CONSUMER CREDIT TRADE ASSOCIATION ANNUAL REPORT AND FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2018

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COMPANY INFORMATION

Directors

G P Stevens

J S Fellows

S Mee

A Claytor

N Leatherland

T J Merrick

P D Ross

F R Johnstone

J Burgess

R J Ashton

(Appointed 20 February 2019)

Company number

00034278

Registered office

Unit G5, Spring Mill

Main Street

Wilsden

Bradford

BD15 0DX

Auditor

BHP LLP

New Chartford House

Centurion Way

Cleckheaton

Bradford

West Yorkshire

BD19 3QB

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DIRECTORS' REPORT

FOR THE YEAR ENDED 31 DECEMBER 2018

The directors present their annual report and financial statements for the year ended 31 December 2018.

Business review

The CCTA, like all other Trade Associations within the Financial Services and Consumer Credit sectors, remains centred on the ongoing changing regulation within our Industry. Financial Services are currently bearing the political brunt as normal parliamentary processes are prostrate, with weak or no challenge of unwise regulation, or even over regulation. An example was an important Treasury Select Committee on the FOS, after a Channel 4 TV 'Dispatches expose' citing inefficiencies and lack of consistency at the Ombudsman's office, was limply dealt with by the Committee.

By the end of 2018 nearly all applicable firms had completed their FCA full authorisation process, and most were reporting to the FCA on their Gabriel computerised system. The FCA were moving swiftly to their supervising role, utilising exception reporting. The full weight of FCA regulation measured by complexity, human resources, and costs has continued to exert more negative financial pressure on SME's, more so than large firms. The increased financial burden in many cases causes closure or merger, as the respective business models struggle because of the increased costs. As the CCTA Members are mainly SME's the impact on the Association remains greater, than for those Associations with larger Members.

Another major disruptor to markets has been the Financial Ombudsman Service where certain business models have been turned on their head through miss selling claims, especially in High Cost Short Term Credit [HCSTC] market. By the end of 2017 there were moves afoot by the Claims Management Companies [CMC's] to widen their gaze towards miss selling of loans on the premise of the consumers being provided with unaffordable loans. In 2018 the level of affordability claims were rising quickly, especially in the pay day lending sector which suffered redress claims on multiple loans.

The CCTA Council recognised that as the decay in the market, and especially the SME's gathered pace, a different solution was required. The Council agreed that the CCTA should have a more distinctive and authoritative voice in the wider Industry, to attract larger firms to become Members, which would bring in more revenue to offset the revenue loss from the small SME's. It was agreed that reserves would be used to build the Public Policy & Public Affairs structure during 2017/2018 in order to gain new Membership from large firms, on the premise that they would be able to finance the ongoing Public Affairs program going forward.

BREXIT delays have meant that progress did not move as swiftly as we would have preferred, instead consumer activists moved apace lobbying the regulator direct, thereby by-passing MP's. We continue to keep the pressure on MP's, in order to address the issues in the consumer credit space. Large firms are understandably nervous of the future, especially if there is a General Election around the corner, with the potential for a Corbyn Government.

We continued our Public Affairs & Public Policy campaign, and had many successes in obtaining feature editorials in the Times, Guardian, and online publications. We increased column inches throughout the year and further established the CCTA as a leading expert and commentator in the consumer credit space. During the year we thwarted several consumer activist campaigners, especially Debt Hacker. On a positive note we had many meetings with Charities and Consumer Groups to explain the Protect Access to Responsible Credit campaign and most agreed with the sentiment, and direction of travel.

CCTA Training once again received star billing, as did the November Conference. The CCTA Team excelled themselves all year round to provide the full range of services. Graham Haxton-Bernard dealt with countless queries to the Legal & Technical helpline, and as always provided Members with sound, timely, and complete advice.

BREXIT remains a mountain to climb for politicians. Prime Minister May is determined to force a deal through the European Union, but different factions across all Parties are thwarting the delivery of the deal. Added to that, the internecine warfare within the Conservative Party is damaging the ability to deal with normal Parliamentary business. The main concern of firms in Financial Services, and Consumer Credit specifically is that there is little to no meaningful scrutiny of the FCA and FOS. Many firms are expressing major concerns of over regulation, rising regulations cost, FOS not being properly audited or regulated, and going way beyond its initial remit.

DIRECTORS' REPORT (CONTINUED)

FOR THE YEAR ENDED 31 DECEMBER 2018

Business review continued...

