



The Insolvency
Service

2015 Annual Review of Insolvency Practitioner Regulation

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Contents

Executive Foreword	2
1. Overview	3
2. Changes to the Law	4
Regulatory objectives and oversight powers	
Fees charged by insolvency practitioners	
Specialised authorisation of insolvency practitioners	
Change to the oversight levy	
3. Regulatory Developments	6
Reducing the number of insolvency regulators	
Changes to professional standards	
National action plan	
Common reviewers	
Pre-pack administrations	
Monitoring visits	
4. Regulatory Activities	8
Monitoring disclosures in pre-pack administrations (SIP 16)	
Themed reviews	
Complaints Gateway	
Complaints about authorising bodies	
Monitoring visits	
5. Forward Look	12
Planned monitoring activity	
Bonding review	
Memorandum of understanding	
Small Business Appeals Champion, Growth Duty and Business Impact Target	
Annex 1: Regulatory and Disciplinary Statistics	14
Annex 2: Complaints Gateway Update	19

Executive Foreword

A year ago, I reflected on the work that still needed to be undertaken to strengthen the regulatory system for insolvency practitioners, highlighting the need for transparent, consistent and robust outcomes.

I am pleased to report that we delivered on our commitments in 2015. Significant changes were made to the legislation. As oversight regulator we are committed to working with the Recognised Professional Bodies (RPBs) to enhance the public perception of insolvency practitioners. We now have an appropriate range of powers to tackle any problems with the regulatory regime, which we believe will increase confidence and benefit the whole industry.

While we continue our drive to improve consistency and transparency, we recognise the need to balance this with the cross government deregulation agenda. Reducing the number of bodies that regulate insolvency practitioners is a welcome step and new regulatory objectives will guide both the work of the RPBs and how we carry out our oversight responsibilities.

We still have work to do. Our areas of focus for 2016 and beyond will be guided by whether stakeholders and we have necessary confidence in the system. We will work to embed the new regulatory objectives and focus on the practical implementation of any necessary changes.

1. Overview

This review summarises key changes introduced in 2015 and the regulatory activities of both the Insolvency Service and the RPBs. As well as business as usual, the last 12 months was a busy period, which saw us working with the RPBs and other stakeholders to implement changes in a number of areas.

We have worked productively in co-operation with the RPBs to implement legislative changes and to adjust to reducing the number of insolvency regulators. Both our work and that of the RPBs will now be shaped by the regulatory objectives introduced from October 2015, and we have gained a range of more proportionate oversight powers to use, if necessary, to tackle any deficiencies in the system.

As well as overarching changes to the regulatory framework, measures have been put in place to tackle on-going concerns about the way in which fees are charged by insolvency practitioners and also in relation to pre-pack administrations. To ensure best practice in these areas, we have worked as part of the Joint Insolvency Committee to introduce changes to relevant professional standards.

The Complaints Gateway continues to work well and all insolvency practitioners are now covered by this system. A number of other changes introduced in previous years have also become embedded, including the publishing of our monitoring reports on visits to the RPBs and the publication of sanctions imposed by the RPBs against insolvency practitioners.

We have delivered on commitments to undertake reviews across a number of areas including insurance arrangements for insolvency practitioners, the monitoring of debt advice and complaints' outcomes. There is more to do in some of these areas alongside the other key work outlined in this report.

2. Changes to the Law

Following independent reviews and consultation, significant changes were introduced in 2015 which have a direct impact on the regulation of the insolvency profession, alter the ways in which fees are charged and will enable insolvency practitioners to specialise in either corporate or personal insolvency cases.

2.1 Regulatory objectives and oversight powers

Measures in the Small Business, Enterprise and Employment Act 2015 (SBEE), which came into effect from 1 October, introduced regulatory objectives to provide the RPBs with a clearer, enhanced, framework within which to carry out their work. In addition, the Act introduced a range of powers for the Insolvency Service (acting on behalf of the Secretary of State) to take action, in appropriate circumstances, against an RPB. These include giving a direction, imposing a financial penalty or issuing a reprimand.

