



The Insolvency  
Service

# 2017 Annual Review of Insolvency Practitioner Regulation

Produced by: Insolvency Practitioner Regulation Section

Published May 2018

## Contents

1. Overview.....	1
2. Regulatory framework.....	3
2.1 Memorandum of Understanding (MoU).....	3
3. Regulatory Activities.....	5
3.1 Monitoring visits to the RPBs .....	5
3.2 Themed Reviews .....	5
3.3 Pre-pack administrations .....	8
3.4 Complaints Gateway .....	11
3.5 Complaints about RPBs.....	12
3.6 Complaints upheld against RPBs.....	12
3.7 Working with international delegates.....	12
4. Regulatory Developments.....	13
Annex 1: Regulatory and Disciplinary Statistics .....	14
Annex 2: Complaints Gateway update .....	27

# 1. Overview

---

This Review:

- summarises the regulatory activities of both the Insolvency Service and the Recognised Professional Bodies (RPBs) in 2017
- collates statistical information provided by the RPBs on authorisations, monitoring visits, complaints and disciplinary sanctions (see Annex 1)
- provides statistical information on the performance of the [Complaints Gateway](#) (see Annex 2)
- summarises monitoring activities and findings

## Overview

This 2017 Annual Review highlights a number of key work streams - including bonding arrangements for insolvency practitioners (IPs) – and the public consultation which we expect to publish, later this year.

In addition, we have updated and strengthened our guidance for the RPBs on how they should monitor volume IVA providers. The changes to the guidance, first introduced in 2007, take account of developments in the market place and our work observing a number of RPB monitoring visits and related outcomes. The refreshed guidance has been developed jointly by the Insolvency Service and a range of stakeholders, including key creditors groups and the RPBs.

The updated guidance has been strengthened, throughout, and key changes have included a definition of a volume provider, explaining how we think RPBs should carry out their monitoring work both in terms of frequency and process, a focus on safeguarding client monies, sampling a wider range of cases, monitoring the fairness and cost of the use of other products and services, monitoring debt advice and a greater acknowledgment of the different business model adopted by large IVA providers.

As part of our ongoing assessment of the effectiveness of the regulatory regime against the regulatory objectives, introduced in 2015, we will review how the RPBs implement this guidance. The publication of strengthened guidance is part of our wider project to assess the effectiveness of RPB monitoring work, which will be the subject of further reports to be published in the future.

Within this review we have also made reference to the work undertaken to encourage a profession which delivers services at 'a fair and reasonable cost', and considers the interests of all creditors in any particular case - following the introduction of the regulatory

objectives. Our work in this area continues and we do not currently anticipate publishing a separate report on our findings.

The annual statistics from the IP Complaints Gateway, demonstrate a downward trend in the total annual complaints received, and we are continuing to monitor this closely. In 2017 we received a total of 757 complaints, compared to 847 in 2016. Of the 757 received, this year, 41% were referred, 48% were rejected and 11% are currently on hold.

## 2. Regulatory framework

---

### Introduction

Regulatory oversight is undertaken by Insolvency Practitioner Regulation Section (IPRS), whose remit primarily involves:

- monitoring the regulatory activities of the RPBs to ensure that they are undertaken in accordance with common standards (as set out in the current Memorandum of Understanding, agreed with the Secretary of State);
- Developing regulatory policy and professional standards;
- Providing guidance to the insolvency profession on law and practice; and
- monitoring the effectiveness of the relevant legislation.

### Single Regulator Power

Much of IPRS' work, for the next year, will be around further evaluating the regulatory system and considering all evidence, which may help to inform an eventual decision on whether or not to exercise of the Single Regulator power, in due course.

The five RPBs are:

Institute of Chartered Accountants in England & Wales (ICAEW): [www.icaew.com](http://www.icaew.com)

Insolvency Practitioners Association (IPA): [www.insolvency-practitioners.org.uk](http://www.insolvency-practitioners.org.uk)

Association of Chartered Certified Accountants (ACCA): [www.accaglobal.com](http://www.accaglobal.com)

Institute of Chartered Accountants of Scotland (ICAS): [www.icas.com](http://www.icas.com)

Chartered Accountants Ireland (CAI): [www.charteredaccountants.ie](http://www.charteredaccountants.ie)

Since 1 January 2017 ACCA has delivered the majority of its insolvency regulatory functions through the collaboration agreement with the IPA, which consolidated the complaints-handling and monitoring arrangements of the two bodies. During 2017, ACCA retained responsibility for the initial licensing of insolvency practitioners.

### **2.1 Memorandum of Understanding (MoU)**

Historically, the relationship between the Secretary of State (SofS), as oversight regulator, and RPBs has been governed by a MoU which prescribes the terms of how the RPBs should regulate their insolvency practitioner licence holders.

The Small Business, Enterprise and Employment Act 2015 strengthened the regulatory framework by introducing statutory objectives on 1 October 2015, which RPBs must take account of when discharging their regulatory functions. The objectives provide an overall framework within which each of the RPBs should work.

Given the introduction of this legislation, the Insolvency Service has been discussing with RPBs whether we still need to retain the formal MoU. The current MoU is now out of date and its removal, which was discussed in last year's Annual Review, would allow RPBs more flexibility to carry out their functions to meet the regulatory objectives in a way that suits them, and is in keeping with the Government's deregulatory agenda to remove burdens.

The Insolvency Service have already published some overarching guidance, in December 2015, on how RPBs might go about meeting these objectives, and the Insolvency Service have been working with the RPBs to prepare some additional guidance which provides more detailed examples of the sort of behaviour that the Insolvency Service will be looking for when assessing whether or not a RPB is complying with the statutory requirements.

The Insolvency Service has made good progress on this, but due to the number of changes, to the initial draft, we will be circulating the guidance to the DfE and the RPBs, during April 2018, for comments and feedback.

In terms of next steps, once internal and Ministerial clearance is achieved, it is our intention to withdraw the MoU, after a 3 month transition period, and to publish the additional guidance.

The Insolvency Service anticipates that the updated guidance will come into effect during the course of 2018.

## 3. Regulatory Activities

---

This section summarises the Insolvency Service's monitoring work during 2017, including the outcomes from visits to the RPBs, other reviews, and the handling of complaints.

