

Treating Customers Fairly (TCF) Policy

Requirements

We are aware of the FCA's drive to encourage firms to implement a TCF strategy in line with FCA Principle 6 which states that:

“A firm must pay due regard to the interests of its customers and treat them fairly.”

We will address this requirement through the implementation of the following TCF Policy.

Gap Analysis

We will undertake a TCF gap analyses to identify potential weaknesses in the firm's TCF strategy. The analysis will look at each of the TCF 6 Consumer Outcomes and will analyse what we are doing, and importantly what we may not be doing, that impacts on each outcome. Progress towards addressing gaps will be reviewed periodically. The TCF Gap Analysis will complement the annual compliance audit report.

Correspondence with Customers

Our aim is to provide fair and clear customer communication at all times. Customer documentation will be reviewed on an ongoing basis to ensure the highest standards are attained.

Training

We aim to ensure that all staff training needs are routinely assessed and that suitable and relevant training is implemented. Where appropriate, staff will seek qualifications to both maintain minimum industry requirements and to enhance the professional standing of the firm.

Governance

We will maintain adequate systems and controls appropriate to the needs of the business and put in place a management team with the requisite skills, knowledge and experience to ensure excellent corporate governance.

Monitoring & Supervision

Staff will be routinely and periodically monitored both internally and externally through contracted out-sourcing of specific duties such as compliance audits. Monitoring will be relevant to the nature of the firm's business and appropriate to staff roles and duties, but will always consist of file auditing and monitoring of key performance indicators.

Management Information (MI) / Key Performance Indicators (KPI)

We will produce regular MI and KPI, appropriate to the scope of the firm's activities. These will be reviewed with issues being fully followed through to an appropriate conclusion.

Research

All products and providers that we recommend will be thoroughly researched prior to our recommending them to customers. Where appropriate due diligence will be undertaken.

Complaints

We will investigate all complaints made against the firm in an objective and fair manner. Should we identify issues where blame can be attached to the firm, we will aim to ensure that customers are not disadvantaged as a result of any actions that the firm may have previously undertaken.

Record Keeping

We will maintain good quality records and maintain such records securely.

Data Security

We will have due regard to the sensitive nature of customer records, ensuring at all times that information is only disclosed to third parties as necessary for transacting business on behalf of customers.

Customer Feedback

We shall actively seek feedback from customers to gauge customer satisfaction and to seek ways of continually improving standards.

Operational Risks

We will continually monitor risks that may affect the firm's ability to deliver a professional service to customers and will implement a business continuity programme to ensure that the business can continue in the event of a disaster situation and so that customers' interests are at all times protected.