

Financial Services Consumer
Panel response to:
Consultation Paper 98
The Draft Mortgage
Sourcebook, including Policy
Statement on CP70

September 2001

The Draft Mortgage Sourcebook

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Statement on CP70

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Summary

- I. The Panel welcomes the Draft Mortgage Sourcebook, including Policy Statement on CP70. Given the Treasury's decision not to regulate mortgage advice (which we believe is a grave error) the FSA's proposals provide much needed consumer protection.
- II. In particular the Panel welcomes the FSA's decision to require pre-sales disclosure and to require lenders to ensure that intermediaries provide the specified pre-sales disclosure documents. But the Panel urges the FSA to require intermediaries to explain orally the importance of this pre-sales disclosure document. We do not agree that this would be difficult or expensive to monitor.
- III. The Panel agrees with the overall approach that the FSA has decided to take to the approved persons regime.
- IV. Nonetheless the Panel does have some concerns. In particular, the FSA has proposed not to make arrears managers a controlled function, having taken that view that it is likely that the policy of a mortgage lender on arrears and repossessions will be agreed at a senior level in the organisation rather than by a single manager. The Panel disagrees with this view as arrears managers normally do have a degree of autonomy in their role - for example deciding whether repayment offers are acceptable and when litigation should commence.
- V. The Panel disagrees with the decision not to introduce specific provisions to cover lending targeted at more vulnerable groups, such as people with impaired credit. The Panel would like the FSA to re-examine this issue, as it believes that it would be possible to require such lender's promotions to state clearly that the APR charged will be higher than many loans available on the market.

- VI. The Panel believes that the proposed pre-application illustration has the potential to provide consumers with valuable help when choosing a mortgage. However it is vital that the document has a standard content and length to enable consumers to compare 'like for like' mortgages.
- VII. The Panel considers that the term "lifetime mortgages" is not one that is in common usage and that consumers will not understand it. The Panel urges the FSA to conduct research to determine a more useful label for these types of mortgage. The Panel also has serious reservations with the proposal that the illustration of a 'lifetime mortgage' should be a stand-alone document completely separate from that for any related investment.
- VIII. The Panel believes that a thorough review of APR methodology should be conducted. In the meantime the Consumer Credit Act requirements should be rewritten in plain language.
- IX. The Panel believes that the FSA should be more prescriptive about the treatment of arrears and should consider the use of safe harbour provisions.
- X. The Panel considers that the records of the various documents should be kept for the life of the mortgage. Inadequate record keeping by firms has been a huge problem when trying to clear up investment complaints and scandals in the past. This type of consumer detriment is unacceptable and should not be allowed to occur again in the future.

Panel response to Consultation Paper 98: The Draft Mortgage Sourcebook, including Policy Statement on CP70

Introduction

1. This paper is the response of the Financial Services Consumer Panel ('the Panel') to the Financial Services Authority (FSA) consultation paper 98 The Draft Mortgage Sourcebook, including Policy Statement on CP70. The Panel welcomes the Draft Mortgage Sourcebook in general. Given the Treasury's decision not to regulate mortgage advice (which the Panel believes is a grave error) the FSA's proposals provide much needed consumer protection.
2. In particular the Panel welcomes the FSA's decision to require pre-sales disclosure and to require lenders to ensure that intermediaries provide the specified pre-sales disclosure documents. However, the Panel urges the FSA to require intermediaries to explain orally the importance of this pre-sales disclosure document. We do not agree that this would be difficult or expensive to monitor.

The information package

3. The Panel agrees with the FSA's high level approach to the information package and the consumer education priorities.

Financial promotions

Q1: Do respondents agree with the approach taken to the content of qualifying credit promotions? Is there anything further that should be done to address advertisements targeted at 'distress borrowing'?

4. The Panel supports the proposed wording of the wealth warning. In addition the Panel would support further consumer research into the wording, including the use of the word 'repossessed'.

