](#)
2. [Age UK](#)
3. [Aon Limited](#)
4. [Association of British Insurers](#)
5. [Association of Finance Brokers](#)
6. [Association of Financial Mutuals](#)
7. [Association of Independent Financial Advisers](#)
8. [Association of Mortgage Intermediaries](#)
9. [The Association of Private Client Investment Managers and Stockbrokers](#)
10. [The Automobile Association Insurance Services](#)
11. [Aviva UK](#)
12. [AWD Chase de Vere Limited](#)
13. [AXA UK](#)
14. [Baillie Gifford & Co](#)
15. [British Bankers Association](#)
16. [British Insurance Brokers' Association](#)
17. [The Building Societies Association](#)
18. [Bupa Health and Wellbeing UK](#)
19. [Citizens Advice](#)
20. [Canada Life Limited](#)
21. [Capita Life and Pensions Regulated Services Limited](#)
22. [The Consumer Council for Northern Ireland](#)
23. [Consumer Focus](#)
24. [Council of Mortgage Lenders](#)
25. [EMCAS](#)
26. [Finance & Leasing Association](#)
27. [Financial Services Consumer Panel](#)
28. [Financial Services Practitioner Panel / Smaller Businesses Practitioner Panel](#)
29. [Friends Life](#)
30. [Paul Grenet](#)
31. [Investment & Life Assurance Group](#)
32. [The Law Society of Scotland](#)
33. [Leeds Building Society](#)
34. [The Lending Standards Board Limited](#)
35. [The Society of Lloyd's](#)
36. [LV=](#)
37. [Money Advice Trust](#)
38. [The National Farmers Union Mutual Insurance Society Limited](#)
39. [Anthony Pepper](#)
40. [Pinnacle Insurance](#)
41. [Prudential UK](#)
42. [PruHealth](#)
43. [Paul Raymond](#)
44. [Royal & Sun Alliance Insurance plc](#)
45. [Royal Bank of Scotland Group](#)
46. [Reynolds Porter Chamberlain LLP](#)
47. [Saga Services Ltd](#)
48. [St James's Place Wealth Management](#)
49. [Standard Life Assurance Ltd](#)
50. [The UK Cards Association](#)
51. [Western Provident Association Ltd](#)
52. [Zurich Financial Services Group](#)