### 3.1 Monitoring visits to the RPBs

#### The ACCA

As at 1 January 2017, the ACCA had 108 licensed practitioners of which 102 were taking insolvency appointments. From the beginning of 2017, the ACCA has collaborated with the IPA to deliver the majority of its insolvency regulatory functions, other than the initial authorisation of insolvency practitioners.

A targeted monitoring visit to the ACCA authorisation team was carried out in February 2016 by the Insolvency Service and a report published in August 2016.

A further follow-up visit was carried out in February 2017 and this report outlines the progress made by ACCA against previous recommendations and also notes some other findings from the visit.

This latest report can be viewed [here](#).

### 3.2 Themed Reviews

In last year's Annual Review, the Insolvency Service made reference to a number of themed reviews, across all the RPBs, with the scope of assessing the effectiveness of the regulatory system. These reviews are on-going and findings and recommendations will be published in due course.

#### Bonding of insolvency practitioners

Following an initial review of statutory security arrangements for insolvency practitioners, a [call for evidence](#) was published, which closed in December 2016.

In April 2017 the Insolvency Service published the [summary of responses](#) to this call for evidence. The Insolvency Service received a total of 36 responses, from a cross-section of the insolvency profession and interested parties.

Of those who shared their views on possible legislative amendments, over 86% were in favour of changes to current legislation, and there was broad support from the 21 of 23

respondents, for the introduction of a form of Claims Management Protocol <sup>1</sup> between RPBs, bond providers and successor insolvency practitioners.

The project to consider changing the current arrangements for the bonding of IPs is ongoing, and a public consultation will be published, soon.

A number of legislative and non legislative changes are being proposed with the aim of providing higher return to creditors.

A voluntary Claims Management Industry Protocol is currently being developed for RPB review and feedback and possible publication, later this year, and bond wording is being scrutinised to identify where potential changes can be proposed. This will require us to give careful consideration as to how changes will impact both bond providers and their clients – whilst ensuring that bond wording regulations (Insolvency Practitioner Regulations 2005) continue to be adhered to, and commercial differentiation is maintained. This strand of the project is being considered as part of the wider bonding work stream and possible changes to the current bond wording Regulations.

In terms of next steps, IPRS are preparing a public consultation which we anticipate will be published later this year, subject to Ministerial agreement.

### Complaints handling

A review of the handling of complaints about insolvency practitioners by the RPBs was completed and a report [published](#) in September 2017, which made a number of recommendations.

This included recommending that the RPBs enter into discussions with the Insolvency Service to consider the feasibility of a mechanism whereby a form of redress to the complainant, by the insolvency practitioner, can be implemented - where the complainant has suffered inconvenience, loss or distress as a result of the IPs' actions.

Discussions with RPBs about compensation, commenced in February 2017 and the Insolvency Service have continued to work with RPBs to consider if a system of redress is something which is both viable and practicable.

This includes consideration of possible changes to the guidance paper issued by the Joint Insolvency Committee (JIC), to include appropriate references to redress as part of all IPs' complaints processes. In addition, the Insolvency Service plans to include additional information on the IP Complaints Gateway website, to ensure complainants are aware of this recent development, once agreement has been reached.

---

<sup>1</sup> The forthcoming public consultation will provide further information and allow respondents to comment, directly, upon all proposed measures and options, currently being considered.



## Monitoring and regulation of insolvency practitioners

Alongside our review into the monitoring of volume IVA providers, the Insolvency Service also carried out a wider review into the monitoring activities of the RPBs, including membership and regulatory functions of RPBs. This involved observing a number of on-site monitoring visits by the RPBs and consideration of regulatory outcomes.

The review also considered the process in place for publishing disciplinary sanctions and whether this could be strengthened. The findings and recommendations, following this review, will be discussed with the RPBs, in due course, with reports published later in the spring.

## Fees charged by insolvency practitioners

In 2016, a review commenced into the activities, and effectiveness, of the regulatory regime in monitoring fees charged by IPs. The review was commissioned following the introduction of the regulatory objective to encourage a profession which delivers services at 'a fair and reasonable cost' and consider the interests of all creditors in any particular case.

In 2017, the review obtained information directly from RPBs but due to staff changes within IPRS this information was not reviewed until late 2017. The historic RPB information has been reviewed in conjunction with information obtained from other sources. It is noted that the fee-approval process is different in Scotland, and more robust.

RPB responses indicate that they have provided guidance to members on fee matters and that through their regulatory monitoring; fee-related misconduct has been identified and reported for further consideration.

The review has also obtained, and analysed, information from the IP Complaints Gateway to establish the number of fee related complaints received via the Complaints portal.

Initial findings indicate that fee related matters are being reported to the IP Complaints Gateway and, where appropriate, being referred to RPBs.

Our work in this area will continue into 2018 and we will approach RPBs directly where necessary.

## Individual Voluntary Arrangements (IVAs)

Following concerns in the market place about the practices of volume IVA providers, the Insolvency Service carried out a themed review into how insolvency practitioners, at these firms, are regulated by the RPBs. This involved observing a number of onsite monitoring visits carried out by the RPBs, and holding a series of meetings between the RPBs and the main creditor representatives of banks who, typically, are the majority creditors in IVAs.

The review identified a number of significant concerns relating to how insolvency practitioners, at volume IVA providers, operate. Whilst, RPBs have demonstrated that they have been effective in identifying these concerns, in some cases the post-visit process lacks robustness and is failing to address these concerns in a prompt and efficient way.

The Insolvency Service is in the process of engaging with the RPBs over the draft recommendations, and expects to publish our report on the findings later in the spring. The Insolvency Service also issued updated [Guidance](#) to the RPBs on how they should go about their monitoring and regulatory activities concerning volume IVA providers.

## UK ELC

In 2017, the liquidation on public interest grounds of an employment law consultant acting as an intermediary for employees of insolvent companies resulted in IPRS reviewing the role of some IPs when accepting and submitting employee claims as office holder to the Redundancy Payments Service.

As part of our role and to strengthen public confidence in the regime, IPRS continue to engage and work with RPBs, reviewing the office holders' actions, before making and submitting a Statutory Declaration.

### **3.3 Pre-pack administrations**

#### Monitoring of SIP 16

Following the recommendations of the independent review by Teresa Graham into the economic impact of pre-pack administrations, a package of voluntary industry measures was introduced in November 2015, with the aim of improving the transparency of connected party pre-pack administration sales.

