



**PIBA's Submission
on
Consultation Paper CP93
Central Credit Register**

APRIL 2015

About PIBA

The Professional Insurance Brokers Association (PIBA) is a representative body of Mortgage, Financial and Insurance Brokers. With over 860 member firms PIBA is the largest representative body for brokers in Ireland.

As many of our members are also mortgage intermediaries, the new Register will affect many clients of PIBA members. It is extremely important that the credit information contained on the new register is therefore accurate and can be challenged and amended when the data is not accurate.

Our response to the consultation is of a general nature and focuses on who will have access to the information contained within the register and what way the data will be used by the Central Bank to carry out their prudential supervisory function.

Access to the Information

In the process of applying for an application a credit intermediary assesses a client's application referencing available lenders credit criteria. If a client meets a lenders criteria and it is agreed with the client that this is the most suitable lender for them, an application is then made to this lender. At the time the application is made a client fills in a client declaration to allow the lender to check the consumer's credit history with the Irish Credit Bureau (ICB).

Mortgage Intermediaries are the first point of contact for many consumers when seeking a mortgage. Mortgage Intermediaries give consumers valued advice on which lender is most suitable for their personal circumstances – they do this by gathering information on the consumer via the Factfind and which is supported by documentation such as bank statements, payslips, P60's etc.

Currently the Mortgage Intermediary cannot check the consumer's credit history even with written consent from the consumer. The consumer must request the information themselves and then pass it onto the Mortgage Intermediary.

We believe that the Mortgage Intermediary, where they receive written consent from the consumer, should be allowed access the consumer's credit history on the new Central Credit Register (CCR).

Giving Mortgage Intermediaries access to this information on behalf of the consumer would allow them to more accurately assess the mortgage application and make recommendations accordingly.

Use of data by the Central Bank to carry out their prudential supervisory function

In the Consultation Paper (CP93) it notes that the Central Bank will use the information stored on the CCR to assist with its exiting functions such as prudential supervision.

PIBA are concerned about how this information will be used to assist the Central Bank in their prudential supervisory function and whether or not there would be a conflict of interest between the Central Bank maintaining this register and using it for its other functions. We believe that a full outline of how the data will be used should be published within to the industry to ensure transparency.

If the Central Bank intends using the credit information in respect of the fitness and probity regime the Industry should have full insight to any new credit rating system, how a rating is viewed and what presumptions will be made.

In the past for the purpose of fitness and probity the impact of an individual's credit history was assessed on a case by case basis, if this were to change then a full consultation with the industry on the new requirements should take place prior to the CCR been used for this purpose.

Accurate Data and Requests for amendments

Consumers whose data is stored on the new CCR should be allowed to challenge the accuracy of such data and request that such data be amended.

A request for an amendments process should be devised that allows consumers to easily query the data contained on the CCR through the Central Bank with the Credit Information Providers.

The consumer's data should not be viewable on the CCR until the request for amendment has been resolved.