

SECTION 14: FINANCIAL PRODUCTS

Question 44: Given CAP's policy consideration, do you agree that the underlined wording (Individual Voluntary Agreements) be included in the Background to CAP's rules on Financial products? If your answer is no, please explain why.

<i>Responses received in favour of CAP's proposal from:</i> Advertising Association; Asda; Charity Law Association; one individual; IPA; Which?; one organisation requesting confidentiality.	<i>Summaries of significant points:</i> No significant points raised.	<i>CAP's evaluation of those points and action points:</i> n/a
<i>Responses receive against CAP's proposal:</i>	<i>Summaries of significant points:</i> No significant points raised.	<i>CAP's evaluation of those points and action points:</i> n/a

Question 45:

- i) Taking into account CAP's policy consideration, do you agree that CAP's rules on financial products are necessary and easily understandable? If your answer is no, please explain why.
- ii) On consideration of the mapping document in Annex 2, can you identify any changes from the present to the proposed rules that are likely to amount to a significant change in advertising policy and practice, are not reflected here and that should be retained or otherwise be given dedicated consideration?
- iii) Do you have other comments on this section?

<p><i>Responses received from:</i></p> <p>Which?</p>	<p><i>Summaries of significant points:</i></p> <p>Which? calls for the Code to provide that marketing of credit must be ‘socially responsible’ and should ‘contain nothing that is likely to lead people to adopt styles of borrowing that are unwise’.</p>	<p><i>CAP’s evaluation of those points and action points:</i></p> <p>The general rule on social responsibility is sufficient to secure the objective. The ASA adjudication on Picture Loans indicates its stance on unwise styles of borrowing.</p> <p>CAP and the ASA have contributed to OFT work on “irresponsible lending” separately to ensure a joined up regulatory approach to consumer lending.</p>
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