
Insights and Themes October – December 2024

CHRIS BLANK – SENIOR INTELLIGENCE ANALYST

24 March 2025



Investigation and enforcement action: October – December 2024

Current Investigations

- At the end of the October - December quarter, we had **31** active investigations covering several potential breaches.
- The following table sets out the top five areas of potential breaches, along with the number of potential breaches, that we are investigating.

Number of potential breaches being investigated	What we are investigating
73	Lender responsibility principles (33 being specifically about affordability and suitability assessments)
21	Disclosure obligations
4	Certification/Registration
4	Unreasonable credit fee or default fee
4	Repossession/debt enforcement

Recent compliance and enforcement activity – Information Passed to Trader (IPTT)

- During the October - December 2024 quarter, we determined that an IPTT was the appropriate outcome for **five** complaints, in relation to responsible lending principles, disclosure issues, and certification.
- We also issued more than **14 IPTTs** to lenders that failed to notify the Commission of prescribed changes in circumstances relating to the appointment and/or resignation of directors and senior managers.
- We follow up with lenders who are issued an IPTT to find out if the areas of concern raised in the IPTT have been addressed.

Recent compliance and enforcement activity – Compliance Advice Letter (CAL)

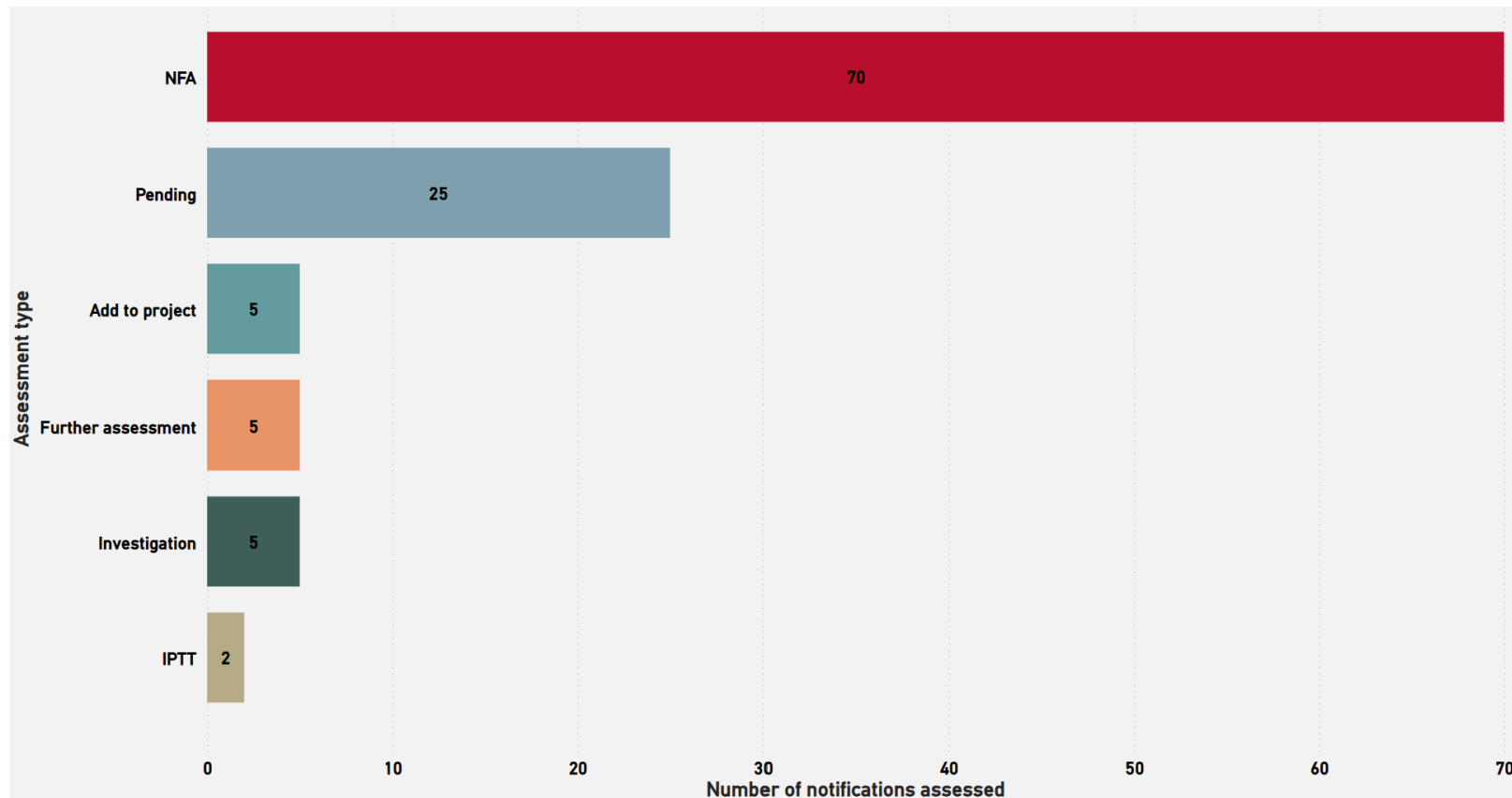
- During the October - December 2024 quarter, we determined that a CAL was the appropriate enforcement outcome for **three** investigations in relation to hardship processes and certification.
- We follow up with lenders who are issued CALs to find out if the conduct referred to in the CAL is ongoing and/or what changes have been made by the lender to address the conduct.