The Insolvency Service also gained new powers to take action through the court against an insolvency practitioner in public interest cases. This is accompanied by new powers to obtain information from insolvency practitioners and connected parties. There are also now clear processes in the law to either remove an existing RPB or to introduce a new body.

To assist the RPBs, insolvency practitioners and all those with an interest in regulatory outcomes, published [guidance](#) provides more detail on both the objectives and powers.

A power has been taken to enable a single regulator to be introduced in place of the current system. This would need to be used by October 2022 and any such move would be subject to consultation and further changes to the law. This power will significantly shape the work that the Insolvency Service carries out in the next few years to evaluate the effectiveness of the current regulatory system.

2.2 Fees charged by insolvency practitioners

In addition to a new objective for regulators to encourage the charging of fair and reasonable costs, changes to the law also require upfront fee estimates to be provided by insolvency practitioners in some types of cases. Any subsequent change to that estimate would need to be agreed with creditors.

Further details on these and other changes are set out in '[Dear IP Issue 68](#)' ([September 2015](#)).

2.3 Specialised authorisation of insolvency practitioners

The law has now been changed to enable insolvency practitioners to specialise in either corporate or personal insolvency cases and we have facilitated discussions between the Joint Insolvency Examination Board (JIEB) and the RPBs to implement the new arrangements.

2.4 Change to the oversight levy

Following engagement with HM Treasury, the levy charged by the Insolvency Service to the RPBs to cover the costs (including overheads) of its oversight regulation functions was raised to £360 per insolvency practitioner member from 1 January. As detailed in an [Impact Assessment](#), the rise was necessary to ensure full cost recovery taking into consideration the Insolvency Service's enhanced role as oversight regulator and was the first increase since 2009.

3. Regulatory Developments

We have continued to work in co-operation with the RPBs and other stakeholders to deliver a range of changes. In addition, we have been involved in cross-Government initiatives looking at the delivery of regulatory functions. This section summarises some of the key developments in 2015.

3.1 Reducing the number of insolvency regulators

The number of bodies which license and regulate insolvency practitioners is being reduced with the voluntary withdrawals of both the Law Society of Scotland (effective from mid-January) and the Law Society of England and Wales (expected to come into effect shortly), and the ending of practitioner authorisation by the Insolvency Service (subject to a transitional period which will end in September).

From October 2016, the Insolvency Service will continue to act as oversight regulator for the 5 remaining RPBs:

- [Association of Chartered Certified Accountants \(ACCA\)](#)
- [Chartered Accountants Regulatory Board \(CARB\)](#)
- [Insolvency Practitioners Association \(IPA\)](#)
- [Institute of Chartered Accountants in England & Wales \(ICAEW\)](#)
- [Institute of Chartered Accountants of Scotland \(ICAS\)](#)

3.2 Changes to professional standards

We have worked as part of the Joint Insolvency Committee to introduce revised and updated standards to reflect both changes to the legislation and insolvency practice. This included issuing 3 revised [Statements of Insolvency Practice \(SIPs\)](#) to introduce enhanced reporting responsibilities for IPs where possible breaches by another practitioner are identified (SIP 1), changes to fee charging (SIP9), and amendments in relation to pre-pack administrations (SIP 16).

3.3 National action plan

We contributed to work being done by the Department of Business Innovation and Skills to develop a national action plan for regulated professionals in the UK. This stemmed from an European Union requirement for Member States to analyse and evaluate the degree of regulation imposed on regulated professions to ensure that their national regulation of professions remains proportionate and does not act as a barrier to professionals from other Member States. We are not expecting any significant changes to the regulatory system as a result of this exercise.

3.4 Common reviewers

We have made positive progress working with the RPBs to implement a panel of common reviewers for complaints and appointments are currently being made. Further work is required to develop standard terms of reference and a time limit by which a complainant would have to make a referral.

