



# **PRINCIPLES OF RECIPROCITY**

## **CRA PRODUCT DEVELOPMENT**

## **COMPLIANCE PROCESS**

Version : 1

Status : SCOR Approved (July 2003)

## **Background**

The procedures below have been prepared in order to provide clarity around the process under which new CRA products and services, which utilise shared data, are brought to the marketplace.

The process has been designed to recognise the importance of both :

- ❑ Ensuring that all new CRA products/services comply with the Principles of Reciprocity (POR).
- ❑ Innovation, together with the commercial sensitivity attached to such developments.

## **Process**

1. Through documented internal consultation, the CRA compliance team should reach a decision as to whether the proposal represents a NEW use of shared data. The SCOR representative may not necessarily be from within the compliance team, but he/she must be involved in such a consultation. (All new CRA products/services, which use shared data, must have internal compliance sign-off).
2. **If it is concluded that the proposed use of shared data is already covered by the POR, or an existing Policy Recommendation, then no formal reference needs to be made to SCOR.** However, the CRA may wish to discuss the proposal informally with the SCOR Chair and/or other representatives.
3. In the case that the proposal is seen to represent a NEW use of shared data, or if there is some doubt that it fully complies with the POR, then a brief summary of the proposal should be prepared and forwarded to the Secretary of SCOR.
4. The Secretary should then include the proposal for discussion at the next available meeting of SCOR, in the absence of other CRAs.
5. However, where a decision is required more urgently, the CRA may chose to forward (via the Secretary) a written proposal to all SCOR representatives (*except those from other CRAs*).
6. If the course of action discussed at 5 above is followed, the proposal should then be reviewed by each Trade Association representative, who should respond within two weeks (see notes) as follows :

**APPROVE :**      **The proposed use of shared data is already covered under the POR**

**REVIEW :**        **Needs to be debated at SCOR and/or within Trade Associations**

Notes : The process for “APPROVE” assumes that Trade Associations are comfortable that their SCOR representatives are mandated to make this decision.

It is recognised that, with holidays etc, responses within two weeks will not always be possible. However, this should be the target turnaround time.

7. Upon receipt of the responses, the Secretary of SCOR should consider the position, as follows :

If all responses are “**APPROVE**”, then the decision should be relayed to the originating CRA. Trade Association representatives should be informed.

However, if there are one or more responses of “**REVIEW**”, then :

The position should be advised to the originating CRA and the issue placed on the agenda of the next available SCOR meeting.

- Trade Association representatives should be updated and must ensure that, at this point, views are taken from their Trade Association Executive and wider membership, so that the issue can be discussed and (normally) concluded at the SCOR meeting.
- Where possible, views should ideally be sought via an exchange of Emails. Alternatively, it may be necessary to delay such a review until the next scheduled Trade Association meeting.

8. Following debate at the SCOR meeting (*in the absence of those from other CRAs*), a decision should be reached as follows :

- The proposed new use of shared data is **RECOMMENDED** by SCOR
- The proposed new use of shared data is **DECLINED** by SCOR as it stands, but will be **RECOMMENDED** if certain changes are made to the specification of the product/service and acceptance of these changes is confirmed in writing to the Secretary of SCOR.
- The proposed new use of shared data is **DECLINED** by SCOR

**No Policy Recommendation will override the contractual relationship between the individual subscriber and their CRA(s)**

## **POLICY RECOMMENDATIONS**

From time to time, the review of a proposed new use of shared data will lead to a “Policy Recommendation” from SCOR. In such circumstances, it is imperative that all CRAs are made aware of the Policy Recommendation, in order to maintain a competitive “level playing field”. Such advice should not divulge any commercially sensitive information, but must focus specifically on how shared data will be used.

Policy recommendations will be advised to all CRAs, via the SCOR Secretary, after a period of **6 months**, which protects innovation and avoids any CRA being discouraged from approaching SCOR.

### **Note**

**ALL policy recommendations must be subject to formal Trade Association ratification.**