



Treating Customers Fairly (TCF) Policy

Version 2.0 Draft

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Document Control

Document History

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V2.0	20/5/2021	Draft	Policy Review

Document Approval and Ownership

Name	Title	Approval	Date
Sam Bower	Compliance Manager	Rich Swann	20/05/2021
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1. Introduction

Treating customers fairly (TCF) remains central to the FCA expectations of any firms' conduct when dealing with consumers of financial services. The well-being of customers should be priority for all firms regardless of their size. The culture within a firm is of high importance where TCF is concerned meaning that the tone from the top is paramount in achieving fair outcomes for customers.

The FCA has set 6 TCF outcomes:

- **Outcome 1:** Consumers can be confident 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 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 product, switch provider, submit a claim or make a complaint.

Purpose

This document sets out the Treating Customers Fairly (TCF) Policy of UK Debt Advisors Ltd. UK Debt Advisors Ltd (UKDA) are fully committed to TCF and our policy underpins the day to day running of our business.

UKDA aims to deliver the following:

- Effective leadership which sets TCF as central to the firm's culture
- Ensuring recruitment and remuneration enforce the TCF message
- Measurement of appropriate performance and service standards throughout the firm
- Ensuring complaints are properly and fairly handled
- Ensuring customer communications are clear fair and not misleading

Scope

The scope of this policy will apply to all employees.

2. Advice

When providing advice, Advisers are required to carry out a thorough fact find to enable them to understand our customers personal and financial circumstances ensuring that the advice provided is suitable.

Customers are provided with sufficient information about the features, benefits, costs, and risks of available debt solutions to enable them to make an informed decision.

2. On Going Information and Support

Where referrals are made to third party, advisers strive to ensure customers are kept up to date and remained informed on the progress of their case when referrals are made to debt solution providers.

Any issues identified are escalated on behalf of the customer and feedback is provided to the debt solution provider where appropriate.

3. Management Information (MI)

UKDA undertakes monthly Quality Assurance audits for all Advisers to ensure that advice provided is suitable and customers have been treated fairly throughout the advice process.

Weekly compliance meetings take place to discuss any trends identified and any complaints received. Any other matters relating to TCF are discussed at the monthly compliance meeting.

3. Awareness/Training

UKDA ensures that all staff are familiar with the TCF principles. An online TCF training and assessment is completed by all staff on an annual basis.

All Advisers are trained on debt solutions to provide them with the skills and knowledge to provide suitable advice to our customers.



4. Complaints

All complaints are dealt with in line with the Complaints procedure taking account of the FCA Complaint Handling rules. All Complaints are logged on the Complaints log and any escalated complaints are investigated impartially, fairly, and promptly by the Compliance Manager. Complaints MI is regularly reviewed as above, and root cause analysis is undertaken if there is any impact on TCF.

5. Remuneration

Any remuneration schemes are designed to prevent any sales bias so that this mitigates the risk of poor customer outcomes. Any new schemes need to be signed off by Compliance before implementation.

6. Additional Policies

UKDA has several other policies and procedures which are relevant to TCF, for example:

Complaints Policy

This is not an exhaustive list.