

To: The Strategy Manager

Although we are in agreement with most of the consultation questions please find detailed below our responses to those which we have an opinion:

Time Periods

Section 9.3

Six years is more than reasonable and we do not see the reason to extend to 10 years given that it is incumbent upon the advisor to revisit these contracts at least once a year to ensure it remains 'on track' for the clients target investment objectives. It is a moot point but I find it highly unlikely that you will find many, if any, of these traditional savings contracts being arranged for clients these days.

Extending the period would only give rise to the opportunity for clients to possibly complain about investment performance which has been stated in the Consultation document as not of concern to the Scheme.

Section 9.4

A 3 month time limit is sufficient

Section 10.1

Valid start date, although we are not sure why it should be backdated

Section 15.2.2

This depends on the cost but a lower annual levy would be welcome particularly by those not receiving continual complainants

Section 15.2.3

Yes this is fair, although it would be dependent on the level of funding required to ensure a fair annual levy

Section 15.2.8

There is not enough detail as to why this would be graded or not in the consultation paper to properly provide a view, potentially this is agreeable with more information as to the reason of grading

Section 15.2.9

Again this depends on the reason for grading there are unregulated businesses which may have considerably more complaints and larger profit such as loan companies which dependent upon the outcome of grading maybe unfair on regulated entities who subscribe to standards, codes of practice and regulation?

Fees/levies In general

To charge a fee regardless of the outcome is unfair to the industry as a whole, however even more so in relation to medium sized and regulated companies the cost could be outrageous, particularly as we are also required to remain within ANLA solvency guidelines. If a client is dissatisfied with the findings or final resolution from the service provider and then approaches the Ombudsman for redress this should not pass a financial burden on to the business in question, only if the findings are in favour of the client.

Although in principle we wholeheartedly support the role of the Ombudsman Scheme we would ask that the method of fee taking is considered in more detail before implementation.

Yours sincerely

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