Since this date, RPBs have been responsible for monitoring insolvency practitioners' SIP 16 disclosures.

The Government has now begun a review to evaluate the impact of the voluntary measures in order to inform any future decisions on whether legislative measures are required to regulate connected party sales in administration.

As part of this review, the Government will look at the impact of the voluntary measures on both pre-pack sales and other connected party sales in administration.

We anticipate that the review will be completed by the autumn of this year.

A summary of the number of disclosures - each RPB received - during 2017, and the outcomes are shown below.

**Table 1: SIP 16 Monitoring by the RPBs (2017)**

RPB	SIP 16 statements received	SIP 16 statements reviewed	Compliant statements	Non-compliant statements	% Compliant <sup>2</sup>	Regulatory Action
ICAEW	219	51 <sup>3</sup>	30	21	59	0
IPA	115 <sup>4</sup>	114	67	47	59	1
ACCA	13	13	10	3 <sup>5</sup>	77	1
ICAS	10	9	9	1	100	0
CAI	0	0	0	0	-	0
<b>TOTAL</b>	<b>357</b>	<b>187</b>	<b>116</b>	<b>72</b>	<b>62</b>	<b>2</b>

Table 1 shows that from a total of 187 SIP 16 statements reviewed, 116 statements were viewed to be fully compliant with SIP 16, representing approximately 62% of the total.

Last year's Annual Review provided RPB analysis of pre-pack administrations, from 1/11/15 to 31/12/16. Since then, some RPBs, such as the ICAEW, have adopted their own risk-based approach to reviewing SIP 16 statements, focussing on those:

- submitted by IPs for the first time
- submitted by IPs who had not done so, for some time
- where previous reviews had indicated shortcomings.

#### Analysis of Pre-Pack administrations (2017)

There have been a total of **203 sales to connected parties**, and **23 referrals to the Pre-Pack Pool**.

The following breakdown, by RPB, is as follows:

**ACCA** – 7 (2 referrals)  
**IPA** – 63 (10 referrals)  
**ICAEW** – 133 (11 referrals)  
**ICAS**: 0  
**CAI**: 0

<sup>2</sup> % compliant - of SIP 16 Statements reviewed

<sup>3</sup> A further 34 reviews are currently in progress

<sup>4</sup> One disclosure has yet to be reviewed as was received in the latter part of December 2017.

<sup>5</sup> One SIP16 statement was reviewed during a monitoring visit in February 2017. The outcome was a complaint referral. In addition, the IPA's Membership and Authorisation (M&A) Committee ordered follow up action of a focussed monitoring visit to the IP.

## Pre-pack Pool

As part of the Government's commitment to evaluate the impact of the voluntary industry measures, introduced in November 2015, the evaluation will examine the impact of each of Teresa Graham's recommendations. Part of this evaluation will include closer scrutiny on the Pre-Pack pool. This will seek to answer the following questions:

- Has the Pool increased transparency and public confidence in connected party pre-pack administrations?
- What numbers of connected party purchasers have chosen not to approach the Pool and why?
- What is the success rate of the new company where purchasers approached the Pool between 1 January 2016 and 31 December 2016?

The Pre-Pack Pool's second annual report, covering the 12 months from January to December 2017, provides the following overview:

**Table 2: Referrals of pre-pack administrations, in 2017**

Pre-Pack administrations	
Positive outcomes	11
'Qualified' positives	8
Negative outcomes	4
Total applications	23

The Pool reviewers, having scrutinised the submissions (submitted online through a dedicated portal), can give one of three opinions:

1. The transaction is *not unreasonable to proceed* - (positive)
2. That it is not unreasonable but there are *minor limitations* in the evidence provided - (a "qualified positive").
3. The *case is not made* - (negative).

The majority of the Administrations referred, were managed by practitioners licensed by either the ICAEW or the IPA.

The Pre-Pack Pool Annual Report explains that insolvency statistics for 2017 show there were 1289 administrations in total, which compares to 1374 in 2016 - reflecting further reductions in Administrations, generally.

RPBs have reported during the period January to December 2017 that they saw 203 *connected party* Pre-Packs.

The report highlights that the figures remain below the perceived “peak” of Administrations, - with historical figures, such as 4808 in 2008, partly triggering concerns that led to revisions of SIP 16 - including the formation of the Pre-Pack Pool.

The second year of operation has seen a further reduction in referral rates (down 42%) on 2016.

The report highlights the concern that current data indicates that only 11.3% of all eligible Pre-Packs were referred and given the continuing decline in numbers of referrals, it may become more challenging for the Pool to meet its objective of reassuring creditors that pre-packs are “reasonable” and “fair”.

### 3.4 Complaints Gateway

In 2017, the Gateway received 757 complaints. Of these, 308 were referred to the RPBs and 363 were rejected; 86 complaints are on hold, whilst the Gateway seeks further information from the complainant.

**Table 3: IP Complaints Gateway data (2016 and 2017)**

	2016	2017
<b>Total complaints</b>	847	757
<b>Referred</b>	456	308
<b>Rejected</b>	247	363
<b>On hold</b>	144	86

The Insolvency Practitioner Regulation Section (IPRS) continues to work closely with our IP Complaints Gateway colleagues. As part of this collaboration, we maintain close communication through the exchange of information and data as well as organising regular, on site visits to the Leeds office to deliver bespoke training, tailored to meet individual and team needs.

Last year we highlighted how refinements to the initial assessment process resulted in an increase in the number of complaints being rejected, because specific complaints criteria had not been met.

From January to December 2017, 98 complaints were rejected because complaints were assessed as being about the *effect* of the insolvency procedure, and 36 complaints were rejected as they were not directly about an IP.

Annex 2 provides further information on the operation of the Gateway.

### 3.5 Complaints about RPBs

As oversight regulator we have a duty to investigate complaints about the RPBs. This primarily takes the form of an investigation to ascertain if the RPB, in question, has failed to follow its own procedure or to ensure current procedures are adequate and that they meet agreed standards. A complaint concerning a RPB, may also involve consideration of the handling of the original complaint - to verify that both the way it was conducted and the manner in which the decision was reached, was done fairly.

