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Regulators and industry

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Regulatory and industry engagement

We actively contribute to a wide range of initiatives across the collections and debt advice sectors, to help Build Better Financial Futures for our customers. During the year, Arrow has actively contributed to a wide range of initiatives across the collections and debt advice sectors.

In 2018, we held a number of important industry positions:

- After an extended three-year presidency of the Credit Services Association (CSA) we retained a board seat for Public and European Affairs, promoting constructive and collaborative relationships with government and regulators, the debt advice sector and other stakeholders, to ensure they are made aware of the processes and high standards of Arrow and the rest of the membership of the CSA.
- Member of the Steering Committee on Reciprocity (SCOR), which governs the rules for credit data sharing in the UK, bringing about important new rules and safeguards for the use of credit data by debt buyers.
- The vice presidency of the Federation of European National Collection Associations (FENCA). Persistent FENCA lobbying to the department of justice resulted in significant changes to the final wording of the EU General Data Protection Regulation (GDPR), and we hold the responsibility through FENCA of developing a Code of Conduct for GDPR for the collections industry and liaison on the proposed EU Directive for debt collection and purchase. A draft Code has now been approved in 2019. This Code will help provide a level playing field for our customers across Europe, and clarity on GDPR industry regulation.
- Through FENCA, we have also contributed to consultations on the NPL secondary market, particularly the draft EU Directive regulating credit servicers and purchasers. We attended meetings with high-ranking officials who are responsible for EU policy on banking and finance.
- We hold a board position on the influential Money Advice Liaison Group, and a trusteeship of the FairLife Charity, promoting fair treatment of the consumer across financial services. We also hold the 2019 presidency of the prestigious International Collectors Group, organising the annual ICG conference in Portugal.
- In addition to our various CSR initiatives at Group and country level, specialising in financial education and data philanthropy, we have supported major debt charities during the year, assisting Citizens Advice to implement its Debt Management Service pilot, and helping Christians Against Poverty (CAP) toward its successful matched funding target. As a responsible industry partner, we also fully funded FairShare contributions to StepChange, Payplan and Christians Against Poverty.



We have continued to actively engage at numerous trade body events and conferences during 2018, and we chaired and presented regularly at non-performing loan and industry events and conferences throughout the year. We have a constructive and open relationship with the FCA and other European regulators. We also contributed to the Money Advice Service Debt Advice Operational Group, considering the future funding of debt advice as a result of Peter Wyman's report, and contributing a well-regarded case study indicating the benefits of free financial advice to our customers.

Arrow remains fully committed to raising standards, promoting fairer practices in the collection of debt by government and other sectors we are active in, lobbying for the Single Financial Guidance Body to be an effective successor to The Money Advice Service, and supporting better financial futures for children and adults who, as shown by our updated 2018 Debt Britain report, are so often in need of our help and support.

Supporting human rights

All of the Group's current activities are carried out in developed countries that have strong legislation governing human rights, and Arrow complies with applicable legislation in every country where it operates.

Sustainability – caring for the environment

Due to the nature of its business activities, the Group's environmental impact is considered minimal. An environmental policy is in place to increase employee awareness of environmental issues and complies with all relevant regulatory requirements.

With the acquisitions made in the last three years, the Group now has a truly European structure. This has inevitably seen an increase in international travel, but to reduce the impact of this and other travel on our carbon footprint, we actively encourage colleagues to increase the use of video and telephone conferencing facilities.

In the UK, we offer colleagues, a cycle to work scheme and, at appropriate sites, we have car shares and group transport schemes in place.

Key areas of the policy addressing the business' environmental impact are as follows:

- minimising paper usage and the purchase of recycled paper and packaging where possible;
- energy efficient office products;
- recycling office waste;
- increased use of video and conference calls and Skype for business facilities; and
- only booking travel for essential business reasons.



Industry boards hold an Arrow representative

Reporting requirement	Some of our relevant policies	Relevant information including our impact and principal risks
Environmental matters	Environmental policy	Caring for the environment, page 41 Environmental policy and carbon reporting, pages 84 to 85
Employees	Equality and diversity policy	Employee engagement, page 36 Reward and recognition, page 37 Fairness and inclusivity, page 37 Diversity, page 65 Employee consultation, page 84
Human rights	Human rights policy	Supporting human rights, page 41 Modern slavery statement: www.arrowglobalir.net
Social matters	Corporate social responsibility policy	Building financial literacy, page 38 Supporting debt charities, page 39 Helping our local communities, page 39 Regulatory and industry engagement, page 40 Regulatory risk, page 47
Anti-bribery and corruption	Anti-bribery and corruption policy Whistleblowing policy	Bribery Act compliance, page 57 Whistleblowing, page 84
Business model	N/A	Business model, pages 12 to 13
Non-financial KPIs	N/A	Our stakeholders, pages 32-41 GhC emissions, page 85