

Newsletter



Our Quarterly Newsletter

Issue 59 - AUTUMN 2011

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'High-Cost' Credit Research

The Department for Business, Innovation and Skills (BIS) has announced that it is to commission research into a cap on the total cost of credit in the so-called 'high-cost' credit market. The research, which was announced on 19 July, will focus on payday lenders, pawnbrokers and home collected credit.

Consumer Minister, Edward Davey said, *'This Government is committed to improving how people access and use credit. But if we're to have a comprehensive understanding of this, we need research into how a cap could affect consumers. I want to know what the impact of introducing this kind of cap might be. We know that intervening in the high cost credit market carries risks that we will make things worse for those we are trying to help. We do not want to force people into the arms of the loan sharks so we need robust evidence of what the impact of this proposal might be before we decide if action is required.'*

Back in July 2010, BIS and HM Treasury announced that they would be jointly carrying out a Review of Consumer Credit and Personal Insolvency, with a Call for Evidence opening on 15 October 2010. The BCCA's response to this can be found under 'Consultation Responses' in the Members Only section of our website.

According to BIS, a 'substantial' number of the responses it received asked Government to consider a cap on the total cost of credit that can be charged in the high-cost credit market. A summary of all the submissions can be found in the 'Consultation' section of BIS's website, www.bis.gov.uk, under 'Closed With Response' and by clicking on the link 'Consumer Credit and Personal Insolvency: Call for Evidence.'

The new research has now been put out to tender. It is highly likely that we will know which company is carrying out the research by the winter edition of the newsletter. We will report on any further developments at that time.

BIS has indicated that its their intention is to consult with both consumers and industry on the impact that a cap of this nature might have. The BCCA will be liaising with BIS from the outset and one meeting has already taken place.

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AGM & CONFERENCE 2011 - Please see pages 4-6 for more details

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[Because 26 occupants just applied for loans.]

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Proposal to Reform Consumer Credit Regime: Update

In the spring edition of our newsletter, we reported that a joint consultation had been launched by the Department for Business, Innovation and Skills (BIS) and HM Treasury to gather public opinion on the proposal to transfer the responsibility of consumer credit regulation from the Office of Fair Trading to the new Financial Conduct Authority (FCA).

The consultation, called 'A new approach to financial regulation: Consultation on Reforming the Consumer Credit Act,' has now closed and a decision on the proposal is yet to be announced.

A summary of the responses submitted to the consultation can be read by following the link www.hm-treasury.gov.uk/consult_consumer_credit.htm and by clicking on 'Summary of responses to consultation on reforming the consumer credit regime.' Details of the BCCA's own response to this consultation can be found in the spring edition of our newsletter.

The Government has said that it will announce its decision on which authority will take responsibility for consumer credit regulation later in the year. We will report on this when it happens.

a price comparison you may have missed...

there's never been a better time to join the many cheque cashers switching to us for their third party cheque encashment! you may be surprised at just how much you could save on your processing, not to mention the benefits of a fast 48hr turnaround of funds.

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1 fast 48hr payments

2 low commission rates

3 no lengthy tie ins



contact: David Wheeler
phone: 01923 606158
email: david@cashandchequeexpress.co.uk
website: www.cashandchequeexpress.co.uk



AGM & Conference 2011

If 2011 has proved anything, it is that nothing ever remains the same. For example, the year had barely kicked off when the new consumer credit regulations were due for implementation. Meanwhile, government were carrying out a momentous consultation on reforming the consumer credit regime. Then, in June, the regrettable decision to close the cheque guarantee scheme materialised. Thankfully, in August, the decision to keep the cheque was made after a lengthy period of uncertainty (please see page 7 for more information).

After a year of transition, it is perhaps unsurprising that 2011's conference is called, 'Managing Change.'

By way of speaker presentations, Conference will provide clarity for delegates about where the industry is at now, where it is going in the changing regulatory landscape and, most importantly, how businesses can remain compliant.

As always, there will be a trade exhibition and plenty of networking opportunities, with lunch also provided. Places are going fast so if you would like to attend please book soon by filling out the form on page 6.



You don't need cheque guarantee cards when you've got TRANSAX!

The Cheque Guarantee Card Scheme closed in June 2011, having seen declines in transactions and guarantee cards in circulation.

