



Banc Ceannais na hÉireann
Central Bank of Ireland

Eurosystem

Consumer Protection Code Review

Irish Neonatal Health Alliance Response

Response Information

I am completing this form as:

An organisation or representative body

What is the name of your organisation or representative body?

Irish Neonatal Health Alliance www.inha.ie

Please specify your organisation/representative body type.

NGO

Broad Theme A – Availability and Choice

- Q.1 What are your views on availability and choice of financial services and products for consumers?
- Q.2 How important are new providers and new delivery channels to serving consumers' financial needs?
- Q.3 In implementing its consumer protection mandate, how should the Central Bank reflect the importance of competition in its regulatory approach?

Broad Theme B – Firms Acting in Consumers' Best Interests

- Q.4 Do you agree that the Central Bank should develop guidance on what it means for a firm to act in the best interests of its customers?

Agree

- Q.5 Does the suggested outline of 'customer best interest' guidance capture the essence of the obligation to act in customers' best interests? What other guidance would you suggest?

Theme 1 – Innovation and Disruption

- Q.6 Do you agree with our proposed approach to enhancing our Innovation Hub?
- Q.7 What more should be done to support innovation while ensuring consumers' best interests are protected?
- Q.8 How can regulators ensure that neither firms currently in the market, nor new entrants, have unfair advantages which could be a barrier to fair competition?

Theme 2 – Digitalisation

- Q.9 Do you agree with our analysis of the benefits, challenges and risks around digitalisation in the area of financial services? What are the key issues for you?

Q.10 How do you think the personalisation and individual-targeting of ads can be made compatible with the requirement for firms to act in the best interests of customers?

Theme 3 – Unregulated Activities

Q.11 The Code requires regulated firms to provide a statement indicating that they are ‘regulated by the Central Bank’. Do you think this is useful for consumers?

Q.12 How can the difference between regulated and unregulated activities be made clearer for consumers?

Q.13 Should there be additional obligations on regulated firms when they undertake unregulated activities?

Theme 4 – Pricing Matters

Q.14 What can firms do to improve transparency of pricing for consumers?

Q.15 In relation to pricing, are there examples of firms using unfair practices to take advantage of customer vulnerabilities?

Theme 5 – Informing Effectively

Q.16 How can regulation improve effectiveness of information disclosure to consumers?

Q.17 How can firms better support consumers’ understanding – can technology play a role?

Q.18 Does the way in which firms approach disclosure in respect of mortgage products need enhancing? If so, how? - taking account of the wide variety of features of mortgage products, and borrowers’ different circumstances and needs.

Theme 6 – Vulnerability

Q.19 Given that vulnerability should be considered more as a spectrum of risk than a binary distinction, how should firms' duty to act in their customers' best interests reflect this?

We are very concerned that if bereaved parents have life cover, it will usually not cover the death of a baby who is under a certain age. For most insurers, cover tends to begin once the child is 3 months old or even older.

The death of a baby is something that many parents are often completely emotionally and financially unprepared for. Some bereaved parents must rely on the generosity of friends and family or must take out a bank loan to pay for their baby's burial or cremation, funeral, and headstone. In the darkest moment of a bereaved parent's life, they should not have to endure the financial burden of meeting burial / cremation and funeral costs.

The costs involved can include buying a new grave, burial in a family plot or burial in the angel's plot. Some maternity hospitals provide bereaved parents with a coffin for a baby to be buried / cremated, others do not when the parents are holding a private burial from their own home or funeral home. If parents choose to cremate their baby's body, three of crematoria charge no fee to cremate a baby and three charge between 160 euro and 330 euro. The above fees may not include the cost of an urn, courier to return to baby's ashes in an urn, chapel service or burial of the urn. Other additional costs can include a funeral director, the grave digger, flowers and venues and refreshments at gatherings after the funeral.

In certain circumstances, where a family is unable to cover the cost of funeral expenses, they can make an application for an Exceptional Needs Payment under the Supplementary Welfare Allowance scheme available from the Government where a staff member in the local Community Welfare Service office will decide on the application based on the parent's financial circumstances.