3.5 Pre-pack administrations

Following recommendations made by Teresa Graham's [Review into Pre-Pack Administrations](#), a revised [SIP 16](#) requiring enhanced disclosures to creditors and company directors and also the [Pre-pack Pool](#) were introduced in November 2015 with the aim of increasing stakeholder confidence in pre-pack sales. To coincide with the commencement of the revised SIP, which places a greater focus on marketing and connected party transactions, the monitoring of disclosure reports has been passed from the Insolvency Service to the RPBs. These changes will be subject to review in the next year.

4. Regulatory Activities

This section summarises the Insolvency Service's monitoring work during 2015, including the outcomes from visits to RPBs, themed reviews and the handling of complaints.

4.1 Monitoring disclosures in pre-pack administrations (SIP 16)

We continued to monitor compliance with SIP 16 until end of October 2015, at which point responsibility was passed to the RPBs. In future, we will review the outcome of the RPBs' consideration of SIP 16 compliance and will continue to report details in the Annual Review.

In the period January-October 2015, we received SIP 16 disclosure information relating to 336 administrations where the business or assets were sold through a pre-pack transaction. Overall, we were satisfied that 87% of these disclosures were fully compliant with the SIP16 requirements.

As a result of deficiencies in reporting, we contacted 49 insolvency practitioners in relation to 42 companies where a minor breach of the SIP was identified and referred 15 insolvency practitioners to the relevant authorising bodies for the matters to be considered from a regulatory and disciplinary perspective. Those disclosures related to 12 companies, representing just over 4% of the total number of disclosures reviewed.

Analysis of the SIP 16 information indicates that:

- 68% of business or asset sales were to a connected party.
- Marketing activities were carried out by the administrator in 56% of cases.
- An element of the sale consideration was deferred in 56% of cases.

4.2 Themed reviews

Complaints

During the year we carried out a review of all of the RPBs' processes, consideration of complaint handling processes and outcomes, including application of [common sanctions guidance](#).

As a result, we have made a number of recommendations to improve the complaints process and we are in discussion with the RPBs about how these may be adopted. A full report is expected to be published shortly.

Debt advice

We have carried out a high-level review of how the provision of debt advice by insolvency practitioners is monitored by the RPBs. Recommendations are being considered and will be discussed with the RPBs. We expect to carry out further work in this area in 2016-17 and to publish the findings in due course.

Insolvency practitioner office accounts

We carried out a review in early 2015 on the authorising bodies approach to requesting access to insolvency practitioner office accounts for inspection during monitoring visits. We found that not all of the RPBs were in a position to make a request to access these accounts and recommended that steps should be taken to ensure that the relevant powers were available to enable them to do so.

A follow-up review identified that all of the RPBs are now in a position to make a request to access an insolvency practitioner's own office account as part of their monitoring process. It will be for the individual body to determine the appropriate circumstances that give rise to a need to request access to the practitioner's office accounts.

4.3 Complaints Gateway

With the withdrawal of the Law Society of England and Wales and the Law Society of Scotland, the Complaints Gateway now covers all insolvency practitioners for appointments in England, Wales and Scotland. The Gateway continues to receive and filter complaints about practitioners, providing a single entry point from which we are able to track case progression and outcomes.

In 2015, the Gateway received 895 complaints, of these 629 (70%) were referred to the authorising bodies and 237 (30%) were rejected¹.

Improvements have been made during the year with the introduction of a revised form to enable complainants to better understand how to evidence their complaints.

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

4.4 Complaints about authorising bodies

As oversight regulator we will investigate complaints about the authorising bodies. Many of these complaints take the form of dissatisfaction with the outcome, however we can only consider whether an authorising body has failed to follow their own procedure or acted unfairly in dealing with a complaint or reaching a decision.

¹ 29 complaints currently on hold pending further enquiries.

