



Treating customers fairly policy

Introduction

The Financial Conduct Authority's (FCA) Treating Customers Fairly (TCF) Principle 6 requires a firm to pay due regard to the interests of its clients and treat them fairly. We are fully committed to TCF and this Policy has been designed to demonstrate the application of TCF during our day to day activities.

TCF is embedded throughout the FCA's Handbook and the FCA's six core consumer outcomes are embedded in our firm. These are:

- Consumers can be confident they are dealing with firms where TCF is central to the corporate culture.
- Products and services marketed and sold in the retail market are designed to meet the needs of identified consumer groups and targeted accordingly.
- Consumers are provided with clear information and are kept appropriately informed before, during and after the point of sale.
- Where consumers receive advice, the advice is suitable and takes account of their circumstances.
- 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.
- 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 Mission Statement

We will act with integrity in everything we do and put our customers at the heart of our business.



Our TCF Principles

- Customers will be provided with clear information and kept appropriately informed before, during and after the point of sale.
- If we give advice to our customers, the advice will be suitable and take account of their circumstances.
- Our level of service and product performance will meet 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.
- Products and services will be designed to meet the needs of our customers.

Assessing and implementing our TCF Principles

Marketing

All our financial promotions and marketing materials are reviewed to ensure that they are appropriate for our target audience and are presented in a clear, fair and not misleading manner.

Sales, Advice, Management

When providing advice, our advisers obtain a detailed understanding of the customer's needs so that our recommendations are suitable. We ensure that our customers understand the risks involved with any service or product offered and are aware of all fees and charges.

Post-Sale Information and Support

We strive to keep our customers informed pre, during and post contract. Appropriate records are held and can be provided as required on an ongoing basis. We have appropriate capacity for storing



and processing information to ensure continuous support. We have no post-sale barriers in place which restrict customers' access.

Policies and Procedures

We have policies and procedures that are relevant to the fair treatment of our customers and which also meet FCA requirements. These are (this not an exhaustive list):

- Conflicts of Interest Policy
- Data Protection Policy
- Vulnerable Customers Policy
- Training and Competence Policy
- Financial Crime including Bribery & Corruption & Money Laundering
- Complaint Handling Procedures
- Financial Promotions Procedures

Management Information (MI)

We produce MI to assess our performance against the TCF principles. We ensure that MI is accurate, timely, consistent and relevant to assist the business to make informed decisions in the best interests of our customers. We produce MI reports which are reviewed regularly by senior managers, directors and board members in various meetings.

Awareness/Training

We ensure that all advisers and staff are familiar with the TCF Principle and its outcomes. In addition, where applicable, advisers and staff are trained to advise on and adequately explain our products and services. We make sure that all advisers and staff achieve the necessary qualifications and training to carry out their role to the required competence level. We undertake regular monitoring and assessment of our advisers and staff so that we can ensure their competence.



Compliance

We maintain a Compliance Monitoring Programme which clearly lists areas of responsibilities and the frequency of checks required.

We have a compliance team who is independent and regularly monitors all key areas of regulatory compliance including TCF.

Every year we carry out a TCF Self-Assessment to measure our performance and which highlights areas of improvement

Remuneration

We operate a remuneration model that does not reward on sales performance only, to mitigate sales bias. We reward non-sales staff in a which does not negatively impact on the treatment of our customers. All staff contribute to the firm's overall target. The sale of finance is not incentivised.

Complaints

Our goal is to provide excellent customer service and complaint handling plays a major part in our TCF policy. We deal with customer complaints fairly and objectively and attempt to put things right as quickly as possible, in accordance with the requirements of the FCA Dispute & Resolution Handbook. All complaints are recorded and monitored, and a root cause analysis performed. All are reported as MI and analysed in senior management meetings.

Conclusion

We encourage a culture of personal responsibility and impress upon all involved with our firm that a good culture is central to the economic health of our firm. We strive to build a strong conduct culture which builds both customer trust and inspires employees. Getting the culture and conduct right is in the interests of our economic strength and our shareholders.

We frequently review our policies, procedures and practices to ensure that TCF remains central to our firm.



We ask our clients to provide us feedback, sometimes formally through customer surveys, so which enables us to improve our service. The information we gather from our customers is reported in our MI and reviewed by senior managers, directors and board members to help shape any strategic decisions.

COMPLAINTS PROCEDURE

Your views are important to us and if we do not deliver to the high standard of service you should expect, or if we make a mistake, we want to know. We will investigate your complaint and try to resolve the problem as quickly as possible.

How we handle complaints

Step 1

Please contact us at your earliest convenience with the following information:

- Your full name, address and telephone number
- Details of any previous correspondence you've had with us
- Details of your problem or complaint
- We will try to give you an answer there and then, but if this is not possible, we will take full details from you and arrange for the problem to be investigated.

You can contact us in one of the following ways:

In writing: 290 Chorley New Road, Horwich, Bolton, BL6 5NY

By phone: 01204 690957

By email: Info@mr-group.co.uk

Step 2

We will try to resolve your complaint straight away. However, if it requires a more in-depth investigation, then we will aim to give you our final response within four weeks. If for whatever reason this is not possible, we will contact you to explain the reasons why and let you know how long our investigations are likely to take.

Step 3



We hope that you'll never have to do this, but if you're not happy with the way we've handled your complaint, the outcome of it, or if eight weeks have passed and we have not sent you our final response, you may have the right to refer your case to the Financial Ombudsman Service.