Insights from notification data: October – December 2024

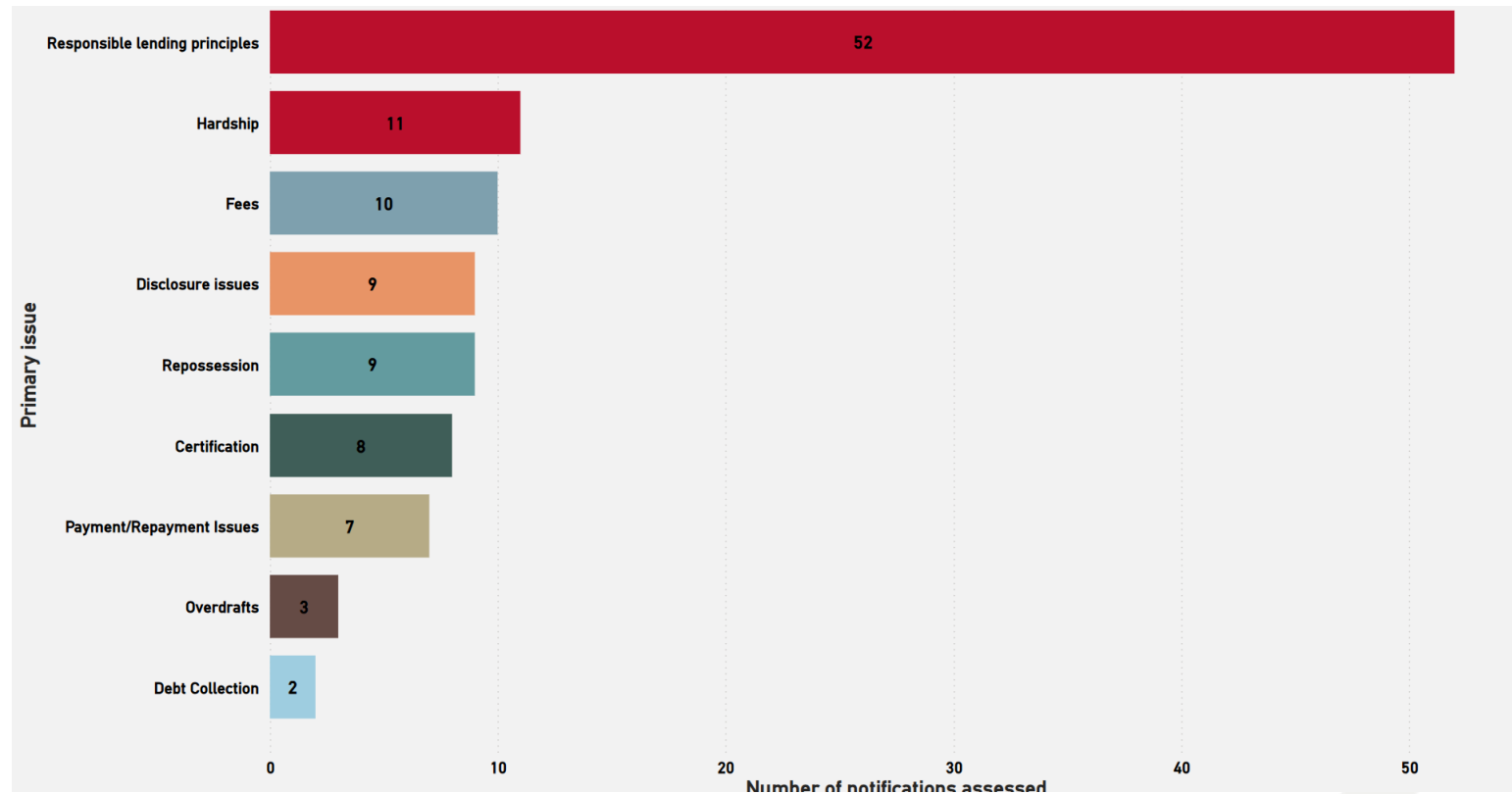
Insights from complaints/notifications

Outcome of assessments made on CCCF Act notifications received by the Commerce Commission between 1 October 2024 – 31 December 2024