5. Paragraphs 7.23-7.24 of the consultation paper state that no specific provisions will be introduced to cover lending targeted at more vulnerable groups, such as people with impaired credit histories, because of practical difficulties in identifying, by way of an objective test, the advertising on which these additional requirements should be imposed. The Panel would like the FSA to re-examine this issue, as it believes that it would be possible to require such lender's promotions to state clearly that the APR charged will be higher than many loans available on the market.

Disclosure – delivery

Q2: What are respondents' views on the rules and guidance set out at MORT 4.7? Are there other approaches to meeting the 'reasonable steps' requirements that might be mentioned in the evidential provision? Given the range of firms and processes involved, is there a case for greater specification in the guidance on a monitoring programme and what might the details of this be?

6. The Panel is pleased that the FSA has decided to require pre-sale disclosure and require lenders to take reasonable steps to ensure that intermediaries provide the specified pre-sales disclosure documents. The Panel regards this requirement as a significant consumer protection measure.
7. On the question of monitoring, the Panel believes that this should include the collection and analysis of relevant data, actual visits, mystery shopping and interviews with consumers who have completed a mortgage transaction. The Panel believes that post transaction interviews with consumers could provide an important and effective monitoring tool.
8. The Panel believes that monitoring could be outsourced to an organisation such as the Mortgage Code Compliance Board.

9. The Panel agrees with the FSA that written declarations could facilitate early disclosure, but we do not believe that on their own they are a sufficient method of assuring disclosure.

Disclosure – content

Q3: Do respondents agree with the general approach taken to pre-application illustration?

10. The FSA has decided that lenders must explain the importance of the pre-application illustration to consumers; however intermediaries will not be required to do so. The FSA has made this decision on the basis of the supposed difficulties and costs to lenders of compliance monitoring. The Panel believes that this decision contradicts the responsibility placed on intermediaries to provide the pre-application illustration. On the question of costs, the Panel believes that a requirement that intermediaries explain the importance of the pre-application illustration could be monitored by the use of mystery shopping.
11. The Panel supports the general approach taken to the pre-application illustration. However the actual content of the pre-application illustration should be reviewed to ensure that consumers easily understand it. The current pre-application illustration attempts to fulfil two different aims, firstly explaining the mortgage and all its related costs, and secondly, allowing the mortgage to be compared with other mortgages of the same sort. Both these aspects of disclosure are necessary, but these are sometimes hard to combine in practice.
12. The Panel believes that the pre-application illustration should be reviewed on a continuing basis to ensure that the documents are revised and improved.

Q4: What are the respondents' views on whether GISC requirements weaken the case for including details of optional insurance products in the illustration?

13. The General Insurance Standards Council's new requirements may result in some lenders and intermediaries acting as introducers of insurance products and so will be unable to quote for and insert details of quotations in the pre-application illustration. The Panel thinks that the inability of certain introducers to quote for insurance products would weaken the case for including details of optional insurance products in the pre-application illustration. Insurance is an important element of house buying. The cost of insurance must be included wherever possible to enable consumers to accurately assess the monthly costs of home ownership.

Q5: Given the potential drawback to the consumer being subject to repeated credit reference agency searches should the rules permit the use of such searches in order to ascertain the consumer's credit rating for the provision of pre-application illustrations?

14. Existing practices by credit reference organisations may cause difficulties and the Panel is aware that repeated searches can be an early indication of potential fraud, but it is hard to see how the FSA's mortgage rules can resolve this issue.

15. The FSA should approach the credit industry with the aim of dealing with this unfair practice at a policy level. Penalising consumers for multiple searches could be regarded as an anti-competitive measure. In addition, non-status consumers, who arguably should shop around more than the average consumer, would be deterred from shopping around.

Q6: What are the respondent's views on the proposed content of the pre-application illustration in terms of:

-whether any important information is missing?

-whether any information is included that is unnecessary?

-the ordering of information in the illustration?

16. The Panel believes that the proposed content of the pre-application illustration is appropriate. However it does think that the information could be simplified and made easier to understand.