Table: 1 Complaints received about authorising bodies (2015)

Authorising Body	Complaints received	Upheld	Partially upheld	Rejected
ICAEW²	3	-	-	1
IPA³	3	-	-	2
ACCA⁴	2	-	1	1
ICAS	-	-		-
CARB	-	-		-
Solicitors Regulation Authority (SRA)	1	-		1
Insolvency Practitioner Services (IPS)	1			1
Law Society of Scotland (LSS)	-	-		-

The partially upheld complaint concerned the failure of the ACCA to identify its independent reviewer. After conducting a full file review of how the complaint had been dealt with, we considered the ACCA's handling to be in line with its procedures. The refusal to name the independent reviewer is a cause of concern however, also highlighted in our monitoring report, and the complaint was partially upheld for this reason.

4.5 Monitoring visits

We carried out three full monitoring visits and a follow up visit in 2015 and those reports are published on our website. We carry out our visits in collaboration with our colleagues at the Department of Enterprise, Trade and Investment Northern Ireland (DETI).

ICAEW full monitoring visit

We carried out a full monitoring visit to the ICAEW in February 2015, the outcome of which was published in June 2015.

Generally, we found that the ICAEW has strong controls in place in respect of its processes for monitoring its insolvency practitioners, with an effective monitoring schedule and risk assessment.

We identified some weaknesses in relation to the authorisation of insolvency practitioners and bonding arrangements. While some of the complaint files reviewed demonstrated delays in complaint progression and some instances where the ICAEW's controls had weaknesses, these were relatively isolated and historical incidents.

² Two cases are still on-going

³ One case is on-going

⁴ Details of the case below – only providing information on cases upheld or partially upheld by IPRS

Many of the concerns identified have already been addressed by the ICAEW through a series of improvements introduced by their Professional Conduct Department (PCD). As those changes in PCD had only been introduced in November 2014, we decided to undertake a follow-up visit to review the effect of the changes and how our recommendations had been implemented. That visit was completed in February 2016 and the report is expected to be published shortly.

ICAS full monitoring visit

The ICAS inspection visit report was published in June 2015. We found that ICAS had strong controls in place across all processes, very few recommendations were made and we do not propose to conduct a specific follow-up visit.

ACCA follow-up visit

We carried out a follow up visit to the ACCA to review the progress in implementing previous recommendations. Overall, we found that the ACCA had made significant progress in improving its complaints' handling process but concerns remained about the processes and documentation for dealing with unsatisfactory monitoring visits.

To address concerns around the disciplinary process, the ACCA confirmed it is moving toward a new Regulatory Penalty Regime involving consent orders that, once introduced, will enable it to consider potential misconduct which is not sufficiently serious to warrant referral to its Disciplinary Committee.

We remain concerned that there is not a sufficiently independent process for considering the outcome of unsatisfactory monitoring visits to insolvency practitioners. The ACCA has proposed changes to its process for considering the outcome of unsatisfactory monitoring visits and we will assess the effectiveness of these changes on a further monitoring visit scheduled for April 2016.

As mentioned above, we also remain concerned about the lack of transparency for complainants who are not provided with details of the independent assessor who reviews their case.

CARB full monitoring visit

We accompanied DETI on a joint full monitoring visit to CARB in October 2015. As detailed in DETI's published report, CARB had recently introduced new Disciplinary Bye-laws and Regulations and the visit focused on the conduct of monitoring visits and handling of complaints under the previous regulations. While some weaknesses were identified in relation to the publicity of disciplinary sanctions, in general we found that CARB had strong controls in most areas.

5. Forward Look

We will continue our drive for transparency and consistent regulatory outcomes. We will undertake more reviews in 2016/17 which will look at the procedures and practices of all the RPBs.

5.1 Planned monitoring activity

In 2016, we plan to undertake follow-up monitoring visits to ACCA and to carry out a full monitoring visit to the IPA

Following the IPA visit in May, we will have completed a full round of visits to each of the authorising bodies. Our future monitoring schedule will be determined by risk assessment and desktop monitoring of information from each authorising body, relying on more frequent contact with the bodies on individual cases and observing practical work such as monitoring visits by the authorising bodies and the work of committees. We also plan to undertake a number of themed reviews across the remaining 5 RPBs over the next two years. We expect these to include the monitoring of insolvency practitioners, new provisions relating to fees and pre-packs, and follow-up work from this year's reviews.

