

Dear sir,

After reading the consultation paper my comments are as follows :-

(section 7.2) – I have no comment.

(section 7.4) – this seems sensible.

(section 7.5) – this seems sensible.

(section 9.4) – this seems sensible.

(section 10.1) – I think this is dangerous and could encourage frivolous or vexatious complaints, I do not agree with a retroactive date such as this and think it is only equitable on the service providers to be bound by any decisions only from the date of incorporation of the ombudsman.

(section 15.2.2) - annual levies seems most equitable (but see 15.2.9 below)

(section 15.2.3) – seems pointless.

(section 15.2.8) – no.

(section 15.2.8) – I think graded fees should apply to all sectors. Why differentiate ?

(section 15.2.9) - if opting for a graded fee approach I think it is crucial that you take into account the amount of “relevant business” done with consumers within the areas of banking and insurance. ie, some insurance intermediaries will concentrate more on pure private individuals (eg, motor, household, yacht and travel insurance) which would in theory expose themselves to more complaints than those who concentrate more on providing insurance services to the corporate sector.

Richard Packman
Managing Director
Heritage Insurance Limited
La Chasse Chambers, La Chasse, St Helier, Jersey. JE2 4UE

Tel: +44 (0)1534 706503 - Direct +44 (0)1534 758875 - Switchboard