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Claims Management Regulation – HQ Office  
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Consultation Co-ordinator  
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### **Claims Management Regulation – Regulation fees paid by claims management companies**

Barclays welcomes the opportunity to comment on the proposed regulation fee levels for CMCs in 2015 and 2016 and broadly agrees with the proposals made in the consultation which began on 20 November 2014.

We are pleased to note the confirmed migration of consumer complaint handling from the MOJ to the Legal Ombudsman in 2015, which will have a positive impact on the MOJ's resources. However, we have a general concern related to the full agenda of enforcement and compliance programmes that the MOJ needs to undertake and that you have sufficient resource to execute this effectively. Barclays remains committed to supporting both the MOJ and the Legal Ombudsman to ensure customers achieve the best outcome when they chose to engage a third party representative.

We would welcome the opportunity to discuss this in more detail.

In relation to the specific responses set out in this consultation we have the following comments:

#### **Paying for Regulation**

**1) Do you have any comments on the fee scales and the proposed draft Fees Determination for 2015-2016 (Annex A)**

Barclays is happy with the general approach outlined in Annex A - Draft Fees Determination 2015/16 and notes the detail around the pro rata calculations of amounts payable in relation to regulation, financial products and services uplift and adjustments where estimated figures are provided

**2) Do you have any comments on the proposal to increase the application fee from £1400 to £2000?**

Barclays are comfortable with this proposed increase on the basis it seems fair and an appropriate amount for each new CMC application and reflects the fact application fees have remained static since 2013/14. Please note that without detailed financial information we are comfortable to assume that the MOJ have modelled this increase to ensure it mitigates the anticipated contraction in the market.

**3) Do you have any comments on the proposal to increase the annual fee brackets of regulated businesses with an annual turnover of £88,889 or below £88, 889?**

Barclays agrees with this proposal

- 4) Do you have any comments in relation to the proposal to increase the percentages levied on annual turnovers of more than £88, 889?

Barclays agrees with this proposal

- 5) Do you have any comments in relation to the alternative options of (a) removing the caps on both the annual regulation fee and the financial products and services sector uplift or (b) retaining the fees caps but increasing them to £100,000?

Barclays recommends the Regulator considers Option A rather than Option B on the basis that It is the larger CMCs that drive the volume of consumer complaints and therefore where the increased focus on audit and compliance activity is required

- 6) Do you have any views on any potential equalities impacts (*race, sex, disability, sexual orientation, religion or belief, age, marriage, civil partnership, gender reassignment, pregnancy or maternity*) on individuals regarding the proposed fee determination? If so, please give reasons where possible to support your views

Barclays does not believe that there are any potential equalities impacts regarding the proposed fee determination

- 7) Bearing question 6 in mind, are there any particular forms of mitigation in relation to any potential equalities impacts that should be considered?

Barclays has nothing further to add

Should you require any further information please contact Rachael Eden ([Rachael.eden@barclaycard.co.uk](mailto:Rachael.eden@barclaycard.co.uk), 07725244451)

Yours sincerely,

Rachael Eden MBE  
Head of Barclays CMC Engagement and Strategy