TRANSAX Cheque Warranty is now the only remaining warranty scheme available to retailers and financial service providers for consumer and business cheques. **If the cheque does not pay you, we will!**

We do not require a guarantee card to help verify a transaction - a Debit Card can be used instead. We refer it to the Industry Hot Card File (the official database) to ensure it is not one of the 5 million cards that have been reported lost or stolen.

We also know of 250,000 bank accounts at any one time that are under financial stress and more than 2 million stolen cheque numbers.

We back this up with our unique payment warranty. So at the time you are asked to encash a cheque, you can call your best line of defence: **TRANSAX Cheque Warranty. The solid foundation for your cheque encashment business.**

For further information, call Mike Bradley on 0845 601 4486 or visit www.fismerchantpayments.com



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AGM & Conference 2011

“Managing Change”

Wednesday 16 November 2011



Hilton Manchester Airport Hotel

8:45 – 9:30	Registration (Breakfast Baps/ Tea & Coffee – JFK Suite)
9:30 – 10:00	Annual General Meeting (AGM) MEMBERS ONLY
10:00 – 10:30	Chairman’s Address and Annual Review - Richard Perry (Chairman) and Rachael Corcoran (Chief Executive)

Pre-Lunch Presentations

10:30 – 11:05	Clare Hughes <i>‘Regulatory Roundup’</i> (McClure Naismith)
11:05 – 11:15	Richard Carter (The Nostrum Group)
11:15 – 11:45	Morning Break (Tea & Coffee – JFK Suite)
11:45 – 12:20	David Pope <i>‘The Fraudster’s Modus Operandi’</i> (192business)
12:20 – 12:30	Dale Williams (CoreLogic Teletrack UK)
12:30 – 13:45	Lunch (Main Restaurant) sponsored by



Post-Lunch Presentations

13:45 – 14:20	Susan Edwards <i>‘Online Payday Lenders: Risk & Anti Money Laundering Inspections’</i> (The Office of Fair Trading)
14:20 – 14:30	Mike Bradley (FIS Merchant Payments)
14:30 – 15:05	Carl Hackman <i>‘Debt Collection’</i> (CCI Legal)
15:05 – 15:15	Chairman’s closing remarks
15:15 – 15:45	Afternoon Tea (Hot Cookies/ Tea & Coffee – JFK Suite)

sponsored by **Business Insurance Services UK**



AGM & Conference 2011

Booking Form

Date:

Wednesday 16 November 2011

Venue:

Hilton Manchester Airport Hotel

Time:

Registration from 8:45 - AGM starts 9:30 - Conference opens 10:00

Price (VAT Included)

BCCA members £45 • Non-members £180

Number of places required

Names of **all** attendees
.....
.....

Company name

Company address
.....

Company telephone number

BCCA member(s)? YES NO

Please state any dietary requirements you have

Please find enclosed a cheque for £

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It is important that you include a suitable reference when paying this way so that we may allocate your payment accordingly.
Please tick if you will be paying by bank transfer

To secure your place, please pay at the time of booking. Please return this form, along with your cheque if applicable, to
BCCA, PO BOX 3414, Chester, CH1 9BF. A VAT receipt can be sent upon request.
Please kindly note that refunds can only be issued 14 days or more before the Conference date.



Cheque Reversal

The BCCA was delighted following the announcement in July that the Payments Council had reversed its proposal to abolish the cheque clearing system in the UK. We wrote to all our members to give them the good news which comes after tireless campaigning by the Association and others.

As we reported in the summer edition of the newsletter, the Treasury Select Committee (TSC) reopened its inquiry into the Council's proposal in April. As part of its inquiry, the TSC then held a meeting in June where representatives from the Payments Council gave evidence.

Unsurprisingly, TSC members were unconvinced by the Payments Council's arguments for its proposal. The Committee found fault in particular with the mixed messages banks had given out to their customers. It was revealed that one bank mandate even stated that 'cheques are soon to be a thing of the past', despite the Payments Council insisting that no final decision would be made until 2016.

The Treasury Select Committee published a report on its inquiry at the end of August, following the announcement of the decision, and recommended measures for improving the Payments Council. These included:-

- *The Payments Council and its members will now concentrate on improving the processing of cheques behind the scenes. This may make the cheque clearing system cheaper to operate, but it*

must also provide benefits to customers by reducing the delays and uncertainty that affect cheque payments.

