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# DMS TCF POLICY

## What is Treating Customers Fairly all about ?

It's about putting Customers first, making sure that we take their needs into account in every aspect of our business and treating the Customer as we would want to be treated ourselves.

We remember that we have two types of Customer – Advisers and Clients. Clients come from all walks of life, but only Advisers work in Financial Services. We must remember this when we communicate with Clients, with whom we must avoid jargon.

## Who are our Customers ?

We accept business only from Advisers (persons or firms) directly authorised by the FSA for non investment insurance, or Appointed Representatives of directly authorised Principals who confirm to us that they accept compliance responsibility for their Appointed Representatives, and authorise us to deal with them on that basis.

All the insurance policies that we process originate from one of three sources:

- advised sales by Advisers
- non-advised sales coming directly from Advisers' websites.
- non advised sales coming from one of our websites.

Whilst we are more than willing to explain in detail to Clients how our policies work, and what they do and do not cover, we never advise on the suitability of our policies for Clients because this is the province of an Independent Financial Adviser (IFA). If a Client needs advice of this nature, and does not already have contact with an IFA, we will supply contact details of several in their area.

## What do we do to ensure we comply with TCF ?

We confirm all verbal Client contact in writing, using everyday English as far as possible, and not "insurance speak", and e-mail copies to Advisers. We take verbal instructions from Clients and Advisers, and then confirm these back to the Client by letter, e-mailing a copy to the Adviser, always allowing a 30 day cooling off period, not just at the time of purchase.

We have also inserted into all of our policy terms and conditions confirmation that if ever actions of ours that Clients have not authorised cause Clients to suffer losses, or penalty charges from their banks, DMS will cover these costs.

## TCF is prioritised every day, and is everyone's responsibility

Clients of DMS can be confident that they are dealing with a firm where the fair treatment of Customers is central to the corporate culture. Members of DMS consider the fair treatment of Customers in all that they do. Everyone is encouraged to get involved, challenge decisions and suggest improvements where appropriate. We constantly seek to improve the quality of the DMS offering, both in terms of the products and services offered, and in the efficiency of their delivery. Our systems are the subject of continuous improvement. Everyone in DMS knows that Treating Customers Fairly is their responsibility, every day.

## Annual Review of DMS TCF Policy

Annually we conduct a comprehensive review of the whole compass of our business.

## Regular Review of DMS TCF Policy

We keep up to date with regulatory requirements by monitoring industry publications, reading everything sent to us by the FSA, and act immediately on all suggestions received from our Compliance Consultant. All Customer feedback is noted and action on it initiated.

We ensure that products and services marketed by us and sold in the retail market are designed to meet the needs of identified consumer groups and are targeted accordingly. We do this by regularly consulting with Advisers who deal with us. This also empowers us to make certain that the products and services we offer meet the needs of both our Customers and our Clients.

## Impartial handling of Complaints

We have a robust complaints procedure in place, and because we are a small firm, and it would not be fair for us to be investigating ourselves, we have an agreement with UK Underwriting Ltd, under which we refer all complaints about DMS and its actions to them, they investigate these, and we have agreed upfront to accept their findings and recommendations, and be bound by them.

If a complaint is made and we immediately see that we have been at fault, or failed to offer the standard of service our Customer had the right to expect of us, or if UK Underwriting Ltd after their investigation uphold the customer's complaint, we immediately:

- admit the fault
- apologise for it
- mitigate any Customer losses
- repay any costs the Customer has incurred because of us
- make certain we learn from our mistake, if necessary updating our systems so as to prevent this happening again

## Annual Policy Review

We have a detailed annual review process in place so that our Customers are contacted to see if there has been any change in their circumstances.

## Dealing directly with Clients

When Clients contact us to notify a change in their circumstances, we ensure that they are offered our best deal, or a range of options from which to choose. If we are approached directly by a Client for information on our policies, we provide full information, taking particular care to explain:

- the Initial Exclusion Period
- Exclusions & Amendments
- Pre-Existing Conditions
- the Cooling off period
- that all applications are subject to underwriting
- that if we are not prepared to offer exactly standard terms and conditions, any variance to these will be brought to the Client's attention and explained
- whilst we can give information on our policies, we are unable to advise on their suitability for any Client. If the Client is not confident in their own ability to assess this, we suggest a referral to an IFA

We ensure that Clients are provided with clear information and are kept appropriately informed before, during, and after, the point of sale. We give them clear information about products and services before, during and after the sale, using jargon free communications that clearly set out what is being offered.

We regularly check that the quality of the information we give to Clients is the best that we can offer, not just that our process has been followed, also checking this against our competitors.

We assume every Client contact is a mystery shopper, and react accordingly.

We ensure that our products perform as our Clients have been led to expect, and the associated service is of a high standard as we have promised

## Dealing with Advisers

If an Adviser sale appears to offer a more expensive solution than is necessary, we bring this to the Adviser's attention before issuing the policy documentation

If our Underwriting decision is that we are not prepared to offer exactly our standard terms and conditions to their Client, we write to them setting out exactly what we are prepared to offer, and ask them to seek instructions from their Client before we proceed further.

Advisers are informed we are more than willing to explain the detail of any of our policies to Clients, but not to comment on the suitability of the policy to them.

## Dealing with Customers – both Advisers and Clients

We aim always to under promise to our Customers, and then over deliver.

We keep Customers informed of product performance post sale, and of opportunities to act when circumstances change.

## Information collection for future use in improving further

Customer feedback is actively sought and we act on it.

We regularly seek feedback from our Claims Managers on why claims have not been paid, to understand what the reasons are.

We check Advisers understand our products, and constantly offer telephone training on them. We issue regular Agency Bulletins to keep Advisers up to date on our products and services, and at all times our Agency Website holds full up to date information on our product range.

We ensure Customers do not face unreasonable post-sale barriers when they wish to cancel policies, change product, submit a claim, or make a complaint.

We ensure our Customers understand any restrictions on products and claims processes and are clear about our claims procedures.

We make certain always that both our explanation, and our policy documentation always makes clear what the Client can or cannot claim for.

We issue this Policy statement about how we ensure the fair treatment of our Customers immediately following our first contact with them.

We constantly ask ourselves "How much more can we do for our Customer, not how little can we get away with."