**Table 4: Complaints received about RPBs (2017)**

Authorising Body	Complaints received / carried forward	Upheld	Partially upheld	Rejected
ICAEW	7 <sup>6</sup>	0	1	2
ACCA	1	1	0	0
IPA	6 <sup>7</sup>	0	0	2
CAI	0	-	-	-
ICAS	1 <sup>8</sup>	0	0	0

### 3.6 Complaints upheld against RPBs

#### ACCA

One complaint against ACCA was upheld as it failed to consider some new and relevant evidence. In addition, it was found that not all of the complaint had been seen by the independent assessor. This approach was considered to be inconsistent with that of other RPBs.

#### ICAEW

One complaint has been partially upheld, due to our concerns over the complainant's ability to challenge the ICAEW decision on his complaint.

### 3.7 Working with international delegates

We have welcomed international delegates from both Poland and India. As part of this international collaboration, we have explained how our own Insolvency regime functions, and shared information to assist in their development of a regulatory system for their insolvency professionals.

We have received positive feedback and consider this continuing liaison, with international colleagues, an important part of our wider work and in the sharing of good practice

---

<sup>6</sup> Three cases are on-going and one referred to IP Complaints Gateway

<sup>7</sup> Four cases are on-going

<sup>8</sup> This case is on-going

## 4. Regulatory Developments

---

### 4.1 IVA Standing Committee (IVASC)

The IVA Standing Committee continues to meet three times per year, and the Insolvency Service continues to Chair these meetings. Last year, we mentioned the work of the IVASC which led to the publication of a revised [IVA protocol](#) which took effect from October 2016. Since then, the protocol has not been re-issued and the Committee anticipate that this is likely to be done later in 2018, once revisions to the document have been finalised.

IVASC meeting minutes continue to be [published online](#), so current work and proposed future actions can be accessed and viewed by all interested parties.

### 4.2 Joint Insolvency Committee (JIC)

The Joint Insolvency Committee (JIC) is a forum for the discussion of insolvency issues and standard setting. It has responsibility for the development and revision of Statements of Insolvency Practice (SIPs), the Insolvency Code of Ethics and Insolvency Guidance Papers (IGPs). JIC promotes consistency across the insolvency profession.

The committee is made up of representatives, from each of the five RPBs, and from the Insolvency Service and the Insolvency Service Northern Ireland. The committee also has five lay members.

During 2017, the JIC consulted on changes to the Insolvency Code of Ethics, following the first detailed review of the code since its introduction in 2009. Views were sought from insolvency practitioners and other interested parties.

Last year, the JIC consulted on changing some of the SIPs. This included SIP 11, relating to the handling of funds in formal insolvency appointments and SIP 6 (England and Wales) relating to deemed consent and decision procedures in insolvency proceedings.

As a result of these consultations, new versions of these SIPs were introduced and became effective from 1 January 2018. An updated version of SIP 15: reporting and providing information on their functions to committees and commissioners was introduced and became effective from 1 March 2017.

### 4.3 Code of Ethics

A consultation on revisions to the Code of Ethics closed on 25 July 2017. There were 22 responses to the consultation. A JIC working group is currently considering the responses to the consultation, and a revised version is expected to be issued later this year.

# Annex 1: Regulatory and Disciplinary Statistics

## Authorisations

**Table 5: Number of insolvency practitioner authorisations (2017- 2018)**

	ICAEW	IPA	ACCA	ICAS	CAI	Total
<b>IPs at 1 January 2017</b>	788	567	108	98	44	<b>1,605</b>
<b>Appointment takers</b>	610	472	102	77	41	<b>1,302</b>
<b>IPs at 1 January 2018</b>	783	557	94	93	43	<b>1,570</b>
<b>Appointment takers</b>	599 <sup>9</sup>	460	89	75	41	<b>1,264</b>

## Insolvency practitioner licences revoked

From January to December 2017, no IP licences were revoked by any of the RPBs.

## Monitoring

**Table 6: Number of RPB monitoring visits to insolvency practitioners**

	ICAEW	IPA	ACCA	ICAS	CAI
<b>Routine</b>	<b>121</b>	<b>167</b>	<b>21</b>	<b>25</b>	<b>23</b>
<b>Targeted</b>	<b>1</b>	<b>11</b>	<b>5</b>	<b>6</b>	<b>3</b>

<sup>9</sup> Including 3 restricted and 5 conditional



**Table 7: Outcomes following all monitoring visits to insolvency practitioners in 2017**

	ICAEW	IPA	ACCA <sup>10</sup>	ICAS	CAI
<b>Satisfactory</b>	<b>92</b>	<b>113</b>	<b>18</b>	<b>24</b>	<b>20</b>
<b>To be confirmed / decision not finalised</b>	<b>47</b>	<b>41<sup>11</sup></b>	<b>2<sup>12</sup></b>	<b>0</b>	<b>0</b>
<b>Further visit - not yet carried out</b>	<b>1</b>	<b>4</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Further visit carried out – no further action</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>3</b>	<b>2</b>
<b>Referral for investigation</b>	<b>4</b>	<b>5</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Licence withdrawn</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Licence restricted</b>	<b>2<sup>13</sup></b>	<b>2</b>	<b>1</b>	<b>0</b>	<b>1</b>
<b>Undertakings and confirmations</b>	<b>22</b>	<b>1</b>	<b>0</b>	<b>4</b>	<b>0</b>
<b>Regulatory penalty/referral for disciplinary consideration</b>	<b>1</b>	<b>7</b>	<b>1</b>	<b>0</b>	<b>0</b>
<b>Plans for Improvement</b>	<b>0</b>	<b>3</b>	<b>2</b>	<b>0</b>	<b>0</b>
<b>Compliance Review/Self Certification requested</b>	<b>23</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

<sup>10</sup> ACCA had two routine monitoring visits with unsatisfactory outcomes which are not captured within table, but relate to warnings issued to two IPs, for incorrectly drawing remuneration.