At the CCTA Conference in November delegates voted overwhelmingly for the CCTA to continue to be a leading voice in consumer credit, and to continue the Public Affairs, Public Policy & Communications approach. We are taking a clear message to Government, Regulators, and Consumer Activists that the protection of access to responsible credit is a core need for consumers, and that the current regulatory thrust and certain redress processes are putting access to credit at risk.

The CCTA Council has continued throughout the year to address the immediate and long- term future of the CCTA, with several routes to market being addressed. Alongside the Public Affairs programme, we are looking at initiatives to collaborate with other Trade Associations to share expertise and costs. The imperative of the CCTA Council is to protect the CCTA brand and legacy, as well as embrace modernity and new ideas. Our 5 Year office lease finished in April 2019, and we have taken the opportunity to save costs, with a move to a smaller new office in Wilsden, a few miles away.

2019 is undoubtedly going to be an equally difficult year politically, as BREXIT will probably go to the wire in October 2019. The CCTA will seek further positive momentum with the Protect Access to Responsible Credit [PARC] campaign and promote its' involvement with all parties to protect our Members, and the end consumer.

Directors

The directors who held office during the year and up to the date of signature of the financial statements were as follows:

G P Stevens

J S Fellows

S Mee

A Claytor

N Leatherland

T J Merrick

P D Ross

J M Davis

(Resigned 1 July 2018)

F R Johnstone

J Burgess

R J Ashton

(Appointed 20 February 2019)

Auditor

In accordance with the company's Articles of Association, a resolution proposing that BHP LLP be reappointed as auditors will be put at the annual general meeting.

DIRECTORS' REPORT (CONTINUED)

FOR THE YEAR ENDED 31 DECEMBER 2018

Statement of directors' responsibilities

The directors are responsible for preparing the annual report and the financial statements in accordance with applicable law and regulations.

Company law requires the directors to prepare financial statements for each financial year. Under that law the directors have elected to prepare the financial statements in accordance with United Kingdom Generally Accepted Accounting Practice (United Kingdom Accounting Standards and applicable law). Under company law the directors must not approve the financial statements unless they are satisfied that they give a true and fair view of the state of affairs of the company and of the surplus or deficit of the company for that period. In preparing these financial statements, the directors are required to:

- select suitable accounting policies and then apply them consistently;
- make judgements and accounting estimates that are reasonable and prudent;
- prepare the financial statements on the going concern basis unless it is inappropriate to presume that the company will continue in business.

The directors are responsible for keeping adequate accounting records that are sufficient to show and explain the company's transactions and disclose with reasonable accuracy at any time the financial position of the company and enable them to ensure that the financial statements comply with the Companies Act 2006. They are also responsible for safeguarding the assets of the company and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.

The directors are responsible for the maintenance and integrity of the company website. Legislation in the United Kingdom governing the preparation and dissemination of financial statements may differ from legislation in other jurisdictions.

Statement of disclosure to auditor

So far as the directors are aware, there is no relevant audit information of which the company's auditors are unaware. Additionally, the directors have taken all necessary steps that they ought to have taken as directors in order to make themselves aware of all relevant audit information and to establish that the company's auditors are aware of that information.

This report has been prepared in accordance with the provisions applicable to companies entitled to the small companies exemption.

On behalf of the board

G P Stevens

Director

12-09-19

INDEPENDENT AUDITOR'S REPORT

TO THE MEMBERS OF CONSUMER CREDIT TRADE ASSOCIATION

Opinion

We have audited the financial statements of Consumer Credit Trade Association (the 'company') for the year ended 31 December 2018 which comprise the income and expenditure account, the balance sheet and notes to the financial statements, including a summary of significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards, including FRS 102 *The Financial Reporting Standard applicable in the UK and Republic of Ireland* (United Kingdom Generally Accepted Accounting Practice).

In our opinion the financial statements:

- give a true and fair view of the state of the company's affairs as at 31 December 2018 and of its deficit for the year then ended;
- have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice;
 and
- · have been prepared in accordance with the requirements of the Companies Act 2006.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the *Auditor's responsibilities for the audit of the financial statements* section of our report. We are independent of the company in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Conclusions relating to going concern

We have nothing to report in respect of the following matters in relation to which the ISAs (UK) require us to report to you where:

- the directors' use of the going concern basis of accounting in the preparation of the financial statements is not appropriate; or
- the directors have not disclosed in the financial statements any identified material uncertainties that may
 cast significant doubt about the company's ability to continue to adopt the going concern basis of accounting
 for a period of at least twelve months from the date when the financial statements are authorised for issue.

