

Thank you for this information and the consultation paper.

I have a number of comments on the proposed Revised SFS, based on some years researching this area.

1. The revision of the SFS is to be welcomed and the inclusion of the ISI reasonable living expenses guidelines is a major step forward.
2. The Central Bank and some of the lending institutions are public sector bodies, and as such, are obliged to apply the public sector duty, as set out in legislation in 2014. This duty includes an obligation to promote equality and other legislation. Since the proposed SFS will be used not just to deal with arrears, but also as a means of record keeping by the lenders and the Central Bank, it is essential that the form is in line with the public sector obligations.
3. Different groups of borrowers can sometimes be treated in discriminatory ways. This has been a feature of mortgage lending in many countries, and thus it is necessary to properly monitor the situation to ensure it is not taking place in Ireland. Single parent (female) households are particularly affected by the actions of lenders in these cases, as are households with disabled children. Neither of the situations would be picked up by the SFS details required on the proposed form. Equally, ethnic minority status is an important issue with Ireland now home to people from many countries, and again the experience globally is for immigrants to be badly treated in mortgage arrears cases. Yet, the SFS does not pick up this.
4. In order for the Central Bank to comply with the public sector duty, I propose that the SFS be amended to include question on households type - with a number of options – those used by the CSO in the Census is one option.
5. Secondly, the SFS form needs to be revised to include details of any disability and the type of disability among the borrowers, their children or dependents. Medical and care needs are not the same as disability needs in many cases. This information will assist those lenders also who are public sector bodies to meet their obligations, but in any case it would be a major breach of the public sector duty were the Central Bank to exclude this from the proposed SFS.
6. Thirdly, the categories of people which Equal Status Act protects from discrimination in the supply of goods or services in the public and private sector must be included in the SFS, in order for the Central Bank to properly comply with the data requirements of its public sector duty. The Irish Human Rights and Equality Commission can supply the text to be included to address this.

Please contact me at the above address of you need any further information.

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