<sup>11</sup>

<sup>12</sup> RE: One targeted visit, the IPA's Membership and Authorisation (M&A) Committee has requested a copy of the report prepared by the compliance provider engaged by the IP

<sup>13</sup> Continued

**Table 8: Sanctions following complaints in 2017**

	ICAEW	IPA	ACCA	ICAS	CAI
<b>Warning or caution (not published)</b>	<b>2<sup>14</sup></b>	<b>17</b>	<b>2<sup>15</sup></b>	<b>0</b>	<b>0</b>
<b>Consent Order – reprimand and / or fine</b>	<b>6</b>	<b>22</b>	<b>11<sup>16</sup></b>	<b>1</b>	<b>0</b>
<b>Rest on file (not published)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Exclusion and Fine</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

**Table 9: Complaints remaining open over 12 months**

RPB	>2013	2013	2014	2015	2016
<b>ICAEW</b>	<b>0</b>	<b>2</b>	<b>2</b>	<b>6</b>	<b>0</b>
<b>IPA</b>	<b>2</b>	<b>5</b>	<b>2</b>	<b>5</b>	<b>12</b>
<b>ACCA</b>	<b>1</b>	<b>12</b>	<b>6</b>	<b>0</b>	<b>6</b>
<b>ICAS</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>CAI</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>3</b>

<sup>14</sup> Data relates to cases closed in 2017 – for both warnings/cautions and consent orders/reprimands.

<sup>15</sup> IPA managed

<sup>16</sup> One IP had two allegations found proven, but the case was closed with no sanction and no further action or costs. Therefore it is not included in this figure.

**Table 10: Summary of regulatory action and disciplinary sanctions issued (2017)**

RPB	IP	Sanction	Reason
IPA (for ACCA)	<IP's name removed>	Licence restriction order.  Referral to Investigations Committee	<p>This Order is made in relation to the M&amp;A decision to restrict &lt;IP's name removed&gt; insolvency licence pursuant to which he is: Prohibited from accepting any new appointments either jointly with another Licensed Insolvency Practitioner or in his sole name. This order takes effect from 2 October 2017.</p> <p>The Committee found that &lt;IP's name removed&gt;'s technical knowledge was not up to date. The M&amp;A was concerned that &lt;IP's name removed&gt; does not have sufficient knowledge of the Insolvency Rules. The Restriction will remain in place until &lt;IP's name removed&gt; satisfies the M&amp;A that his technical knowledge is up to the required standard for Licensed Insolvency Practitioners.</p>
IPA	<IP's name removed>	Licence restriction order.	<p>This Order is made in relation to the M&amp;A decision to restrict &lt;IP's name removed&gt;'s insolvency licence pursuant to which he is:</p> <p>prohibited from accepting any new appointments other than jointly with another licensed Insolvency Practitioner or where another licensed practitioner is already in office or is appointed concurrently;</p> <p>required to notify the IPA Secretariat of any practice(s) at which he is employed and confirm that he is satisfied with the way the practice conducts itself and that there are no signatories on case/bank mandates who are not insolvency officeholders.</p> <p>This order takes effect from 2 October 2017.</p> <p>The Committee found that &lt;IP's name removed&gt;'s systems were inadequate and as a result of which, significant sums of monies were incorrectly drawn from estates for which he was responsible. All funds drawn incorrectly were subsequently repaid to the relevant estates.</p>
IPA	<IP's name removed>	Disciplinary Consent Order. Severe Reprimand, costs of £4,050	<p>&lt;IP's name removed&gt;:  Failed to submit progress reports to the Registrar of Companies within the requisite timescale, in breach of Section 104A of the Insolvency Act 1986 and Rule 4.49C of the Insolvency Rules 1986.  Failed to respond to a letter from the liquidator of</p>

			<p>an unsecured creditor, within a reasonable timescale, in breach of the fundamental principle of professional behaviour of the Ethics Code.</p> <p>The Investigation Committee decided to impose a disciplinary order that &lt;IP's name removed&gt; receive a Severe Reprimand and pay the associated costs incurred by the IPA.</p>
IPA	<IP's name removed>	<p>Disciplinary Consent Order. Severe Reprimand Fine of £2500 and associated costs.</p>	<p>This Order is made in relation to a complaint that:</p> <p>&lt;IP's name removed&gt; breached Statement of Insolvency Practice 8 (SIP8) and the fundamental principles of Professional Competence &amp; Due Care and Professional Behaviour of the Insolvency Code of Ethics when he advised the Chairman of the S98 creditors' meeting to accept a proxy from HMRC which was received late, on the day of the meeting, in breach of paragraph 24 of SIP8.</p> <p>Accordingly, &lt;IP's name removed&gt; was found liable to disciplinary action under the IPA's Articles of Association.</p>
IPA	<IP's name removed>	<p>Disciplinary Consent Order. Severe Reprimand and payment of associated costs.</p>	<p>This Order is made in relation to a complaint that &lt;IP's name removed&gt; breached the fundamental principle of Professional Behaviour when she failed to ensure that correspondence from solicitors acting for a creditor, between 25 February 2015 and 16 September 2016 received a response.</p> <p>Accordingly, &lt;IP's name removed&gt; was found liable to disciplinary action under the IPA's Articles of Association.</p>
IPA	<IP's name removed>	<p>Disciplinary Consent Order. Severe Reprimand. Fine of £1,000 and associated costs.</p>	<p>This Order is made in relation to a complaint that &lt;IP's name removed&gt;, in her role as Supervisor of an IVA, breached the fundamental principle of Professional Competence and Due Care of the Insolvency Code of Ethics when she:</p> <ul style="list-style-type: none"> <li>a) failed to respond to correspondence from a creditor in a timely manner, and</li> <li>b) drew unauthorised remuneration of £300, unapproved expenses of £240 for the review and assessment of potential payment protection insurance (PPI) claims and a £27 monthly software support fee.</li> </ul> <p>Accordingly, &lt;IP's name removed&gt; was found liable to disciplinary action under the IPA's Articles of Association.</p> <p>The sanction imposed takes into account the fact that &lt;IP's name removed&gt; accepted the allegations and repaid the overdrawn amounts to the estate.</p>