It is however still not acceptable that newly bereaved parents whose baby has died are currently contacting their life insurance company to be told that their policy does not cover their baby because they are under a certain age and that they will not receive a payment or that the payment may possibly be made a gesture of goodwill by the insurer if the parent uses their complaints process.

Companies offering life insurance must make sure that when a person is purchasing their life insurance policy, they must be given information about their policy in an understandable way which outlines clearly that there is an age cut-off point in their policies if their baby dies.

Q.20 What other specific measures might be adopted to protect consumers in vulnerable circumstances while respecting their privacy and autonomy?

Theme 7 – Financial Literacy

Q.21 What can the responsible authorities do to improve financial education?

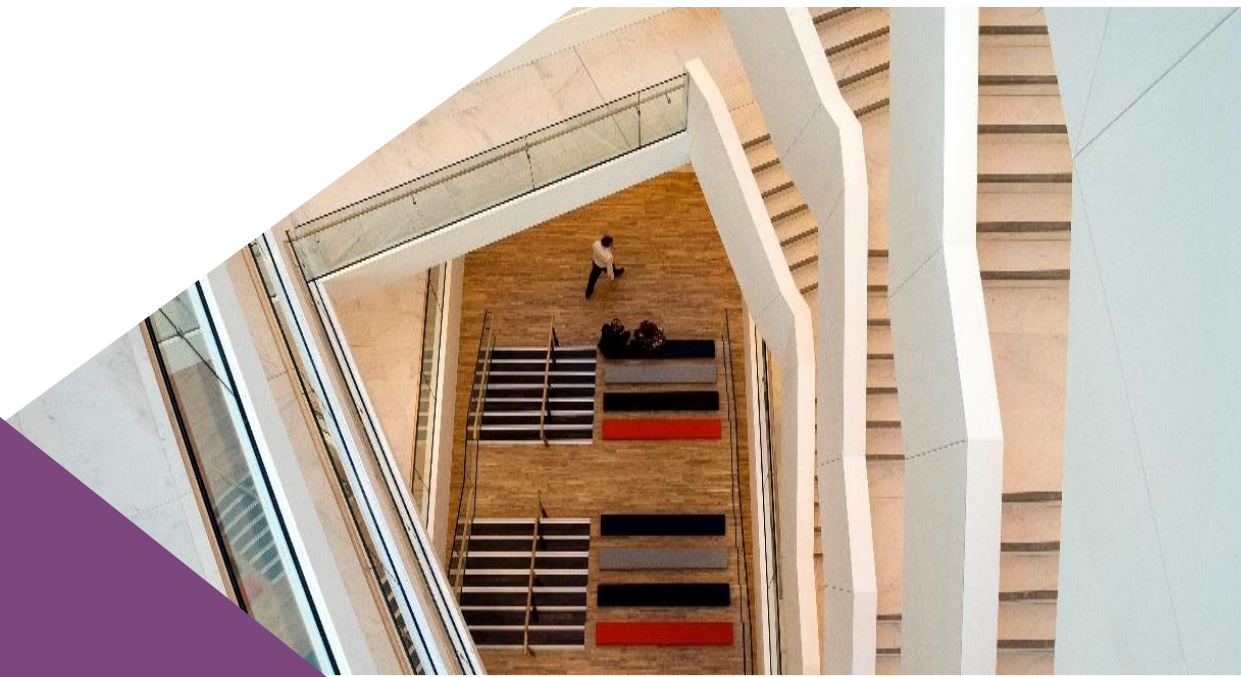
Q.22 How can consumers be empowered to better protect their own interests when dealing with financial matters?

Theme 8 – Climate Matters

Q.23 How should the financial system best fulfil its role in supporting the transition to a climate neutral economy?

Q.24 How will climate change impact on availability, choice and pricing for financial products and services?

Q.25 Does the impact of climate change require additional specific consumer protections?



T: +353 (0)1 224 5800
E: publications@centralbank.ie
www.centralbank.ie



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