17. The Panel believes that the information on costs and fees in paragraphs 5 and 6 should be presented on one page in a common format to enable easy comparisons of illustrations.

18. The Panel suggests that the second sentence of section 2 of the personalised illustration should be reworded so that it is clear to consumers that they have to compare 'like with like' to enable true comparisons of mortgage products.

For example 'If you are using the personalised illustration to compare mortgages it is of most help when comparing repayment mortgages with other repayment mortgages or endowment mortgages with other endowments or interest only mortgages with other interest only mortgages. To decide which type suits you best you need to consider the following;-

With a repayment mortgage you gradually pay off the amount you have borrowed as well as the interest payable over the lifetime of the mortgage.

With an interest only mortgage etc.

Q7: What are the respondents' views on whether the table should be included in the pre-application illustration?

19. The Panel considers the table is a good guide to how the product actually works. For example you can see a clear difference between repayment mortgages and interest only mortgages. However the Panel believes that the tables should not be included in the pre-application illustration but should be available in the post-sales documentation and provided with each annual mortgage statement.

Q8: What are the respondents' views on the proposed information requirements relating to foreign currency mortgages and shared appreciation mortgages?

20. The Panel regards the proposed information requirements relating to foreign currency mortgages and shared appreciation mortgages as adequate.

Q9: What are the respondents' views on the proposed information requirements for current account mortgages including the assumption discussed in paragraph 9.27?

21. The Panel would like to know whether the FSA has conducted any research to test whether its assumption (of an even spread of expenditure over a month) actually fits with consumer spending patterns. The Panel is aware that many consumers arrange for the payment of household bills to take place shortly after they have received their salary. The FSA assumption that payments from current accounts are spread evenly over the month is likely to produce an over-optimistic forecast of average account balances (and therefore interest due) if many payments are made at the beginning of the month.

Q10: Do respondents have any comments on the FSA's proposed approach to offer stage disclosure?

22. The Panel recommends that any changes in details of costs and charges between the information, offer and post sale documents should be highlighted, for example in red, to draw consumers' attention to them.

Q11: What are respondents' views on the FSA's proposals for disclosure at the start of the contract? Do respondents think that this information is important enough to make it a regulatory requirement?

23. The Panel agrees with the proposals for disclosure at the start of the contract. However information overload should be avoided. The proposed information should be a regulatory requirement.

Q12: What are the respondents' views on the proposed post-sale disclosure requirements?

24. The Panel views the proposed post-sale disclosure requirements as acceptable. However, the Panel also recommends that the tables referred to in question 7 should be included with the post-sale disclosure documents and should accompany every annual mortgage statement.

Q13: Do respondents agree with the FSA's conclusion that a pre-application illustration and offer stage disclosure document should be provided for regulated mortgage contracts when they are sold according to the process described in paragraph 9.46? If not, do respondents consider that the third option in paragraph 9.48 should be pursued and, if so, how would respondents suggest that such lending is distinguished in the rules?

25. The Panel agrees with the FSA's conclusion that a pre-application illustration and offer stage disclosure document should be provided for regulated mortgage contracts when they are sold according to the process described in paragraph 9.46.

Q14: In relation to the disclosure requirements for non-house purchase mortgages, do respondents:

-agree that the pre-application illustration should be provided for all types of loan falling within the definition of a regulated mortgage contract apart from those identified in paragraph 9.50?

26. The Panel agrees that the pre-application illustration should be provided for all except those in paragraph 9.50, which should have specific requirements.

-agree that the loans identified in paragraph 9.50 should have specific disclosure requirements?

27. The Panel agrees that the loans identified in paragraph 9.50 should have specific disclosure requirements.

-have any views on the pre-application illustration requirements specified for these loans in MORT4.6?

28. The Panel agrees with pre-application illustration requirements specified in MORT 4.6

Lifetime mortgages

Q15: Do respondents agree with the use of the term 'lifetime mortgages' and think that the FSA has correctly captured the relevant products within this definition?

