

Financial Services Consumer Panel

AN INDEPENDENT VOICE FOR CONSUMERS OF FINANCIAL SERVICES

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Our ref: CP10/15* Chapter 8

Dear Emad

CP10/15* Quarterly Consultation 25: Chapter 8

The Panel shares the FSA's concerns about the inappropriate use of the Title Transfer Collateral Arrangements (TTCA) by some firms, which puts client assets at risk by removing them from the protection provided by the provisions of the Client Asset Sourcebook. We strongly support the proposal to limit the application of TTCA so that they cannot be used for retail clients. We also agree that the FSA should put new guidance in place to remind firms of their obligations to segregate client money in an appropriate and compliant way.

Yours sincerely

Adam Phillips
Chair
Financial Services Consumer Panel