

**Submission from Bandon Credit Union Ltd:**

**To whom it may concern.**

29<sup>th</sup> January 2009

We have made a submission previously on the Voluntary Consumer Protection Code for Credit Unions, which now appears to be called the Savings & Loan our Voluntary Standards.

Without going into the nitty gritty of this whole code the definitions appear to still remain as they were originally, in that Saturday is still excluded as being a business day for Credit Unions, whereby many Credit Unions are open for business and operate on Saturday. As the protector of the consumer it's amazing how this point has even been missed.

Our main concern at all times has been that in society people are all at different social levels and their needs differ. Our main concern is that the vulnerable and the needy are helped and that we as a Credit Union can provide an on-going service to them without impediment or over regulation. If the director for Consumer Protection feels that there are Credit Unions who have infringed on their members rights we would suggest that they be dealt with on an individual basis. Credit Unions like ourselves who are providing an on-going professional service to our members and treating them with the dignity and respect that is their right should not be handcuffed or restricted in the performance of this valuable service, by over regulation.

While we appreciate that Regulation in itself is necessary, over regulation can make an institution treat its members as second class citizens and may remove or damage any bit of pride or dignity that they have in themselves.

We would suggest that in introducing a one size fits all standard, that this may not necessarily separate the wheat from the chaff but may destroy the valuable service that we have given to our members down through the years and that we who deal with our members face to face on a daily basis and are well aware of their difficulties and I'm sure that you as the Director of Consumer Protection would not want to drive them to individuals who will have no scruples but will abuse them by way of exorbitant interest rates and will not take the concerns of the individual into consideration.

As already intimated if a Credit Union has stepped out of line in dealing with their members we would ask that you deal with them directly and not to tar us all with the one brush, as regulation if it works is great but over regulation can cause a huge detrimental effect to the business. Our standards as far as we are concerned meet the needs of our members and your suggested standards will bring about more constraints and cause more hardship and poverty to the members of society that we are trying to help.

Initially Credit Unions were set up to help the under privileged and the down trodden in our society, if by over regulation you remove us from helping people at this level as a Director of Consumer Protection, we feel you would not be protecting the consumer but you would create a vacuum for the people that we help to be financially abused by others.

We ask that this standard in its present format not be implemented in the interest of the public good.

We are available to discuss the matter with you at any time.

Yours Sincerely,

Ray O'Mahony  
Chairperson on behalf of Bandon Credit Union Ltd