29. The Panel views the term 'lifetime mortgages' as no better than those that it replaces. The term does not convey the essence of the product and it might be easily misunderstood as meaning either a standard mortgage that is simply transferred from property to property, or a mortgage that lasts for your life time.

30. The FSA should therefore demonstrate that consumers understand the term 'lifetime mortgages'. In conducting the research, the FSA should also investigate possible alternatives for example 'capital release mortgage'. Should the research show 'lifetime mortgages' as the best option, then the FSA should work with providers to ensure that it is widely adopted by the industry.

Q16: Do respondents think that the pre-application illustration for lifetime mortgages correctly reflects the products available, and meets the information needs of consumers in this sector?

Respondents may further wish to comment on questions 3 – 6 and 10 – 12, which are set out in section 9 of this paper and which are also relevant to lifetime mortgages.

31. The Panel notes that it is particularly difficult to frame a common illustration for these schemes, as there are so many different types, which often are not directly comparable. The emphasis may need to be on risk disclosure as well as cost comparability.

32. There is much to welcome in the proposed illustration, in particular, the clear coverage of cost and risk. Although the FSA has no jurisdiction over reversion companies, it should examine how this might also be adapted for use by them, which would be welcome.

33. There is one major drawback. The Panel has serious concerns about treating the illustration as a stand-alone document, completely separate from documents for any related investment. The Panel believes that this separation raises the following problems:

- Although freestanding mortgages are increasingly common, some of the major providers still operate schemes where the mortgage and the investment are inextricably linked. For example, there are still many schemes where the interest is paid out of an annuity. In these cases, it is unacceptable for a consumer to have to search across two documents to find the key information - their net monthly income. Advisers may be encouraged to produce 'back of the envelope' calculations, which might lead to errors.
- The home income plan mis-selling problems of the 1980s usually arose because the mortgage and the investment were linked together in a way which did not meet the consumer's needs (i.e. an investment product not

producing enough to repay the interest). The proposed approach would not make such design problems any easier to spot.

34. The Panel considers that there is a possible alternative, which might introduce some benefits without requiring wholesale integration. The Panel believes that the 'Risks' section should be moved up, so that it is placed before 'Benefits'. A 'Net monthly income' section should then be inserted below 'Breakdown of mortgage payments'. Where only part of the cost comes in the form of interest, and part in a share in property appreciation, a note of this would be necessary. As paying interest out of the benefits is an alternative to rolling up interest, section 6b would not apply. The Panel believes that these proposed alterations would not lengthen the document.

35. Other comments relating to the pre-application illustration:

- It could benefit from further pruning and testing of the detail. For example, statements such as 'This is valid at the time of issue' do not add very much while increasing the length. Similarly, the projection of rolled-up interest may have a greater impact if it gave figures for each 3-year period, rather than for each year.
- The sourcebook gives examples of wording which would be acceptable. Given the great variety of schemes available, the FSA should encourage providers to give descriptions that are the best for each individual scheme. In the short term, at least, the Panel hopes that the FSA will encourage providers to seek pre-approval of their documentation, either from FSA or by Plain English accreditation, rather than relying solely on identikit descriptions.
- The risks section should cover risks arising from the effect of inflation on income-producing schemes, and any disadvantages to people who move house. It should also specifically state whether or not it is possible for negative equity to arise.

- Section 6a (breakdown of mortgage payments) presumably relates only to recurring costs. These fees need to be differentiated from those in section 8.
- It is not clear from the design of the form where the consequences of a move to another property would be handled - would this be covered in section 9?
- There is no attempt to quantify the cost of lost property value in a shared appreciation mortgage. The Panel can see no reason why a notional APR for the loss of value could not be calculated, on a number of assumptions, to allow comparison. Please see the Panel's response to question 18 on consumer education below.
- The benefits section should be clear on whether any benefits payable are quoted net or gross of any tax due.

Do respondents agree with this approach to the calculation of the estimated term for lifetime mortgages?

