



Fresh Start UK Debt Management Limited

# TCF Policy and Customer Charter

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# 1 POLICY STATEMENT

Fresh Start UK Debt Management Limited (*hereafter referred to as The “Company”*) is committed to Treating Customers Fairly (TCF) in line with the FCA’s guidance on fair outcomes for consumers. Namely we strive to ensure that:

- **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

# 2 PURPOSE

The purpose of this policy is to provide a clear understanding of and guidance on, how we as The Company aim to put treating customers fairly at the forefront of our business. Our TCF approach helps to ensure we maintain a fair and transparent approach to our compliance standards throughout the business.

As a service provider in the debt management sector, our clients are considered vulnerable from outset and as such, we strive even more so to ensure all outcomes of TCF are at the forefront of our Customer delivery.

# 3 SCOPE

The policy relates to all colleagues (meaning all staff and employees, whether permanent, fixed-term, or temporary and any third-party representatives or sub-contractors, agency workers, volunteers, interns and agents engaged with the Company in the UK or overseas) within the organisation and has been created to ensure that Colleagues deal with the area that this policy relates to in accordance with legal, regulatory, contractual, and business expectations and requirements.

# 4 AREAS OF CRITICALITY

The Company puts the fair treatment of customers at the heart of its business. The Financial Conduct Authorities’ (FCA) Principles (PRIN) include both explicit and implicit guidance on the fair treatment

of customers. Principle 6 says: 'A firm must pay due regard to the interests of its customers and treat them fairly', but other principles also apply to this area of business behaviour. As such The Company works towards building a culture of fair customer treatment, using as best practice the FCA's six areas of good management behaviour:

- **Leadership:** all managers in The Company make clear in their practices and communication that the fair treatment of customers is fundamental to the firm's operation. All other customer-facing colleagues are subject to TCF training as part of mandatory CPD. This enhances a top-down commitment to TCF.
- **Strategy:** The Company has a clear vision for the fair treatment of customers 'Ensuring customers are at the heart of our services'. This vision is translated into the mission, vision and values of the entire business. Strategic decisions – such as change management and outsourcing – reflect the centrality of customers to the firm's future. Risk levels reflect customer concerns and feedback.
- **Decision-making:** at all levels, decisions reflect the fair treatment of customers. Feedback from colleagues customers and other external sources will be used, where appropriate. This management information is fed back into properly balancing customers' interests against shareholders.
- **Recruitment, training and competence:** The Company ensures that all colleagues are fit and proper to perform their duties. TCF is at the forefront of KPI's and remuneration strategies.
- **Reward:** The firm's reward structures (such as incentives and bonuses) is committed to being transparent, recognising good quality and supporting the fair treatment of customers.
- **Controls:** Management information is in place to monitor the fair treatment of customers.

We track the above using Management information (MI) as well as recorded Continuous Professional Development (CPD) in order to ensure all colleagues across the business understand their commitments to TCF.

## 5 MANAGEMENT INFORMATION

Management Information is vital for us in analysing trends and assisting in identifying and solving any problems which are identified. Common types of MI we use to ensure we address the areas of criticality and promote a culture of TCF include:

- Training and competence
- Customer feedback
- QA and audit
- Client demographics
- Terminations and attrition
- Growth and new business

A TCF Dashboard is produced monthly which summarises performance against relevant agreed TCF outcome metrics. This is reviewed at Management and Board. Please refer to Appendix 1 for further details

These are then used to monitor and measure our achievement of the 6 customer outcomes, both at a management and board level. All MI produced will always meet the following criteria:

- **Accuracy** – the correct numbers with any commentary will always be contributed by the right people with accuracy.
- **Time Adjacent** – the MI will be available sufficiently quickly after the relevant business activity to enable managers to act.
- **Relevant** – MI will be handled by those with the correct responsibilities to ensure a manager can take direct action on its findings or escalate to someone who can take the necessary action.
- **Consistent** – MI will remain consistent on a period-to-period basis to allow managers to spot trends and make sound decisions.

## 6 CHARTER

The Company ensures that clients are aware that their financial and personal wellbeing is at the forefront of our priorities. As such our charter below sets our public commitments to our clients in line with our TCF Policy above.

### **As part of our commitment to treating customers fairly we promise:**

- To continually act in a client's best interests.
- To offer debt advice that is fair and transparent and relevant to your specific individual circumstances.
- To give you sufficient accurate information to make an informed choice about your chosen debt solution.
- To make you aware of other services available and relevant to you including but not limited to the Money Advice Service, a free and impartial service set up by the government that is provided by the Money & Pensions Service.
- To continue to comply with all applicable law and codes of conduct laid down by regulatory authorities.
- To use your personal information as set out in our Privacy Policy and our Cookie Policy and to protect your data in line with the Data Protection Act of 2018.
- To keep you informed of the outcome of negotiations with your creditors and of any significant developments thereafter where a plan has been agreed.
- To comply with the FCA Consumer Credit Sourcebook and the FCA Handbook more generally where it relates to the regulated activities of a debt management firm.
- To return copy documentation to you at the end of your plan, if requested. Original documentation will have been scanned and returned during the course of the plan.
- To deal with any complaint in accordance with our complaints policy, which is available at <https://www.freshstartltd.com/complaints-procedure>

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*END*

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