



Institute of Credit Management

**Institute of Credit Management**

The Water Mill, Station Road  
South Luffenham, Leicestershire  
LE15 8NB, United Kingdom

T +44 (0)1780 722900

F +44 (0)1780 721333

E [info@icm.org.uk](mailto:info@icm.org.uk)

19 December 2012

Rajnish Mathur  
Credit Policy Team  
Office of Fair Trading  
Fleetbank House  
2-6 Salisbury Square  
London  
EC4Y 8JX

Email [rajnish.mathur@oft.gsi.gov.uk](mailto:rajnish.mathur@oft.gsi.gov.uk)

Dear Mr Mathur

**RESPONSE OF THE INSTITUTE OF CREDIT MANAGEMENT TO:  
The OFFICE OF FAIR TRADING CONSULTATION – POWER TO SUSPEND CONSUMER CREDIT  
LICENCES – DRAFT OFT GUIDANCE FOR LICENCE HOLDERS**

The Institute of Credit Management is the largest professional credit management organisation in Europe. Its members hold important, credit-related appointments throughout industry and commerce, and we feel it appropriate to comment on this consultation.

In response to the specific questions:

**Q1. Do you have any comments about the structure and format of the guidance document?**

No.

**Q2. Is the guidance clear on the circumstances in which the power to suspend may be employed?**

Yes.

**Q3. Are there any substantive aspects with which you disagree?**

No.

**Q4. Are the case studies and the rationale for the decisions clear?**

Yes.

**Q5. Do you consider that there are any significant omissions particularly in respect of the circumstances in which you would expect to see OFT suspend with immediate effect?**

No.

**Q6. Is the decision-making model clear?**

Yes.

**Q7. Do you have any concerns about the process for decision-making, including representations?**

No.

**Q8. Is the guidance clear on representations and appeals mechanisms?**

Yes.

**Q9. What is your opinion on the time it will take for decisions to be made once representations have been made?**

We believe the proposed timescales to be reasonable.

**Q10. An alternative to issuing a detailed record of the adjudicator's reconsideration of the decision within two weeks of representations, is the option of a short (skeleton) record provided in a quicker timeline. What would be your thoughts/preferences on this as an option?**

Our preference would be for a short (skeleton) record to be provided in a quicker timeline followed by the detailed record of the decision to be issued within two weeks of representations.

**Q11. Are there any substantive aspects with which you disagree?**

No.

**Q12. Do you consider that there are any significant omissions?**

No.

Should you have any queries, please do not hesitate to contact me.

Yours faithfully

**Glen Bullivant**  
**Chair of Technical Committee**  
E-mail [governance@icm.org.uk](mailto:governance@icm.org.uk)