36. The FSA has proposed a term of 15 years for financial promotions and the customer's own life expectancy for illustrations. Both of these seem reasonable to the Panel. However, the Panel believes that where an impaired life annuity is offered, this should be made very clear in the documents.

Q18: What are respondents' views on a requirement to issue consumer education material to lifetime mortgage customers? At what stage should it be issued?

37. As equity release schemes do vary considerably, and there is little public awareness of them, the Panel believes that it would be extremely useful for potential purchasers to know at an early stage what types of scheme are available and who offers them. The Panel believes lenders should be required to provide independently produced information leaflets, providing

that these are specific enough to be of real value and complement other information available elsewhere.

38. In addition the Panel hopes that the FSA will explore other methods of consumer education - such as, supporting agencies which give free, impartial information and advice about such schemes to older people, including detailed comparisons of the cost of various schemes. There are very few independent advisers with appropriate expertise. In the USA, a number of such agencies are available, such as the Home Equity Information Centre run by the American Association of Retired Persons (<http://www.aarp.org/revmort/home.html>). This website includes technical specifications for detailed financial comparisons of various schemes (see comments above relating to the cost of Shared Appreciation Mortgages).

Q19: Do respondents consider that the FSA should introduce a degree of product regulation (effectively a 'no negative equity rule') in the case of lifetime mortgages?

39. The Panel agrees with the proposal to introduce a 'no negative equity rule'. Such a rule is far less likely to deter new entrants than another bout of mis-selling. New product design is extremely important in this market, as a wide range of products are needed to suit the varying needs of consumers. However, there is the potential for new schemes to arise with other design defects. The FSA should be prepared to monitor new products in this market (perhaps with the help of an expert agency, see Q18 above) and deal with such design problems early on.

40. The Panel notes that there has been some discussion of CAT marks for equity release schemes. The Panel does not believe that CAT marks would work in this market because of the very differing nature of the schemes. Any CAT mark standard would be either too high-level to be useful or would constrain new product development. In the Panel's view, a lifetime mortgage is either fit for its purpose, or not; and those which are not should not be permitted onto the marketplace.

APR

Q21: On the assumption that the FSA will, over time, make some changes to the existing APR methodology in the CCA Regulations, there are two possible drafting approaches that the rules could adopt:

(a) The FSA rules simply replicating the relevant consolidated CCA requirements, with minor drafting changes to aid intelligibility and for consistency with FSMA terminology. This is the approach presently adopted in the rules; or

(b) a rewriting of the CCA requirements in plain language. This may be difficult to achieve and runs the risk of distinctions being perceived between the CCA and FSMA approach even when none are intended.

What is the preferred approach of respondents?

41. The Panel supports the adoption of approach b, a rewriting of the CCA requirements in plain language. The Panel believes that there should be a thorough review of the APR methodology and are aware that the European Commission have just started consulting all member states on a revised consumer credit directive, which covers APR and poses similar questions to the comments made by respondents to the FSA Consultation Paper 70: Mortgage Regulation: The FSA's high level approach.

42. The OFT should consider in its review of the CCA the need for regulated agreements to be written in plain language, and as such for any future legislation to enshrine this principle.

43. This is a very complicated and technical section with no worked examples. As a result it is very difficult to relate the contents to reality.

Responsible lending

Q22: what are the respondents' views on the draft rules at MORT 9?

44. The Panel regards the draft rules in MORT 9 as an extremely important form of consumer protection for lifetime mortgagors. In the past, problems have occurred due to some advisers having agreed lines of credit with lenders, then advised their clients to draw down funds to buy unsuitable investments which would never have repaid the loan. The IFA's then went out of business and the mortgage lenders and investment providers denied any responsibility -resulting in the clients being unable to obtain any redress. The 'responsible lending' rule proposed by FSA would be extremely valuable in such cases.

45. The Panel notes that there is some confusion about how self certificated mortgages will fit in with the rules on ability to repay the mortgage; the Office of Fair Trading non status lending guidelines are relevant but not mentioned specifically in the rules/guidance being proposed by the FSA.