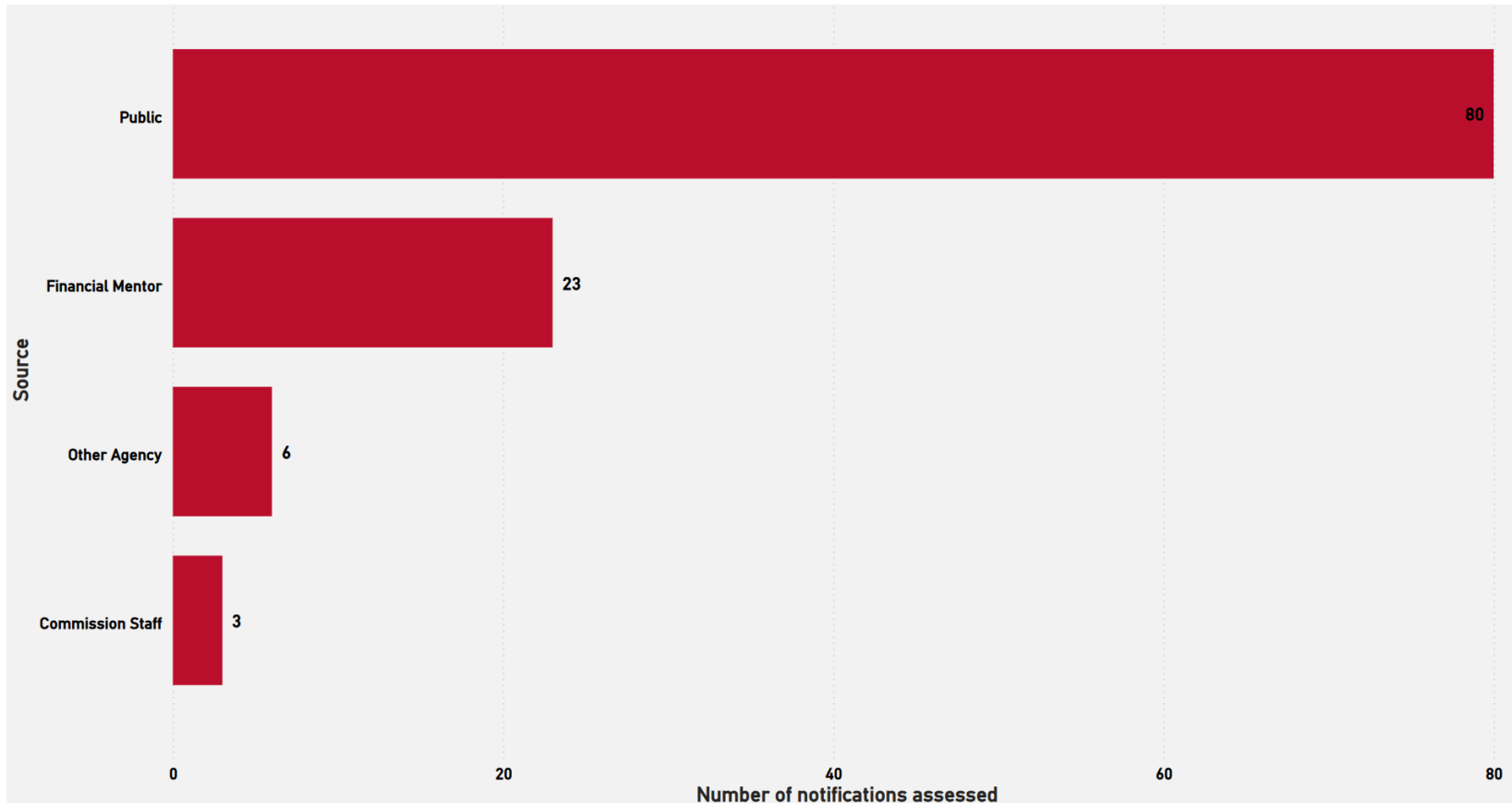
Insights from complaints/notifications

Primary issues identified from CCCF Act notifications received by the Commerce Commission between 1 October 2024 – 31 December 2024



Insights from complaints/notifications

The source of CCCF Act notifications received by the Commerce Commission between 1 October 2024 – 31 December 2024



Ngā mihi

comcom.govt.nz