IPA	<IP's name removed>	Consent Order - Severe Reprimand and fine of £1,000, plus costs.	IP issued a letter to the Complainant incorrectly describing herself as his insolvency practitioner, and inappropriately passed the Complainant's personal details to a third party, without his permission, in breach of the fundamental principle of confidentiality of the Ethics Code for Insolvency Practitioners.
IPA	<IP's name removed>	Disciplinary Consent Order. Severe reprimand. Fine of £10,000 and associated costs.	<p>This Order is made in relation to a complaint that:</p> <p>&lt;IP's name removed&gt; breached the fundamental principle of Professional Behaviour and Paragraph 65 of the Insolvency Code of Ethics in relation to the content of a website associated with his firm, which was found to be inappropriate.</p> <p>Accordingly, &lt;IP's name removed&gt; was found liable to disciplinary action under the IPA's Articles of Association.</p> <p>The Investigation Committee considered the matter to be very serious, and likely to bring the profession into disrepute by damaging the public's confidence in Insolvency Practitioners. The sanction imposed reflects the gravity of the issues identified, and the fact that the events relating to the complaint occurred following a previous finding by the Investigation Committee in 2012. Therefore, there was no justification for &lt;IP's name removed&gt;'s failure to review the material identified on the website.</p>
IPA	<IP's name removed>	Disciplinary Consent Order. Severe reprimand. Fine of £10,000 and associated costs.	<p>This Order is made in relation to a complaint that:</p> <p>&lt;IP's name removed&gt; breached the fundamental principle of Professional Behaviour and Paragraph 65 of the Insolvency Code of Ethics in relation to the content of a website associated with his firm, which was found to be inappropriate.</p> <p>Accordingly, &lt;IP's name removed&gt; was found liable to disciplinary action under the IPA's Articles of Association.</p> <p>The Investigation Committee considered the matter to be very serious, and likely to bring the profession into disrepute by damaging the public's confidence in Insolvency Practitioners. The sanction imposed reflects the gravity of the issues identified, and the fact that the events relating to the complaint occurred following a previous finding by the Investigation Committee in 2012. Therefore, there was no justification for &lt;IP's name removed&gt;'s failure to review the material identified on the website.</p>

IPA	<IP's name removed>	Disciplinary Consent Order. Severe reprimand and fine of £1,000 and associated costs.	<p>This Order is made in relation to a complaint that &lt;IP's name removed&gt; breached Statement of Insolvency Practice 3.3 ('SIP3.3') and/or the fundamental principle of professional competence and due care of the Ethics Code by:</p> <p>Failing to carry out six monthly and annual reviews of the debtor's financial circumstances.</p> <p>Failing to request tax returns in a timely manner and failing to carry out reviews of income from received documentation in a timely manner.</p> <p>Failing to adequately communicate with the debtor in respect of the progress of the PTD, reviews being carried out into income and any arrears that required payment.</p> <p>Reporting to creditors in the annual reports of 9 September 2014 and 8 September 2015 that regular reviews have been carried out and there were no changes required to contributions when review had not been carried out as required.</p>
IPA	<IP's name removed>	Disciplinary Consent Order. Reprimand and fine of £1,000 and associated costs.	<p>This Order is made in relation to a complaint that &lt;IP's name removed&gt;, in his role as Supervisor of an IVA breached the fundamental principle of Professional Competence and Due Care of the Insolvency Code of Ethics and Statement of Insolvency Practice 3 ('SIP3') when he:</p> <p>Failed to carry out a review of the Debtor's income, and expenditure in a timely manner (following receipt of the required information), and then failed to request increased contributions due from the Debtor.</p> <p>Failed to include the reduction of Disability Living Allowance in the Debtors' income after being advised that this amount had ceased to be paid 6 months earlier.</p> <p>Failed to progress breach notices that applied to the Debtor's IVA and failed to update creditors in three annual reports about the actions taken under the breach.</p> <p>Accordingly, &lt;IP's name removed&gt; was found liable to disciplinary action under the IPA's Articles of Association.</p>
IPA	<IP's name removed>	Disciplinary Consent Order. Reprimand and a fine of £1,000 and associated costs.	<p>This order was made in relation to a complaint that &lt;IP's name removed&gt; breached the fundamental principle of Professional Competence and Due Care and/or Professional Behaviour and/or Objectivity of the Ethics Code for Insolvency Practitioners because;</p> <p>He failed to issue the debtors with a formal notice of a meeting of creditors on 21 October 2013. b)</p>

			There was an administrative failure to log and record a proxy form, as a result of which a proxy that would have materially affected the outcome of the meeting of creditors was overlooked.
IPA	<IP's name removed>	Disciplinary Consent Order. Severe reprimand, a fine of £7,500 and associated costs.	<p>This Order is made in relation to a complaint that &lt;IP's name removed&gt;, in his role as Supervisor of a Partnership Voluntary Arrangement (PVA), breached the fundamental principle of Professional Competence and Due Care and Statement of Insolvency Practice 3 (SIP 3), by failing to:</p> <p>provide inaccurate advice regarding the suitability of a PVA to deal with partnership debts and personal tax liabilities, and</p> <p>carry out sufficient checks on the personal and partnership tax liabilities with HMRC to be able to properly consider whether the partners required interlocking IVA's were required for the partners as well as the PVA to ensure their personal pension contributions dealt with all liabilities.</p> <p>Accordingly, &lt;IP's name removed&gt; was found liable to disciplinary action under the IPA's Articles of Association.</p>
IPA	<IP's name removed>	Disciplinary Consent Order. Severe reprimand and a fine of £2,000 and costs.	<p>This Order is made in relation to a complaint that &lt;IP's name removed&gt; breached Statement of Insolvency Practice 3.3 (Scotland) in that he failed to assess whether a Trust Deed will have a reasonable prospect of becoming protected since contributions were payable by a third party subject to a Protected Trust Deed.</p> <p>The Investigation Committee noted that this was the second complaint it considered against &lt;IP's name removed&gt; of a similar nature;</p>
IPA	<IP's name removed>	Disciplinary Consent Order. Severe reprimand and a fine of £2,000 and costs.	<p>This Order is made in relation to a complaint, by a debtor, that &lt;IP's name removed&gt; in his role as Trustee of a Protected Trust Deed (PTD) breached Statement of Insolvency Practice 3.3 (Scotland) when he failed to:</p> <p>properly advise a debtor and</p> <p>assess whether a PTD was the appropriate solution the debtor, and</p> <p>enter into an enforceable written agreement with a third party for payment of contributions.</p> <p>And as a consequence contravened Regulation</p>