- *The composition of the (Payments Council's) Board must change in order significantly to strengthen the voice of consumers among the independent members. In addition, any two of the four independent members, rather than all of them as at present, should have the right to veto over a decision of the Council.*
- *The Treasury should make provision in the forthcoming Financial Services Bill to bring the Council formally within the system of financial regulation.*
- *The Treasury should also confirm whether the current Draft Financial Services Bill contains the powers that would allow the new Financial Conduct Authority to intervene to protect bank customers by preventing cheques being withdrawn. If not, we recommend that the Government consider inserting such provisions in the forthcoming Bill.*

In its report, the Committee also refer to the abolition of the Cheque Guarantee Card, which came into effect on 30 June, as 'regrettable'. The Payments Council have announced that they will now undertake research to 'assess the impact that the closure of the cheque guarantee scheme will have on cheque usage and businesses.' The findings will be published.

Engage with our members and advertise in our newsletter

Prices start from **£175** plus VAT

For more information call Becky Lucas on **01244 505 909** or email becky@bccaco.uk





Guidance for Credit Brokers & Intermediaries



In response to growing consumer complaint levels and the 'super-complaint' issued by the Citizens Advice Bureau, in June this year the OFT issued draft guidance for credit brokers and intermediaries. The guidance also has a very clear message to lenders who use their services – you have a duty to make sure any broker or intermediary with whom you do business is compliant, and if they are found not to be, the OFT can take action against both of you.

Credit Broker or Intermediary?

The first thing to consider is what is the difference between a broker and an intermediary? They are intertwining concepts and each has a statutory definition.

Credit Brokers

Credit Brokerage, defined under section 145(2) of the Consumer Credit Act 1974 (CCA) is a form of ancillary credit business. A broker effects the introduction of individuals desiring to obtain credit to consumer credit businesses. There does not need to be any arrangement or direct connection between the person effecting the introduction and the creditor. A simple recommendation to use a particular lender, made by a broker in the course of business in response to a customer request, is sufficient. Bringing about or being the cause of an application to a creditor for credit is sufficient to constitute credit brokerage.

The guidance is also unable to provide any clear demarcation between the mere advertising of other people's credit and going beyond that to effect an introduction. A

pragmatic approach will have to be taken to identify just what service a third party is offering. If they are doing no more than passively providing information, or access to information about prospective regulated credit agreements (for example via the display of leaflets on a shop counter), then they will probably not be engaged in credit brokerage and will therefore not require a Category C credit licence. Whether they go beyond this is a matter of careful judgment taking into account the nature, content and presentation of any advertisements, and the way in which its business operates.

Credit Intermediaries

It is accepted that most businesses currently engaged in 'credit brokerage' will also be credit intermediaries under section 160A CCA which defines a credit intermediary as any person who is not acting as a creditor, and who, in the course of a trade, business or profession, for a fee, (which may take a pecuniary form or any other form of financial consideration):

- (i) recommends or makes available prospective credit agreements to consumers;*
- (ii) assists consumers by undertaking preparatory work in respect of such credit agreements; or*
- (iii) concludes credit agreements with consumers on behalf of the creditor.*

So, unlike the definition of a broker, there must be a fee for a credit intermediary – whether paid by lender or borrower. Another key difference is that no introduction need be effected for there to be an intermediary – someone who assists prospective borrowers to fill in application forms for creditors would be a credit intermediary but not a credit broker if there was no introduction of the borrower to a creditor.

For the purposes of BCCA members, in most cases, if leads are purchased or potential borrowers otherwise acquired via a third party, that party will probably be acting as a broker and an intermediary.



Responsibilities of Creditors dealing with Credit Brokers/Intermediaries

The OFT has stated in its guidance that it expects creditors to take appropriate responsibility for the activities of their credit brokers/intermediaries to ensure that they are not engaging in unfair business practices or acting unlawfully. This means that businesses must be pro-active at ensuring the third parties they are dealing with are appropriately licensed. Any agreement entered into following an introduction by an unlicensed credit broker will be unenforceable without a court order.

When selecting and monitoring the activities of third party credit brokers/intermediaries, lenders must take reasonable steps to satisfy themselves that those parties are not engaging in unfair business practices under section 25 CCA. Failure to do this will result in the creditor's fitness to hold a consumer credit licence being brought into consideration.