5.2 Bonding review

All insolvency practitioners are required to hold a bond as security for their functions in order to be qualified to act, which is intended to protect insolvent estates (ultimately, the creditors) from losses due to fraud or dishonesty. The regulatory and legislative framework for these bonds has remained broadly unchanged since 1993.

An on-going review of these arrangements is examining the type and level of cover offered by bonds and considering both the legislative and regulatory arrangements to see if they remain fit for purpose. We have had discussions with key stakeholders to consider issues with the present system.

Once the review is completed and recommendations agreed, we will work with the industry to effect any regulatory changes that may be necessary. Any legislative change would be subject to consultation.

5.3 Memorandum of Understanding (MoU)

Much of our oversight work has historically been determined by the [MoU](#) agreed between the Secretary of State and the RPBs. As future monitoring will largely take place to consider compliance with the new statutory regulatory objectives, we are working with the RPBs to review whether the MoU is still needed. In part, the timing of this will be determined by completion of the current round of monitoring visits to the RPBs and being satisfied that removing the MoU would not substantially weaken the regulatory system.

5.4 Small Business Appeals Champion, Growth Duty and Business Impact Target

The cross-government drive to look at opportunities for deregulation and changes to the way in which regulation is approached and delivered will continue to shape our work. Among other initiatives, we are currently working with colleagues from the Department for Business, Innovation and Skills to implement a raft of changes expected to be introduced in autumn 2016.

Although it is our understanding that the RPBs will not fall into scope of the Small Business Appeals Champion, Growth Duty or Business Impact Target at the present time, as oversight regulator we must have regard to these requirements. Further details are set out in a [consultation document](#).

Annex 1: Regulatory and Disciplinary Statistics

Authorisations

Table 2: Number of insolvency practitioner authorisations (2013-2016)⁵

	ICAEW	ACCA	IPA	SRA	LSS	CARB	ICAS	IPS	Total
IPs at 1st January 2013	701	161	530	133	11	39	96	64	1,735
Appointment takers	563	141	444	21	1	35	85	62	1,352
IPs at 1st January 2014	704	161	547	123	9	46	95	53	1,738
Appointment takers	550	142	460	23	1	42	87	50	1,355
IPs at 1st January 2015	724	151	556	129	6	47	89	43	1,745
Appointment takers	577	137	458	22	1	42	82	40	1,359
IPs at 1st January 2016	770	136	567	0	0	44	96	30	1,643
Appointment takers	580	127	470	0	0	41	82	28	1,328

⁵ It would appear the total number of IPs fell in 2015 due to many non-appointment taking insolvency practitioners formerly with the SRA not moving to other bodies.

Table 3: Insolvency practitioner licences revoked

Body	Date	IP	Reasons
ACCA	2/2/15	<IP's name removed>	A number of breaches of the fundamental principles

Monitoring

Table 4: Number of authorising body monitoring visits to insolvency practitioners⁶

	ICAEW	ACCA	IPA	SRA	LSS	CARB	ICAS	IPS
Routine	195	48	145	4	1	16	22	12
Targeted	1	5	4	0	0	2	1	3

Table 5: Outcomes following monitoring visits to insolvency practitioners concluded in 2015

	ICAEW	ACCA	IPA	SRA	LSS	CARB	ICAS	IPS
Satisfactory	154	46	92	4	1	12	20	11
To be Confirmed		2	42⁷			1	1	1
Further Visit - not yet carried out	3	5	8			3	2	
Referral for investigation	4	3	3					
further information was requested	36							
License withdrawn								
Undertakings and confirmations	6		1			3		
Regulatory penalty/referral for disciplinary consideration	2					1		
Plans for Improvement			5					6