			<p>21(4) of the Protected Trust Deeds (Scotland) Regulations 2013 by failing to ensure that contributions from the debtor in a PTD did not include an amount derived from social security benefit.</p> <p>Accordingly, &lt;IP's name removed&gt; was found liable to disciplinary action under the IPA's Articles of Association.</p>
IPA	<IP's name removed>	Disciplinary Consent Order. Severe reprimand and fine of £2000 and costs.	This Order is made in relation to a complaint that whilst acting as an Administrator of a company <IP's name removed> breached the fundamental principle of Professional Competence and Due Care in a statement issued on 18 July 2016, when he failed to include the level of detail and disclosures required to comply with Statement of Insolvency Practice (SIP) 16.
IPA	<IP's name removed>	Disciplinary Consent Order. Reprimand and fine of £2000 and costs.	<p>This Order is made in relation to a complaint that, in his role as liquidator, &lt;IP's name removed&gt; failed to:</p> <p>adequately investigate the affairs of the company and</p> <p>investigate the conduct of a former director pursuant to the requirements of the Company Directors Disqualification Act 1986 and</p> <p>provide information requested in relation to the costs incurred in the liquidation within the time frame permitted by Regulation 36A of the Insolvency Regulations 1994 (as amended).</p>
IPA	<IP's name removed>	Disciplinary Consent Order. Reprimand and fine of £2,500 and to make a contribution towards costs.	<p>This Order is made in relation to a complaint that &lt;IP's name removed&gt;, in his role as Administrator of a company, breached Statement of Insolvency Practice ('SIP') 16 by failing to provide a statement as to whether</p> <p>1) the connected party had been made aware of their ability to approach the pre-pack pool and/or had approached the pre-pack pool and 2) whether a viability statement had been requested from the connected party but not provided.</p>
IPA	<IP's name removed>	Disciplinary Consent Order. Reprimand and fine of £1000 and costs.	This Order is made in relation to a complaint that whilst acting as Liquidator of a Company, <IP's name removed> breached the Ethics Code for Insolvency Practitioners by failing to convene two annual meetings of creditors and present progress reports to those meetings. The first meeting was not convened due to a staffing issue which was subsequently addressed. The second meeting was not convened due to the proximity of a further final meeting in the proceedings but it ought to have been convened.



IPA	<IP's name removed>	Disciplinary Consent Order. Severe reprimand, a fine of £5,000 and costs.	<p>This Order is made in relation to a complaint that &lt;IP's name removed&gt; breached the fundamental principle of Professional Competence and Due Care when he failed in accordance with Schedule 2 Part 2 of the Insolvency Practitioner Regulations 2005 (as amended):</p> <p>to ensure that there was a bond in force in respect of numerous insolvent estates over which he was appointed;</p> <p>to send the bordereaux returns referred to in 1) above to the IPA, and</p> <p>he failed to respond to correspondence from IPA and/or address the concerns raised in relations to the above.</p> <p>Accordingly, &lt;IP's name removed&gt; was found liable to disciplinary action under the IPA's Articles of Association.</p>
IPA	<IP's name removed>	Disciplinary Consent Order - Reprimand and a fine of £1,000 and costs.	<p>This Order is made in relation to a complaint from a debtor that &lt;IP's name removed&gt;, in his role as Supervisor of two linked Individual Voluntary Arrangements (IVAs), breached Statement of Insolvency Practice 3.1 when having been provided with the mortgage details, he failed to progress his administration and obtain a valuation of the debtors' property, as required, before all contributions had been paid under the agreement.</p>
IPA	<IP's name removed>	Disciplinary Consent Order. Reprimand and a fine of £500 and costs.	<p>This Order is made in relation to a complaint that whilst acting as Supervisor &lt;IP's name removed&gt; breached the fundamental principle of Professional Competence and Due Care in that she failed to remove a Land Registry Restriction against the Property following the completion of a debtor's IVA .</p>
IPA	<IP's name removed>	Disciplinary Consent Order. Reprimand and fine of £500, plus costs.	<p>This Order is made in relation to a complaint that &lt;IP's name removed&gt; breached the Fundamental Principle of Professional Competence and Due Care by failing to:</p> <p>administer the terms of the IVA regarding the debtor's interest in his property, in a timely manner, and</p> <p>appropriately communicate with the Debtor.</p> <p>Accordingly, &lt;IP's name removed&gt; was found liable to disciplinary action under the IPA's Articles of Association.</p>

IPA	<IP's name removed>	Disciplinary Consent Order. Reprimand and fine of £1000 and costs.	This Order is made in relation to a complaint from a debtor that <IP's name removed>, in his role as Supervisor of an IVA, breached the fundamental principle of Professional Competence and Due Care by making inaccurate statements in a report to the debtor's creditors and by excessive delay in dealing with the term of the IVA concerning the effect of a greater than 10% increase in creditors' claims.
ICAEW	<IP's name removed>	Investigation Committee order: Reprimand and a fine of £5,000 and costs.	Failed to comply with the fundamental principle of professional competence and due care set out in the Code of Ethics Part D, in that he incorrectly notified the Secretary of State that he had been appointed as supervisor of individual voluntary arrangements for Mrs X and her husband, when no arrangement had been proposed or approved for Mrs X
ICAEW	<IP's name removed>	Investigation Committee order: Reprimand and a fine of £2,500 and costs.	Between 19 April 2013 and 15 May 2015 <IP's name removed> as supervisor of the individual voluntary arrangements of Mr and Mrs X failed to issue a certificate of completion in a timely manner.
ICAEW	<IP's name removed>	Investigation Committee order. Reprimand and a fine of £2,650 and costs.	Failed to act in accordance with paragraph 150 of Section A of the Code of Ethics in that, in his capacity as a trustee in bankruptcy, he inappropriately made comments about Mr X to a reporter.
ICAEW	<IP's name removed>	Investigation Committee order: Reprimand and fined £1,000 plus costs.	Between January 2012 and 11 February 2014, <IP's name removed>, as supervisor of the individual voluntary arrangements of Mr and Mrs X did not issue a notice of breach in a timely manner.
ICAEW	<IP's name removed>	Investigation Committee order: Reprimand and fined £500, plus costs.	<IP's name removed>, as supervisor of the IVA of Miss X, did not correct until 15 October 2015 an irregularity at the meeting of creditors until 6 months after being made aware on 25 March 2015 that the vote of a significant creditor had been incorrectly excluded from voting which when subsequently included resulted in the rejection of the IVA.
ICAEW	<IP's name removed>	Insolvency Licensing Committee, Regulatory Penalty of £2,000,00	<IP's name removed> failed to undertake a compliance review in accordance with the requirements of Regulation 3.13 of the <i>Insolvency Licensing Regulations and Guidance Notes</i> .