Charges

Q23: What are the respondents' views on the introduction of a rule that would require early repayment charges to be calculated as a reasonable pre-estimate of cost?

46. The Panel supports the proposal to introduce a rule that would require early repayment charges to be calculated as a reasonable pre-estimate of costs.

Q24: What are the respondents' views on the proposed requirements that all lenders express early repayment charges as cash amounts in the pre-application and offer stage disclosure documents?

47. The Panel agrees that all lenders should express early repayment charges as cash amounts in the pre-application and offer stage disclosure documents.

Q25: Do respondents agree with the FSA's proposed approach on arrears charges?

48. The Panel welcomes the proposals for a rule requiring lenders to limit arrears charges to a reasonable estimate of the cost of the additional administration required (i.e. no penalty charge being allowed).

Q26: Do respondents agree that such a rule is necessary?

49. The Panel agrees that a rule preventing exorbitant credit is necessary and fully supports its inclusion.

Cooling off

Q27: (a) What are respondents' views on the proposed cooling off period? Is it desirable to separate simple remortgages and if so how could this be achieved?

50. The Panel welcomes the proposed cooling off period of 7 days. In the case of simple remortgages if a borrower switches to a new lender the cooling off period should apply.

Arrears and repossessions

Q28: Do respondents agree with the proposed arrangements for disclosure when a customer is in arrears?

Q29: Do respondents believe that there is merit in requiring customers in arrears to be provided with a FSA information leaflet?

Q30: Do respondents support the proposed consolidation of existing good practice into the rules on the fair treatment of customers in payment difficulties?

51. The Panel supports the proposals made in the consultation paper. However, the Panel is concerned at the general use of the term 'reasonable', which is difficult to define and easy to comply with. The Panel believes that the rules should be more prescriptive. The Panel notes that the FSA has made use of safe harbour provisions in other services that it regulates. The Panel suggests that similar safe harbour provisions would assist both consumers and the industry.

52. The Panel suggests that consideration should be given to amending draft rule 12.3.2(1) (b) to include agencies that may charge a fee - for example, insolvency specialists, solicitors or other professionals. In addition the rule should be amended to include Independent Advice Centres with the Citizens' Advice Bureau and the Consumer Credit Counselling Service as a third party source of advice.

53. The Panel requests that rule 12.3.4 should provide guidance on the principle established in *Cheltenham and Gloucester Building Society v Norgan* [1996] 1 All ER 449. The Panel firmly believes that the FSA should monitor compliance with the principle established in this case.

54. The Panel is disappointed that the rules contain no mention of the lender allowing the borrower time to sell the property rather than allowing the property to be sold as a vacant repossession. The Panel notes that a

house will almost always fetch a lower price if it is sold as a vacant repossession.

Record keeping

Q31: Any comments on the FSA's proposals for record keeping

55. The draft rules require records of various documents to be kept for a 12-month period after the document was in use by a firm. It says the cost of maintaining records for longer is one reason for limiting the requirement to 12 months but the FSA 'fully expects that firms will need to keep records for longer periods to deal with customer complaints and the possibility of legal action being taken against the firm by a customer.'
56. The Panel believes that full records should be retained for the duration of a mortgage. The Panel notes that inadequate record keeping by firms has been a huge problem in the past when trying to investigate investment complaints and scandals. The Panel do not wish to see this familiar barrier occur with mortgages in the future. The costs of record keeping have been brought down by the use of electronic technology.
57. The Panel is aware that too often there are problems with the back office administration of mortgages, resulting in consumer detriment. The retention of records will enable consumer complaints to be fully investigated.

58. Who is on the Panel?

Colin Brown (Chairman)

Colin is an independent consultant specialising in consumer affairs. Previously Deputy Director of Research at Consumers' Association and Senior Fellow at the Policy Studies Institute, he has over 20 years' experience of social and consumer research.

Ann Foster (Vice-Chairman)

Ann is a former Director of the Scottish Consumer Council and has over twenty years' experience in the consumer movement. She is also a member of the Consumer Council for Postal Services. She was formerly Director of Government Affairs with Monsanto.