Other information

The directors are responsible for the other information. The other information comprises the information included in the annual report, other than the financial statements and our auditor's report thereon. Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the financial statements or a material misstatement of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

Opinions on other matters prescribed by the Companies Act 2006

In our opinion, based on the work undertaken in the course of our audit:

- the information given in the directors' report for the financial year for which the financial statements are prepared is consistent with the financial statements; and
- the directors' report has been prepared in accordance with applicable legal requirements.

INDEPENDENT AUDITOR'S REPORT (CONTINUED) TO THE MEMBERS OF CONSUMER CREDIT TRADE ASSOCIATION

Matters on which we are required to report by exception

In the light of the knowledge and understanding of the company and its environment obtained in the course of the audit, we have not identified material misstatements in the directors' report.

We have nothing to report in respect of the following matters where the Companies Act 2006 requires us to report to you if, in our opinion:

- adequate accounting records have not been kept, or returns adequate for our audit have not been received from branches not visited by us; or
- · the financial statements are not in agreement with the accounting records and returns; or
- · certain disclosures of directors' remuneration specified by law are not made; or
- · we have not received all the information and explanations we require for our audit; or
- the directors were not entitled to prepare the financial statements in accordance with the small companies
 regime and take advantage of the small companies' exemption in preparing the directors' report and take
 advantage of the small companies exemption from the requirement to prepare a strategic report.

Responsibilities of directors

As explained more fully in the directors' responsibilities statement, the directors are responsible for the preparation of the financial statements and for being satisfied that they give a true and fair view, and for such internal control as the directors determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the directors are responsible for assessing the company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the directors either intend to liquidate the company or to cease operations, or have no realistic alternative but to do so.

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: http://www.frc.org.uk/auditorsresponsibilities. This description forms part of our auditor's report.

INDEPENDENT AUDITOR'S REPORT (CONTINUED) TO THE MEMBERS OF CONSUMER CREDIT TRADE ASSOCIATION

Use of our report

This report is made solely to the company's members, as a body, in accordance with Chapter 3 of Part 16 of the Companies Act 2006. Our audit work has been undertaken so that we might state to the company's members those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the company and the company's members, as a body, for our audit work, for this report, or for the opinions we have formed.

Lesley Kendrew (Senior Statutory Auditor) for and on behalf of BHP LLP

Chartered Accountants Statutory Auditor

25 September 2019

New Chartford House Centurion Way Cleckheaton Bradford West Yorkshire BD19 3QB

INCOME AND EXPENDITURE ACCOUNT FOR THE YEAR ENDED 31 DECEMBER 2018

	2018	2017
	£	£
Income	583,032	653,402
Cost of sales	(224,825)	(228,364)
Gross surplus	358,207	425,038
Administrative expenses	(465,284)	(542,537)
Operating deficit	(107,077)	(117,499)
Interest receivable and similar income	418	93
Interest payable and similar expenses	-	(566)
Deficit before taxation	(106,659)	(117,972)
Tax on deficit	-	(17,595)
Deficit for the financial year	(106,659)	(135,567)
-		

BALANCE SHEET AS AT 31 DECEMBER 2018

		201	18	201	7
	Notes	£	£	£	£
Fixed assets					
Tangible assets	3		9,627		17,187
Current assets					
Debtors	4	81,792		157,266	
Cash at bank and in hand		446,304		501,614	
		528,096		658,880	
Creditors: amounts falling due within					
one year	5	(332,251)		(363,936)	
Net current assets			195,845		294,944
Total assets less current liabilities			205,472		312,131
			=		
Reserves					
Other reserves			50,000		50,00Ò
Income and expenditure account			155,472		262,131
Members' funds			205,472		312,131

These financial statements have been prepared in accordance with the provisions applicable to companies subject to the small companies regime.

G P Stevens

Director

Company Registration No. 00034278

NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2018

1 Accounting policies

Company information

Consumer Credit Trade Association is a private company limited by guarantee incorporated in England and Wales. The registered office is Unit G5, Spring Mill, Main Street, Wilsden, Bradford, BD15 0DX.

1.1 Accounting convention

These financial statements have been prepared in accordance with FRS 102 "The Financial Reporting Standard applicable in the UK and Republic of Ireland" ("FRS 102") and the requirements of the Companies Act 2006 as applicable to companies subject to the small companies regime. The disclosure requirements of section 1A of FRS 102 have been applied other than where additional disclosure is required to show a true and fair view.