⁶ These are full on site visits to practitioners

⁷ Since all IPA visits result in a full report that is considered at a meeting of its Membership and Authorisation Committee, after providing the member with an opportunity to comment, there is a period of time between a visit and a final outcome being known

Compliance Review/Self Certification requested	29							
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Table 6: Sanctions following complaints in 2015⁸

	ICAEW	ACCA	IPA	SRA	LSS	ICAS	CARB
Warning or caution (not published)	1		14				
Undertaking consent, agreement or fine, Reprimand and fine	3		62				
Exclusion and Fine		2					
On-going into 2016		1					

Table 7: Complaints remaining open over 12 months

Body	2009	2010	2011	2012	2013	2014
ICAEW			4	6	19	55
ACCA	1	1	1	3	1	5
IPA				4	16	30
SRA						
LSS						
ICAS					1	
CARB					1	
Total	1	1	5	12	37	85

Table 8: Summary of regulatory and disciplinary sanctions issued (2015)

Body	IP	Sanction	Reason
IPA	<IP's name removed>	Reprimand, Fine of 1,500, costs of £250	Breach of the fundamental principles and IPA Investigation Committee Rule 4.2 by failing to provide information formally requested from the Investigation Committee.
IPA	<IP's name removed>	Severe Reprimand, Fine of £5000, Costs of £250	Breached the fundamental principle of integrity by misleading the annuities provider when he requested that annuity payments for several bankrupts be made to his former firm's bank account, and signing the documentation as Trustee in Bankruptcy, at a time when he had ceased to act as

⁸ We have not this year included a breakdown of complaint by subject as this is covered in the complaints gateway statistics. The figures in this table may differ from table 8 as consent orders may cover multiple cases

			Trustee in Bankruptcy. Breached the fundamental principle of competence and due care by purporting to sell an asset that he ought to have known could not be transferred.
IPA	<IP's name removed>	Reprimand, fine of £1000, costs of £1000	Breach of the fundamental principles, that in his role as Supervisor, <IP's name removed> failed to address creditors' claims in a timely manner as a result of which the completion of the individual voluntary arrangement was significantly delayed.
IPA	<IP's name removed>	Reprimand and Fine £9,500 and contribution towards costs	Breach of the Fundamental Principles by failing, when he was experiencing case progression issues, to effectively manage systems and communicate with debtors on a number of IVAs, for which he was responsible. (Nov 2010 – June 2015 inclusive)
IPA	<IP's name removed>	Reprimand, Fine of £1,00 and contribution towards costs	Breach of the Fundamental Principles by failing, when he was experiencing case progression issues, to effectively manage systems and communicate with debtors on a number of IVAs, for which he was responsible.
IPA	<IP's name removed>	Reprimand, Fine £1000 and contribution towards costs	Breach of the Fundamental Principles of competence and due care in taking an unreasonable length of time to progress an IVA
IPA	<IP's name removed>	Reprimand, Fine £250 and contribution towards costs	Breach of the Fundamental Principles of competence and due care in failing to comply with Data Protection Act and appropriately communicate with the debtor.
IPA	<IP's name removed>	Reprimand and Fine £750 and contribution towards costs	Breach of the Fundamental Principles of competence and due care in failing to deal with equity in a property in year 4 of an IVA and unreasonable length of time to close an IVA.
IPA	<IP's name removed>	Reprimand and fine £17,500	Breach of the Fundamental Principles by failing, when he was experiencing case progression issues, to effectively manage systems and communicate with debtors on a number of IVAs, for which he was responsible. (Nov 2010-June 2015 inclusive)
IPA	<IP's name removed>	Reprimanded, Fine £2000 and a contribution towards costs	Breach of the Fundamental Principle of professional competence and due care in that he failed to ensure that there was effective communication with debtors, for which he was