Jean Gaffin

Jean chaired OFTEL's Advisory Committee on Telecommunications for Disabled and Elderly People until 31 December 1999 and is currently a Non-Executive Director of Harrow & Hillingdon Healthcare NHS Trust. She has extensive experience of working on behalf of vulnerable consumers. Previous posts include: the Executive Director of the National Council for Hospice and Palliative Care Services and Chief Executive of Arthritis Care.

Yvonne Gallacher

Yvonne is Chief Executive of Money Advice Scotland, set up in 1989 by Scottish Consumer Council. She has over thirteen years' experience of consumer credit/money advice issues and of working with vulnerable consumers in a variety of roles, including debt counsellor, trainer and manager. She has also lectured and co-authored a Guide to Money Advice in Scotland. Yvonne is presently a member of the FSA Consumer Education Forum and Credit Union Consultation Panel. Yvonne is a member of the Scottish Consumer Council.

Harriet Hall

Harriet is a solicitor with considerable experience of consumer policy and retail financial services. She is a former legal officer with the National Consumer Council, where she worked on the needs of low income consumers, banking, credit, mortgages, regulation of equity release and long-term care insurance, the Financial Services and Markets Bill and the proposed EU directive on distance selling of financial services.

Dianne Hayter

Dianne is the Chief Executive of a new cancer charity, the Pelican Centre. She is the former Director of Corporate Affairs for the Wellcome Trust and was previously the Chief Executive of the European Parliamentary Labour Party and, prior to that, Director of Alcohol Concern. She has substantial voluntary sector and trade union experience.

John Howard

John is a solicitor with extensive experience of consumer issues as a former presenter of the daily consumer programme on Radio 4 'You and Yours'. He is currently a freelance broadcaster and his work includes presenting personal finance television programmes. He is a member of the Mortgage Code Compliance Board.

Vinod Kumar

Vinod is a social scientist with market research skills and extensive voluntary and public sector experience of policy analysis and research. Now retired, Vinod has previously worked for the Commission for Racial Equality and was Head of Policy and Research at the Royal National Institute for Deaf People. He is currently Non-Executive Director of Barnet Health Authority, board member of the South Barnet Primary Care Group and member of the Consumer Liaison Group of the Medical Research Council.

Nick Pearson

Nick is the National Money Advice Co-ordinator for the Federation of Information and Advice Centres. A career spent in advice organisations including the National Association of Citizens Advice Bureaux where he was manager of the Money Advice Support Unit, he has particular experience of credit, debt and personal finance issues and of working with vulnerable consumers.

Paul Salvidge

Paul is a former senior civil servant with experience of regulatory work, employment law, competition, consumer protection, telecommunications, financial services and company law. He was previously Competition Policy and Consumer Affairs Director at the Department of Trade and Industry.

Richard Smethurst

Richard is Provost of Worcester College, Oxford University; previously a non-executive Director of IMRO, he chaired their Training Standards Panel. He has served as an economic adviser in Whitehall, and on the Monopolies and Mergers Commission, where he was Deputy Chairman. Richard lectures widely on financial and economic topics to businessmen and adult education groups. He is President of the National Institute of Adult Continuing Education.

Jane Vass

Jane is an independent consumer researcher specialising in financial services. She was previously Head of the Financial and Economic Research Group at Consumers' Association and is still author and editor of a number of Consumers' Association publications. Other research has included work for the National Consumer Council. Her current committee memberships include: Council of the Ombudsman for Estate Agents, the Inland Revenue Tax Law Rewrite Project Consultative Committee and the FSA Training Advisory Panel.

Dave Watts

Dave is a partner in a media business which is involved in publishing, editing and journalism - personal finance plays a large part in this. He is a former editor of Which? and Money Which? and former Assistant Director of Consumers' Association. He was also a policyholder representative on the Insurance Brokers Registration Council for nine years.

How to contact the Panel

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