

Hi Emma,

Thank you for the opportunity to provide our feedback on this. Please find my answers below and we would be very happy to discuss things in more detail.

Q1: What are your views on the review objectives set out on page 4? Has the PSA got the right scope or are there areas the PSA should include or exclude?

Yes, we think this is a good scope.

Q2: Some subscriptions generate high levels of complaints, whereas others with similar numbers of subscribers generate very few. Do you have any views on the regulatory measures that would better support growth and innovation across the subscriptions, whilst ensuring consumers are protected from harm?

PSA should consider carving out slightly different rules for different sectors. We think it's very difficult to have a 'one-size-fits-all' approach to regulation and approve of special conditions existing to ensure that regulation is as tailored as necessary to allow services to operate successfully while avoiding consumer harm. The charity sector accepts large number of regular donations, has high supporter satisfaction and very low levels of complaints both overall and particularly in relation to the mechanism of regular donations.

Indeed there is existing protection built into the existing recurring donation Special Condition, where supporters are given the opportunity to SKIP the day before their donation is made, such that some of the remaining conditions seem overly onerous. We would welcome a pilot where the frequency of the stop reminder is altered so that we can properly assess whether or not supporters value this message or view it as a nuisance and whether there is any increase in supporter care resulting from any change.

Q3: Do you agree that different subscription services may require different regulatory responses? Do you have any thoughts on what this variation could look like?

Yes, we agree. As outlined above we believe that different sectors of the industry should be separated out according to the types of subscriptions they offer, levels of complaints and what regulation is most appropriate.

Q4: Is there any other information or evidence that you would like to provide to PSA to assist it to undertake more detailed analysis of the existing framework, including around where you see subscriptions heading?

We would be happy to discuss opportunities to improve the framework for charitable services, based on the feedback which we are receiving, as part of the more detailed analysis.

Regards,

[Redacted]

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