The financial statements are prepared in sterling, which is the functional currency of the company. Monetary amounts in these financial statements are rounded to the nearest £.

The financial statements have been prepared under the historical cost convention. The principal accounting policies adopted are set out below.

1.2 Going concern

The directors have prepared financial projections and carried out a detailed review of the Association's resources and are satisfied that the Association has sufficient cash flows to meet its liabilities as they fall due for at least twelve months from the date of approval of the financial statements. Accordingly, the financial statements have been prepared on a going concern basis.

1.3 Income and expenditure

Income and expenses are included in the financial statements as they become receivable or due.

Expenses include VAT where applicable as the company cannot reclaim it.

1.4 Tangible fixed assets

Tangible fixed assets are initially measured at cost and subsequently measured at cost or valuation, net of depreciation and any impairment losses.

Depreciation is recognised so as to write off the cost or valuation of assets less their residual values over their useful lives on the following bases:

Leasehold improvement

Over the remaining lease term

Plant and machinery

25% straight line

Fixtures, fittings & equipment

33.3% straight line

The gain or loss arising on the disposal of an asset is determined as the difference between the sale proceeds and the carrying value of the asset, and is credited or charged to surplus or deficit.

1.5 Impairment of fixed assets

At each reporting period end date, the company reviews the carrying amounts of its tangible assets to determine whether there is any indication that those assets have suffered an impairment loss. If any such indication exists, the recoverable amount of the asset is estimated in order to determine the extent of the impairment loss (if any). Where it is not possible to estimate the recoverable amount of an individual asset, the company estimates the recoverable amount of the cash-generating unit to which the asset belongs.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2018

1 Accounting policies

(Continued)

Recoverable amount is the higher of fair value less costs to sell and value in use. In assessing value in use, the estimated future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset for which the estimates of future cash flows have not been adjusted.

If the recoverable amount of an asset (or cash-generating unit) is estimated to be less than its carrying amount, the carrying amount of the asset (or cash-generating unit) is reduced to its recoverable amount. An impairment loss is recognised immediately in surplus or deficit, unless the relevant asset is carried at a revalued amount, in which case the impairment loss is treated as a revaluation decrease.

Recognised impairment losses are reversed if, and only if, the reasons for the impairment loss have ceased to apply. Where an impairment loss subsequently reverses, the carrying amount of the asset (or cash-generating unit) is increased to the revised estimate of its recoverable amount, but so that the increased carrying amount does not exceed the carrying amount that would have been determined had no impairment loss been recognised for the asset (or cash-generating unit) in prior years. A reversal of an impairment loss is recognised immediately in surplus or deficit, unless the relevant asset is carried at a revalued amount, in which case the reversal of the impairment loss is treated as a revaluation increase.

1.6 Cash at bank and in hand

Cash at bank and in hand are basic financial assets and include cash in hand, deposits held at call with banks, other short-term liquid investments with original maturities of three months or less, and bank overdrafts. Bank overdrafts are shown within borrowings in current liabilities.

1.7 Financial instruments

The company has elected to apply the provisions of Section 11 'Basic Financial Instruments' and Section 12 'Other Financial Instruments Issues' of FRS 102 to all of its financial instruments.

Financial instruments are recognised in the company's balance sheet when the company becomes party to the contractual provisions of the instrument.

Financial assets and liabilities are offset, with the net amounts presented in the financial statements, when there is a legally enforceable right to set off the recognised amounts and there is an intention to settle on a net basis or to realise the asset and settle the liability simultaneously.

Basic financial assets

Basic financial assets, which include debtors and cash and bank balances, are initially measured at transaction price including transaction costs and are subsequently carried at amortised cost using the effective interest method unless the arrangement constitutes a financing transaction, where the transaction is measured at the present value of the future receipts discounted at a market rate of interest. Financial assets classified as receivable within one year are not amortised.

Classification of financial liabilities

Financial liabilities and equity instruments are classified according to the substance of the contractual arrangements entered into. An equity instrument is any contract that evidences a residual interest in the assets of the company after deducting all of its liabilities.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2018

1 Accounting policies

(Continued)

Basic financial liabilities

Basic financial liabilities, including creditors, bank loans, loans from fellow group companies and preference shares that are classified as debt, are initially recognised at transaction price unless the arrangement constitutes a financing transaction, where the debt instrument is measured at the present value of the future payments discounted at a market rate of interest. Financial liabilities classified as payable within one year are not amortised.

