



Credit Information Governance Body

Appeals Policy

Version	Date	Owner	Author	Approved by	Document Location	Comments
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Introduction

As an open and accountable organisation, CIGB understands that from time to time stakeholders may have cause to appeal against decisions that have been made by the CIGB Board. Such occasions include, without limitation, the following:

- a) A stakeholder has identified a mistake in CIGB's analysis which underpins the decision or otherwise questions the strength of CIGB's analytical techniques.*
- b) A stakeholder believes CIGB has failed to appropriately account for/incorporate relevant evidence in its analysis or has unduly disregarded evidence.*
- c) A stakeholder has identified an implementation option in relation to a decision for which CIGB has not considered.*

CIGB has strict and clear guidance on how decisions are made within the Board Constitution and Decision Making Policy (the "**Constitution Policy**") and will consider appeals made using the process detailed below.

Careful consideration must be given to the correct application of appeals and the timing. The appeals process can only be invoked **after** a decision has been taken or a vote on a decision has been finalised in accordance with the Constitution Policy..

Any use of minority safeguards, as per the Constitution Policy, is separate and distinct from the Appeals Process and must be exercised **prior** to a vote or decision and cannot come after this time. Refer to the Constitution Policy for a detailed guide on the Safeguards process. Should there be any doubt as to which process and policy is appropriate, please refer to CIGB General Counsel in the first instance for guidance.

The appeals process cannot be used to prevent a CIMS remedy from being adopted, it can only be used in regard to the implementation approach to remedies. Where an appeal is received with regards to the implementation of a CIMS industry-led remedy, it will likely be shared with the FCA, allowing for confidentiality considerations. The FCA must be consulted should the CIGB consider it is not appropriate to adopt a CIMS remedy in its entirety.

Appeals Process

An appeal must be raised within 30 working days of a decision being published by the CIGB. The appeal can be raised by an individual firm or a cohort(s).

1. An appeals form (available on the CIGB website and upon request to the CIGB General Counsel) will be completed by the subscriber/cohort(s) group detailing the decision they are concerned with and why, including any initial evidence the stakeholder wishes to put forward at this early stage.

2. The Secretariat reviews the appeal and must evaluate its merits within 30 working days from receipt, if no grounds for appeal are found the secretariat must respond in writing to the appellant setting out their reasoning.

3. These grounds will vary on a case-by-case basis and the Secretariat will engage with CIGB's legal advisors as well as other parties as appropriate, (such as regulators), to determine and evaluate these, but grounds will include, without limitation, those identified above in the Introduction to this policy.

4. Whilst the appeal is being evaluated, all progress on the CIGB decision will be halted and this will be communicated to all CIGB subscribers and participants. For example, work will pause on implementing a CIMS remedy if an appeal is received. In cases where the CIGB receives an appeal related to a CIMS industry-led remedy, the FCA will be notified, allowing for confidentiality considerations.

5. If grounds for appeal are found, the Board must review their decision. This will include revisiting analysis/evidence utilised in coming to the decision, discussing with Advisory Councils to assess if evidence can be supplemented and may involve further stakeholder consultation. Alternative implementation approaches to the decision may also be re-evaluated. The appellant will have the right of representation to raise their own evidence to the Board.

6. Upon further evaluation, the Board will re-vote on the decision. The results of this process would be shared with the appellant within 90 working days (information relating to these appeals and decisions may be published by the CIGB, having regard for confidentiality and sensitivity).

7. Depending on the result of this vote and the topic at hand, the decision or policy process may be restarted, potentially involving rescoping solutions and involving Advisory Councils.

8. If the appellant is not satisfied with the outcome, they may contact their relevant regulator as they see fit to seek to influence CIGB and/or seek recourse through the jurisdictional courts.

The CIGB follows a transparent protocol around the decision-making process, which is detailed in the Constitution Policy. Schedules of all Board meetings will be published in advance, subject to quarterly review, accounting for Directors' availability.

Emergency Board meetings can be scheduled outside the published annual Board meetings in exceptional circumstances and with the approval of the Chair.

The upkeep of CIGB's action log is carried out by the Secretariat, distilled into Board agendas and circulated in advance. Actions can be standing, reflecting the CIGB's annual project plan and/or be added to by Directors or Advisory Councils as needed. Actions will be supported by appropriate documentation where needed, for example including CBAs, legal advice, evaluations produced by CIGB staff and/or inputs from Advisory Councils. Actions will be classified into ordinary vs special procedure decisions.

There shall be clear instructions for the tabling of decisions for voting, both at Board meetings and via email/in writing.

Appeal Form Details

Appellant Name	
Appellant Contact Email	
Appellant Contact Number	
Decision to be Appealed	
Date Decision was Taken	
Date Appeal Received	
Grounds for appeal	
Additional Evidence or Further Analysis Submitted	
Revote	
Conclusion	
Conclusion Commentary or Supporting Evidence	