What to look out for:

- *Transparency is key. Credit Brokers and intermediaries must clearly disclose: their status in relation to the creditor; the extent of the service they are providing; the purpose of any fees payable and any matter that may affect the independence of the credit broker/intermediary. The OFT have expressed that this includes the commissions that are payable by the lender as well as by the borrower.*
- *Charging up front fees to customers for the promise of a loan has a greater risk of consumer detriment and there have been enforcement cases against those who charge high up front fee and deliver nothing. Consider very carefully whether it is appropriate for you to deal with such brokers.*
- *If you do decide to do business with an up-front fee charger, check that they disclose fees at the outset, as the borrower must be able to give informed consent to pay the fee. This must be agreed with the borrower in writing prior to the fee being paid.*
- *Review the credit brokers/intermediaries websites and advertisement materials: are they compliant with the guidance? Are they transparent as to the service offered? Do they disclose the fees payable and the connections to the creditor?*

- *Refunds of brokerage fees paid by a potential borrower (less £5) are mandatory where the borrower does not enter into a relevant agreement within 6 months of an introduction to a source of credit.*

The message is clear: if you are a lender dealing with third parties who may be engaging in credit brokering or acting as a credit intermediary, you must undertake due diligence at the outset of the relationship to identify who you are dealing with, ensure that they are appropriately licensed, and monitor their activities to satisfy yourselves that they will not bring into question your fitness to practice. To document all this we would advise a detailed contract is put in place with any broker you deal with.

For more information, please contact Jeanette Harwood on 0113 283 2500 or email jeanette.harwood@walkermorris.co.uk

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Big Plans for Small Business



Sara Williams is the Executive Chairman of Vitesse Media, the organisation behind numerous publications, events, research and websites that give valuable advice to SMEs. Over 2 million copies of Sara's book, *FT Guide to Business Start Up*, have been published to date and the 2012 edition is released this autumn.

Becky Lucas met with Sara to discuss her tips on running a successful business.

You founded Vitesse Media in 1997 and have had plenty of success since. What advice would you give to people looking to set up a successful business?

Try not to rush out and spend lots of money on things you think a business should have but ask yourself if you really need to have them. For example, do you really need business cards?

For many people setting up a business the first worry is where their premises are going to be. Sometimes new premises are not always necessary though as lots of SMEs can be ran online from people's homes. Suitable checks would need to be made first however.

Just getting that little bit of capital so that a business can get started is normally the biggest hurdle, particularly these days as it's really hard to get any from the banks. My husband and I have both started our own businesses and in both cases we have used savings, but unfortunately not everyone has these. There are lots of alternative sources though, for example, grants, angel investors, or even family members may be able to help.

How can an established business grow and gain more customers?

It is a difficult time at the moment for businesses to grow as

the economy itself is not growing. The main way a business could grow though is at another business's expense, for instance, if its service is better than its competitors. Some marketing would then need to be invested in to make prospective customers aware of this.

A good website is the most important and cost effective thing a business can do to market. At Vitesse Media, we are increasingly investing in websites to market our own services. We actually bought all eight of our web addresses, including SmallBusiness.co.uk, when the business first launched in 1997 and they are fantastic web addresses. We could see that, by looking at the US, the way forward was the internet so we made a strategic decision to buy the web addresses before anybody else could.

How important is networking for a business to grow?

One thing I learnt after starting my own business was the importance of building relationships and networking as it's a really important part of extending and building a business's market share. Depending on the business, a lot of this can be done through social networking sites, such as LinkedIn. I am quite active on LinkedIn and trawl through it, looking for all types of people I think I should be talking to. Networking in this way is also cost effective.

For a small business, running a networking event is quite costly. I know this because we have our own events team that organise events for us and our clients. It is quite a skilled occupation and one that would have to be treated with a little bit of caution. A business could try it out in a small way and see how it goes but I think I would be reluctant to advise people to spend a huge amount of money until they've dipped their toe in the water.

Businesses such as Vitesse Media thrive on personal contact. It's about who you know. If a good relationship is built with customers, there are a lot of incentives that can be used to keep them coming back. For example, if they introduce a friend or family member to you, they can be rewarded by being given a discount.

What's the key to a successful business?

I am a tremendous believer in cash flow planning; having a proper spreadsheet, planning out all your cash flows and monitoring your cash on a daily basis. We very closely monitor our cash flow and I think that is why Vitesse Media is still running today.

