

2018

## Treating Customers Fairly Statement



We are committed to ensuring that our clients and staff are treated fairly at all times. We aim to ensure our service is always to a high standard and where errors occur – we look to learn from them. The following statements are our commitments to how we achieve this.

### **Risk Assessment**

- NW Brown is committed to adhering to the rules and principles of the Financial Conduct Authority and other relevant legislation and has close links with its clients.
- Complaint levels are low with no unresolved claims in recent years.
- Administration and record keeping systems are of a high standard and are reviewed on a periodic basis.
- All staff and adviser competence is regularly monitored through our T&C programme appropriate to the role.
- We review how we treat individual clients - particularly in relation to issues arising from complaints or other evidence of any misunderstanding regarding the firm's services, systems and advice process. We also undertake periodic surveys of customer opinion on service levels.

All of the above embody the principles of TCF and this is why we assess the firm's TCF risks as low.

### **Communications - Financial Promotions & Sustainability**

- NW Brown maintains internal procedures to ensure that all promotions to clients are clear, fair and not misleading.
- NW Brown always seek to make suitability letters and reports as easy to understand as possible to appropriately explain benefits, risks and potential downsides of any recommendations.

### **Advice Process**

- NW Brown will endeavour to provide appropriate advice and takes full account of the client's circumstances, needs, attitude to and understanding of risk.
- When assessing the client's attitude to risk, NW Brown will, through close examination and discussion, ensure that both sides clearly understand what risk means to the client - in the client's terms.
- NW Brown is committed to undertaking a comprehensive and effective information gathering exercise with its clients in order to gain a better understanding of their requirements.
- NW Brown is committed to carrying out full and periodic review meetings with all clients - ensuring relevant details around the client's circumstances, income, expenditure, affordability, needs and wants - both now and in the future are recorded.
- NW Brown is committed to putting appropriate options to the client and will allow the client to reject them without pressure to proceed.
- By building and maintaining appropriate detail around the client's circumstances, NW Brown will endeavour to make clients aware of areas of planning they may not have considered and will suggest a plan of action for achieving these aims.
- NW Brown seeks to provide the client with sufficient information, allowing them to make an informed decision. This information will be balanced and will cover appropriate risks, exclusions and charges.

## **Disclosure and Paying for our Services**

- NW Brown is committed to ensuring that the client fully understands who they are dealing with and how they will pay for our services.
- NW Brown will always agree the most appropriate payment method in advance of beginning any work.
- Where a client agrees to pay us a fee, this can be offset in whole or in part by any commission we receive.
- We will maintain appropriate records regarding invoices to clients and client monies.

The Financial Conduct Authority have referred to six "consumer outcomes" as being the test of a firm's ability to treat clients fairly. We believe that our daily actions in following these commitments fully addresses those tests as stated in appendix "A" below.

## **APPENDIX A**

Financial Conduct Authority expected TCF Consumer Outcomes

### **Outcome 1**

Consumers can be confident that they are dealing with firms where the fair treatment of customers is central to the corporate culture.

### **Outcome 2**

Products and services marketed and sold in the retail market are designed to meet the needs of identified consumer groups and are targeted accordingly.

### **Outcome 3**

Consumers are provided with clear information and are kept appropriately informed before, during and after the point of sale.

### **Outcome 4**

Where consumers receive advice, the advice is suitable and takes account of their circumstances.

### **Outcome 5**

Consumers are provided with products that perform as firms have led them to expect and the associated service is both of an acceptable standard and as they have been led to expect.

### **Outcome 6**

Consumers do not face unreasonable post-sale barriers imposed by firms to change products, switch provider, submit a claim or make a complaint.

**For more information, please contact us on 01223 720 233.**