			responsible, regarding the implications of entering into a settlement in relation to potential proceeds
ICAEW	<IP's name removed>	Fine £500 and costs of 4,111	Breach of SIP 16, <IP's name removed> failed to include various pieces of information in his disclosure to creditors.
ICAEW	<IP's name removed>	Severe Reprimand, Fine of £15,000	A number of breaches of the Code of Ethics.
ICAEW	<IP's name removed>	Severe Reprimand Fine of £20,000, costs of £5000	Drew unauthorised remuneration and failure to comply with an order of the court.
ACCA	<IP's name removed>	Removed from Membership, pay costs of £6,150	Breach of the fundamental principles of professional competence
ACCA	<IP's name removed>	Removed from Membership, costs of £150,000	A number of breaches of the fundamental principles
ACCA	<IP's name removed>	Suspension of licence for 18 Months	Necessary to do so in order to protect the public.
ACCA	<IP's name removed>	Conditions placed on licence	Breach of SIPs and Insolvency legislation. Failing to take appropriate steps to guard against independence threats when making payments to referrers in the sale of assets; Failing to act with due care and competence and skill required; Taking action that discredited the profession; Inadequate investigation work.

Annex 2: Complaints Gateway update

These statistics are for complaints received via the Gateway and do not include complaints generated through monitoring visits by the RPBs and those arising from SIP1 and SIP16.

Table 9: Number of complaints received (1st January 2015- 31st December 2015)

Month	Received ⁹	Referred	Rejected
January	76	58	18
February	91	66	25
March	86	60	26
April	75	46	29
May	58	41	17
June	92	54	38
July	64	45	19
August	59	41	18
September	69	51	18
October	89	68	21
November	90	68	6
December	46	31	2
Total	895	629	237

Table 10: Complaints referred by subject matter

Complaint heading	Number of complaints ¹⁰	% of complaints ¹¹
SIP 3 (voluntary arrangements)	204	32%
Breach of Ethics	170	27%
Communication breakdown/failure	161	25%
Sale/Dealing with assets	36	6%
Misconduct/irregularity at creditor meetings	23	4%
SIP2 (investigations by officer holders)	18	3%
Remuneration	7	1%
SIP 16/ Pre-pack administrations	6	1%
Delay in dividend payment	3	Below 1%
SIP 9	2	Below 1%
Other	7	1%
Total	637	100%

⁹ 29 cases from November and December were on hold as at 31 January 2016

¹⁰ Figure is higher than total as some complaints have more than one category

¹¹ Percentage may not add up to 100% as figures are rounded

Table 11: Detail of complaints relating to ethics

Type	Number of complaints
Professional competence and due care	102
Conflict of interest	46
Integrity	7
Professional behaviour	6
Confidentiality	3
Commission payments	2
Other	4
Total	170

Table 12: Number of complaints by Insolvency procedure

Insolvency type	Number of complaints	% of complaints
Individual voluntary arrangement (IVA)	242	38%
Liquidation	162	26%
Bankruptcy	116	18%
Administration	60	10%
Company voluntary arrangement (CVA)	15	2%
Trust Deed	16	2%
Sequestration	5	1%
Other	13	2%
Total	629	100%

Table 13: Number of complaints by complainant type

Complainant type	Number of complaints	% of complainants
Debtor	299	48%
Creditor	150	24%
Company Director	45	7%
Insolvency Practitioner	22	4%
Debtors spouse	17	3%
Employee	14	2%
Shareholder	10	2%
Other	72	11%
Total	629	100%

Table 14: Number of complaints referred to the authorising bodies

Authorising body (number of appointment taking IPs at 1/1/16)	Number of complaints referred	% of complaints referred
ICAEW (580)	278	44%
IPA (470)	273	43%
ACCA (127)	47	7%

IPS (28)	18	3%
ICAS (82)	12	2%
CARB (41)	1	Below 1%
Total	629	100%

Table15: Reasons for rejecting the complaints

Complaint heading	Number rejected
No response received from complainant to follow up request for further information	147
Not a complaint about an insolvency practitioner	30
Already been through complaints process	13
Complaint about charge out rates	2
Other	45
Total	237