Having a good relationship with your bank these days counts for absolutely nothing. You can spend a long time



building a relationship with a bank but right now it makes no difference. They have very rigid rules and if you fall outside these rules, no matter what the relationship is like, they will drop you. When I started out the banks were actually rather helpful to small businesses but now, no matter what they say, they're not.

It is hard to say exactly why not all businesses succeed but, in essence, it is because they run out of money.

Do you think there is a difference in the small business landscape today compared to ten years ago?

Statistics show that times are getting worse for businesses but statistics also show it has never been particularly easy. The majority of businesses go bust before the end of three years which appears to be a pretty constant statistic. The landscape itself, however, has changed hugely. When Vitesse Media started out in 1997, a lot of SMEs were intermediaries, for example, insurance brokers or travel agencies. The rise of the internet has meant that a large proportion of those jobs and businesses have disappeared and people have to now think of different ways of starting a business. The first thought of someone setting up a business today would be to go online.

What advice would you give to high street retailers who are looking to protect themselves should rioting ever return?

Getting properly insured is the first step. There was a case in Hackney where a shop had been burnt down and the owner had insured the building but not the contents. If a retailer feels that they are at risk from rioting they should also ask a security expert to visit their premises to advise on what can be done to make it more secure.

**Visit www.smallbusiness.co.uk
for further business advice
and guidance**

Sara Williams Personal Profile

How would you describe yourself in three words?

Dogged, confident and articulate. If you're not dogged, you won't be able to keep a business going. You just have to keep going on and on.

What is your greatest career achievement to date?

There are two. I am very proud of the fact that I have two books that have been in publication over for twenty years and are still read by many people (Sara is also the co-author of FT Guide to Personal Tax).

Another achievement is that I own a business and that by doing so I have created jobs for 50 people. Many of my employees have been with me right from the start and are very loyal.

I always try to create a really nice atmosphere for people to work in.

If you could hire anyone in the world who would it be?

The best salesman in the world!

Do you have any business regrets?

You make lots of mistakes in business and whilst you have to learn to not be bothered by them you also have to learn from them.

I have had one dispute with an employee and although I still don't think that I was in the wrong, I do feel I could have handled the situation better so that they didn't feel so upset.

Where do you hope to be career wise in 10 years time?

I would like to be a portfolio person which would involve doing lots of interesting pieces of work.



Anti Money Laundering Consultation



Diane Williams from the compliance consultancy, The Capital Partnership, welcomes the recent consultation from HM Treasury on its review of the Money Laundering Regulations. Here, Diane explains why.

*"In June 2011, HM Treasury issued a consultation on changes to the Money Laundering Regulations 2007. It is unusual to be able to say this but the consultation does actually seem to be proposing measures which would reduce the regulatory burden on BCCA members, as well as other businesses that fall within the Regulations. Certainly that is the government's stated intention. For example, the consultation, which closed on 30 August, proposes **the removal of criminal penalties for businesses** which fail to have the appropriate systems and controls in place to combat money laundering. The intention behind this proposal is to encourage businesses and regulators to have confidence in implementing a fully risk-based approach, i.e. businesses to make their own assessment of the risks they face and implement appropriate systems and controls. To quote from the consultation, the government "wishes to discourage businesses from going further than necessary when complying with Regulations." Throughout the consultation, the government emphasises its desire for effective Anti Money Laundering (AML) practice rather than "tick-box" compliance.*

Other points made in the consultation that are likely to be of particular interest to BCCA members include:

- 1. If a lender buys debt from another lender that is supervised for AML by HMRC (HM Revenue & Customs) or the OFT (Office of Fair Trading), the buyer cannot by law rely on the seller's Customer Due Diligence (CDD) checks because reliance can only be placed on FSA-authorized businesses. The government proposes to change this so that debt buyers can rely on debt sellers' CDD.*

- 2. Currently, AML policies and procedures are not required by the Regulations to be in writing. The government is not proposing to change this at this time, but it is interested in views on whether it should in fact change this and make written policies and procedures mandatory.*
- 3. The Regulations allow businesses to keep either copies of, or details of, identity documents, and again the government is not proposing to change this because it acknowledges the practical difficulties of, and problems with, storing copies of documents such as passports.*
- 4. There is no proposal to reduce the extent to which businesses can rely on electronic verification of identity.*
- 5. On the difficult subject of Politically Exposed Persons (PEPs), the government says: "Businesses are expected to apply appropriate and proportionate checks on PEPs. This means, for example, that large and sophisticated financial businesses, dealing with high net worth individuals from around the world would be expected to recognise that they are more likely to encounter a PEP than a small provincial business dealing with customers of modest means based in the local community. Businesses would be expected to undertake checks appropriate to the risks they are realistically likely to face."*