Debt instruments are subsequently carried at amortised cost, using the effective interest rate method.

Trade creditors are obligations to pay for goods or services that have been acquired in the ordinary course of business from suppliers. Amounts payable are classified as current liabilities if payment is due within one year or less. If not, they are presented as non-current liabilities. Trade creditors are recognised initially at transaction price and subsequently measured at amortised cost using the effective interest method.

1.8 Derivatives

Derivatives are initially recognised at fair value at the date a derivative contract is entered into and are subsequently remeasured to fair value at each reporting end date. The resulting gain or loss is recognised in surplus or deficit immediately unless the derivative is designated and effective as a hedging instrument, in which event the timing of the recognition in surplus or deficit depends on the nature of the hedge relationship.

A derivative with a positive fair value is recognised as a financial asset, whereas a derivative with a negative fair value is recognised as a financial liability.

1.9 Taxation

The tax expense represents the sum of the tax currently payable and deferred tax.

The tax currently payable is based on taxable profit for the year. Taxable profit differs from net profit as reported in the profit and loss account because it excludes items of income or expense that are taxable or deductible in other years and it further excludes items that are never taxable or deductible. The company's liability for current tax is calculated using tax rates that have been enacted or substantively enacted by the reporting end date.

Deferred tax liabilities are generally recognised for all timing differences and deferred tax assets are recognised to the extent that it is probable that they will be recovered against the reversal of deferred tax liabilities or other future taxable profits. Such assets and liabilities are not recognised if the timing difference arises from goodwill or from the initial recognition of other assets and liabilities in a transaction that affects neither the tax profit nor the accounting profit.

The carrying amount of deferred tax assets is reviewed at each reporting end date and reduced to the extent that it is no longer probable that sufficient taxable profits will be available to allow all or part of the asset to be recovered. Deferred tax is calculated at the tax rates that are expected to apply in the period when the liability is settled or the asset is realised. Deferred tax is charged or credited in the profit and loss account, except when it relates to items charged or credited directly to equity, in which case the deferred tax is also dealt with in equity. Deferred tax assets and liabilities are offset when the company has a legally enforceable right to offset current tax assets and liabilities and the deferred tax assets and liabilities relate to taxes levied by the same tax authority.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2018

1 Accounting policies

(Continued)

1.10 Employee benefits

The costs of short-term employee benefits are recognised as a liability and an expense, unless those costs are required to be recognised as part of the cost of stock or fixed assets.

The cost of any unused holiday entitlement is recognised in the period in which the employee's services are received.

Termination benefits are recognised immediately as an expense when the company is demonstrably committed to terminate the employment of an employee or to provide termination benefits.

1.11 Retirement benefits

Payments to defined contribution retirement benefit schemes are charged as an expense as they fall due.

1.12 Leases

Rentals payable under operating leases, including any lease incentives received, are charged to profit or loss on a straight line basis over the term of the relevant lease except where another more systematic basis is more representative of the time pattern in which economic benefits from the leases asset are consumed.

2 Employees

The average monthly number of persons (including directors) employed by the company during the year was 5 (2017 - 5).

3 Tangible fixed assets

	Land and buildings	Plant and machinery etc	Total
	£	£	£
Cost			
At 1 January 2018 and 31 December 2018	7,500	42,559	50,059
Depreciation and impairment			
At 1 January 2018	5,317	27,555	32,872
Depreciation charged in the year	1,636	5,924	7,560
At 31 December 2018	6,953	33,479	40,432
O control constant			
Carrying amount			
At 31 December 2018	547	9,080	9,627
	====		====
At 31 December 2017	2,183	15,004	17,187
	====		

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2018

4	Debtors		
		2018	2017
	Amounts falling due within one year:	£	£
	Service charges due	76,011	150,718
	Other debtors	5,781	6,548
		81,792	157,266
			
5	Creditors: amounts falling due within one year		
	,	2018	2017
		£	£
	Trade creditors	28,506	30,688
	Trade creditors Taxation and social security	28,506 35,404	30,688 31,240
	Taxation and social security	35,404	31,240

6 Members' liability

The company is limited by guarantee, not having a share capital and consequently the liability of members is limited, subject to an undertaking by each member to contribute to the net assets or liabilities of the company on winding up such amounts as may be required not exceeding £1.

7 Operating lease commitments

Lessee

At the reporting end date the company had outstanding commitments for future minimum lease payments under non-cancellable operating leases, as follows:

2018	2017
£	£
11,561	37,221