



## INSIGHT REPORT LTD (IRL)

### **Our commitment to Treating Customers Fairly (TCF)**

We are committed to supporting the Financial Conduct Authority's principle that a firm 'must pay due regard to the interests of its customer and treat them fairly'.

#### **Our TCF mission statement**

We will act with integrity in everything that we do, seeking to achieve maximum benefit for people and planet, whilst treating our customers fairly and with respect.

The outcomes we are working to achieve include:

#### **Outcome 1**

Consumers can be confident that they are dealing with a firm 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 what our firm has 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.

## **Our TCF Principles**

Customers will be provided with clear information and kept appropriately informed before, during and after the point of sale.

Our level of service and product performance will meet or exceed the expectations of our customers as far as reasonably possible.

We will ensure that there is no barrier for customers to express their requests, concerns or complaints, and will always be responsive to them, in accordance with our procedures.

Products and services will be designed to meet the needs of customers.

## **Implementing and Assessing our TCF principles**

### **Marketing**

All IRL's financial promotions and marketing literature are reviewed to ensure that they are appropriate for the target audience and are presented in a clear, fair and not misleading manner. We aim to adopt the Crystal Mark for clarity in our literature.

### **Post-sale information and support**

IRL strives to keep its customers informed at all times. Appropriate records are provided as required and on an ongoing basis. We have appropriate capacity

and processing arrangements in place to ensure continuous support and no post-sale barriers.

### **Policies and Procedures**

IRL has a number of policies and procedures that are relevant to the fair treatment of clients and also achieve adherence to FCA requirements, these include:

Data Protection Policy

Complaint Handling Procedure

Compliance Manual

Customer Feedback and Management information (MI)

IRL will use MI in order to assess its performance against TCF principles. We will ensure that MI is accurate, timely, consistent and relevant in order to assist the business in making informed decisions in the best interests of our customers. We ask our clients to provide us feedback, sometimes formally through customer surveys, so that we can improve our services. The information we collate from our clients can be reflected in company MI and reviewed by senior managers, directors and board members to help shape our strategic decisions.

### **Awareness/training**

IRL ensures that all staff are familiar with the fundamental principles of TCF. In addition, where applicable, staff will be trained in order to efficiently explain and provide our products and services. We will ensure that all our staff achieve the necessary qualifications and training in order to carry out their job functions with the required competence level. We will undertake regular monitoring and assessment of our advisers and staff so that we can be certain of their competence.

## **Compliance**

IRL has a compliance officer who is independent and will regularly monitor all key areas of regulatory compliance including TCF.

## **Remuneration**

IRL operates a remuneration model that prevents a negative impact on the treatment of its customers.

## **Complaints**

IRL aims to provide excellent customer service, and complaint handling is a major component of its TCF measures. We will deal with customer complaints fairly, objectively and in accordance with the rules laid down by the FCA. All complaints will be recorded and monitored by our compliance officer, and reported and analysed in company MI and Advisory Board meetings.

## **Vulnerable and Customers in Financial Difficulties**

Where we identify vulnerable and customers in financial difficulties through:

- a. consecutively failing to meet minimum repayments in relation to a credit card or store card;
- b. adverse accurate entries on a credit file, which are not in dispute
- c. outstanding county court judgments for non-payment of debt
- d. inability to meet repayments out of disposable income or at all, for example, where there is evidence of non-payment of essential bills (such as utility bills), the customer having to borrow further to repay existing debts, or the customer only being able to meet repayments of debts by the disposal of assets or security;
- e. consecutively failing to meet repayments when due;
- f. agreement to a debt management plan or other debt solution;
- g. evidence of discussions with a firm (including a not-for-profit debt advice body) with a view to entering into a debt management plan or other debt solution or to seeking debt counselling

- h. evidence through discussions of mental health issues and potential vulnerability

We will take appropriate steps to reflect this on their report with a view to preventing over-indebtedness. Where required we will sign-post the customer to social support or debt management organisations as appropriate.

## **Review**

We will frequently review our policies, procedures and practices to ensure that TCF remains a central part of our business.