Although not affecting BCCA members, it is interesting that, as part of its deregulatory approach, the government is proposing to take out of the scope of the Regulations: (a) what it describes as "non-lending credit institutions", in other words businesses that allow their customers time to repay their bills or fees, such as vets, opticians and gyms; (b) bookkeepers and accountants with an annual turnover of less than €15,000.

The government expects any legislative changes that result from the consultation to come into effect in 2012. Finally, it is worth pointing out that the consultation does not affect the criminal penalties for money laundering under the Proceeds of Crime Act 2002 or the obligations of businesses to report suspicious activity to SOCA."

If you would like further information, please contact Diane Williams at info@thecapitalpartnership.co.uk

The BCCA has responded to this consultation. If you would like a copy of the response, please email info@bccca.co.uk

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New 'Stop Loan Sharks' Team

Trading standards has launched the first national Illegal Money Lending Team (IMLT) to cover England. The new team will run alongside the Scotland and Wales IMLTs as part of the Department for Business, Innovation and Skills-funded project, 'Stop Loan Sharks'.

Since it was launched in 2004, the project has resulted in £38 million worth of illegal debt being written off and secured over 190 prosecutions.

By building on the successes of previous regional teams, the new national squad will investigate Consumer Credit Act offences across the country, plus any related activity involving anything from intimidation, threats or violence used to enforce payment of illegal debts, to drugs, weapons or counterfeit goods felonies, or even sexual crimes.

(Source: TS Today)



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Petition for Retailer Justice

The campaigning magazine, Convenience Store, has set up an e-petition on the HM Government website to demand tougher sentences for criminals who attack local retailers. The petition, which follows this summer's widespread rioting, asks for penalties for criminals who attack local retailers and their staff to be in line with those handed out for attacking other community workers, such as, nurses, police officers, fire fighters or paramedics.

To sign the petition, which closes on 16 August 2012, please visit
<http://epetitions.direct.gov.uk/petitions/12401>

The Prime Minister has confirmed that any e-petition gaining 100,000 signatures will be debated in the House of Commons.

(Source: www.thegrocer.co.uk)

Return of the Faceless Banks

A report by the British Bankers Association (BBA) has revealed that 187 high street bank branches closed last year – the equivalent of three a week. The disappointing figure demonstrates banks' decreasing levels of customer-facing service in recent times.

As we reported in last autumn's edition of the newsletter, the introduction of a minimum counter withdrawal in 2010 by a number of banks means that some customers have no option but to use a cash machine, even when it is not convenient.

Branch closures will prove even more detrimental to customers, particularly the elderly. Unfortunately, as online banking is not yet a widely viable alternative, many will be forced to travel for miles for even the most basic of services.

Speaking about the banks in question, Derek French, of the Campaign for Community Banking Services said,

"This time around, they are not listening at all. They give 12 weeks' notice and then they just shut the bank. They become totally intransigent, just paying lip service to the (mandatory) notice period."

(Source: www.thisismoney.co.uk)

Welsh Carrier Bag Charge



Welsh retailers must now charge their customers a minimum of 5p for every single-use carrier bag they give out. The new legislation was introduced on 1 October 2011 and will affect all retailers.

Any stores found to be giving bags away for free face a fine of up to £5,000, although a three month 'bedding in' period is currently in place to allow both retailers and customers time to get used to the new law.

The money raised from the levy is to be donated to a charity of the retailer's choice. Stores with 10 or more employees will be obliged to account for how the money raised has been used.

For more information, please visit www.carrierbagchargewales.gov.uk

We want your feedback!!

*Do you have any questions about the issues covered in this newsletter?
Do you think we missed something out that you would have liked to have seen covered?*

If so, let us know! Here at the BCCA, we are continually looking for ways to improve the service we provide and would value feedback. If you have a query or comment, no matter how big or small, please contact Becky Lucas on 01244 505 909 or email Becky at becky@bccca.co.uk



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