ICAEW	<IP's name removed>	Investigation Committee order. Reprimand and, fined £3,000 plus costs.	<p>On 10 September 2015 &lt;IP's name removed&gt;, in his capacity as joint administrator of X Limited, sent to creditors his first notification of the pre-packaged sale he completed which did not comply with Statement of Insolvency Practice 16 in that it failed to disclose:</p> <ol style="list-style-type: none"> <li>1. Any reference to the statutory purpose of the administration being pursued or a statement confirming how the statutory purpose has been achieved by the pre-packaged sale;</li> <li>2. The charges granted by the company;</li> <li>3. Sufficient information regarding the valuation of the company's assets, in that it did not state or confirm: <ul style="list-style-type: none"> <li>• which assets were valued;</li> <li>• details of their valuation;</li> <li>• any rationale applied to the valuation or an explanation of sale values compared to that valuation; and</li> <li>• the independence and professional qualifications of the agent.</li> </ul> </li> <li>4. The names of the common directors involved with the company and the purchaser, with regard to whom the sale was a connected party transaction;</li> <li>5. The terms of payment of the sale consideration and any condition of the contract that could materially affect the consideration; and any options, buy-back agreements, deferred consideration or other conditions attached to the contract of sale.</li> </ol>
ICAEW	<IP's name removed>	Agreed restriction on taking personal insolvency appointments - Costs - £7,590 February and 7 March 2017	<p>As a result of a review of the ILC's previous decision to withdraw &lt;IP's name removed&gt;'s licence.</p> <p>The Review Committee has subsequently reinstated &lt;IP's name removed&gt;'s licence because of steps which &lt;IP's name removed&gt; has put in place or has promised to put in place since the ILC's decision.</p>

ICAS	<IP's name removed>	Disciplinary Consent Order. Severe Reprimand and a fine of £3,250 and costs.	In his capacity as trustee in the sequestration of a debtor, he failed to hold a meeting of creditors when requested to do so on 6 August 2014 and 2 September 2014 by two separate creditors who each constituted more than one-third in value of the total creditors in the debtor's sequestration, in breach of his obligations under paragraph 1(b) of Schedule 6 of the Bankruptcy (Scotland) Act 1985.
CAI	<IP's name removed>	Regulatory penalty. £1000 and a follow-up visit	<p>&lt;IP's name removed&gt; was found to be in breach of:</p> <p>Insolvency Licensing Regulation 3.8 as an estimate of fees had not been provided to creditors, although no remuneration had been drawn by the Joint Administrators;</p> <p>Insolvency Licensing Regulation 3.10 in that the requirements of Statements of Insolvency Practice (SIPs) had not been fully complied with, in particular insufficient information was provided to creditors;</p> <p>Insolvency Licensing Regulation 3.12 for failure to have adequate processes and procedures in place to comply with the Insolvency Licensing Regulations in relation to the conduct of insolvency work for which he is responsible.</p>

## Annex 2: Complaints Gateway update

These statistics are for complaints received via the Gateway and do not include complaints generated through monitoring activities or intelligence received by the RPBs.

**Table 11: Number of complaints received (1 January 2017- 31 December 2017)**

Month	Received	Referred	Rejected	On hold
January	71	44	27	0
February	82	38	44	0
March	73	32	41	0
April	53	14	39	0
May	75	39	36	0
June	61	19	42	0
July	56	14	39	2
August	59	27	31	1
September	52	27	24	1
October	65	18	19	28
November	59	19	14	26
December	51	17	7	28
<b>Total</b>	<b>757</b>	<b>308</b>	<b>363</b>	<b>86</b>

**Table 12: Complaints referred by subject matter**

Complaint heading	Number of complaints	% of complaints <sup>17</sup>
Ethics	109	35%
Communication breakdown/failure	92	30%
SIP 3	76	25%
Misconduct / irregularity at creditors meetings	8	3%
Sale / dealing with assets	5	2%
Remuneration	1	Less than 1 %
SIP 2	1	Less than 1 %
SIP 8	0	
SIP 9	0	
SIP 16 / pre-packs	0	
Delay in dividend payment	0	
Other	16	5%
<b>Total</b>	<b>308</b>	<b>100%</b>

<sup>17</sup> Percentage may not add up to 100% as figures are rounded

**Table 13: Detail of complaints relating to ethics**

Type	Number of complaints
Professional competence and due care	80
Conflict of interest	11
Professional behaviour	8
Integrity	8
Other	2
<b>Total</b>	<b>109</b>

**Table 14: Number of complaints by Insolvency procedure**

Insolvency type	Number of complaints	% of complaints
Individual voluntary arrangement (IVA)	133	43%
Liquidation	74	24%
Administration	40	12%
Bankruptcy	31	11%
Trust Deed	18	4%
Company voluntary arrangement (CVA)	6	2%
Sequestration	5	Below 1%
Other	1	Below 1%
<b>Total</b>	<b>308</b>	<b>100%</b>

**Table 15: Number of complaints by complainant type**

Complainant type	Number of complaints	% of complainants <sup>18</sup>
Debtor	140	45%
Creditor	94	31%
Company Director	17	6%
Insolvency Practitioner	10	3%
Employee	6	2%
Debtors spouse	6	2%
Shareholder	3	1%
AiB <sup>19</sup>	3	1%
Other	29	9%
<b>Total</b>	<b>308</b>	<b>100%</b>

<sup>18</sup> Percentage may not add up to 100% as figures are rounded

<sup>19</sup> Accountant in Bankruptcy

**Table 16: Number of complaints referred to the RPBs<sup>20</sup>**

RPB (number of appointment taking IPs at 1/1/17)	Number of complaints referred	% of complaints referred
IPA (472)	164	53.0%
ICAEW (610)	111	36.0%
ACCA (89)	23	7.0%
ICAS (75)	10	3.0%
<b>Total</b>	<b>308</b>	<b>100%</b>

**Table 17: Reasons for rejecting the complaints**

Complaint heading	Number rejected
No response received from complainant to follow up request for further information	220
Complainant about the effect of the insolvency procedure	98
Not a complaint about an IP	36
Already been through complaints process	6
Other <sup>21</sup>	3
<b>Total</b>	<b>363</b>

<sup>20</sup> No complaints were received during 2017 against insolvency practitioners licensed by CAI

<sup>21</sup> Outside jurisdiction : Isle of Man and Gibraltar