You can contact them in one of the following ways:

In writing:

The Financial Ombudsman Service
Exchange Tower
London
E14 9SR

By phone: **0800 023 4567**

By email: complaint.info@financial-ombudsman.org.uk

Website: <http://www.financial-ombudsman.org.uk>(external link)

Please remember that you will need to refer your complaint to the Financial Ombudsman Service within six months of receiving our final response.

If you have bought your insurance online, you can also register your complaint with the **Online Dispute Resolution**(external link) website, which has been set up by the European Commission.

Privacy Policy

Who are we?

We are **M&R Plumbing & Heating Ltd** and can be contacted on the below contact details:

- Email: Info@mr-group.co.uk
- Telephone: 01204 690957
- Address: 290 Chorley New Road, Horwich, Bolton, BL6 5NY

Our Data Protection Officer

Our data protection officer can be contacted on the below:

- Lindsay Carr
- Email: Lindsay@mr-group.co.uk
- Telephone: 01204 690957
- Address: 290 Chorley New Road, Horwich, Bolton, BL6 5NY

Why do we collect and use your personal information?



We collect and use your personal information in order for us to provide you with our **Plumbing/ Heating/ Boiler repair and installation** service.

We use your personal information to send marketing communications to you about similar products and services that may be of interest to you. We will send our marketing communications to you by email. It is to be noted that you can object to your personal information being used by us to send you marketing information. Each marketing email will also include an unsubscribe link to enable you to opt-out of receiving future marketing communications.

What is our lawful basis for handling your personal information?

Under the General Data Protection Regulation (GDPR) we must have a lawful basis to legally handle your personal information. The lawful basis that we rely upon are as follows:

1. Contract – to take steps, at your request, to enter into a contract to fulfil your order and to perform our obligation under the contract (i.e. to deliver your order);
2. Legal obligation – to share personal information with law enforcement agencies and regulatory bodies if required to do so by law;
3. Legitimate interests – to use your personal information to send you marketing communications about similar products/services in the future, to share your personal information with third party professional service providers that we engage and to share your personal information with our successor(s) in the event of a merger or acquisition.

What happens if I do not provide my personal information?

We need your personal information in order to provide our **Plumbing/ Heating/ Boiler repair and installation** services to you. If we do not collect your personal information, we will not be able to provide our services to you.

Who will we share your personal information with?

We will share your personal information with **Hitachi Capital UK Plc**

We may share your personal information with law enforcement agencies, fraud prevention agencies and regulatory bodies such as the FCA and HMRC when required to do so by law.

We may engage the services of professional advisers such as compliance consultants, lawyers and accountants who may be given access to your personal information in order to provide their services to us. We will ensure that your personal information is protected by obtaining a written undertaking of confidentiality from the professional service providers.

In the event that we are subject to a merger or acquisition we may share your personal information with



the organisation(s) that acquire or merge with our business and/or their professional advisers in the course of the acquisition or merger transaction and thereafter. In such circumstances the latter organisation will be required to use your personal information in the same ways described in this privacy policy.

How long will we store your personal information?

We will store your personal information for up to six years from ceasing to be our client. This is to enable us to refer to our records in the unlikely event that you want to lodge a complaint against us within six years.

If you do not exercise your right to object to marketing or unsubscribe to our marketing emails, we will store your personal information for marketing purposes until you exercise your right to object or unsubscribe.

What are your rights in relation to your personal information?

Right to access

You have the right to request copies of the personal information we hold about you at any time.

Right to rectification

You have the right to request that we correct any inaccurate personal information we hold about you.

Right to erasure

You have the right to request that we delete your personal information from our records.

Please note that we will not be able to delete your personal information whilst we are still providing our services to you. We will be able to delete your personal information once you cancel the service or once the service is completed.

Right to restrict processing

You have the right to request that we restrict how we use your personal information.

Right to object

You have the right to object to the collection and use of your personal information at any time.

Right to data portability

You have the right to obtain a copy of your personal information in a legible and compatible format such as Excel or Word.

Right to withdraw consent

You have the right to withdraw your consent for us to use your personal information at any time.

How can I exercise my rights in relation to my personal information?

You can exercise all of your rights by contacting us on any of the above contact details.



How do I lodge a complaint about the use of my personal information?

You can lodge a complaint with us directly by contacting us on one of the above contact details.

You also have the right to lodge a complaint directly with the Information Commissioner's Office (ICO). The ICO are the regulator who makes sure that we use your personal information in a lawful way.

You can lodge a complaint with the ICO by following this link <https://ico.org.uk/concerns/> or calling the ICO on 0303 123 1113.

OUR PROCESS FOR DEALING WITH POTENTIALLY VULNERABLE CUSTOMERS

A person is unable to make a specific decision if he cannot understand information about the decision to be made, cannot retain that information in his mind, cannot use or weigh that information as part of the decision-making process, or cannot communicate his decision.

A person with mental health problems who is in debt is particularly vulnerable due to his (potential):

- Lack of money management skills
- A reliance on benefit income
- Fluctuations in income or inability to work
- Unmet housing, care or treatment needs
- Poor communication skills
- A relationship breakdown

Assessing a person's mental health is complex but needs to be recognised in early contact and addressed appropriately. If we believe a person may be vulnerable, we will ask 3 key questions:

- 1. Does your mental health affect your financial situations?**
- 2. Does it affect your ability to deal with or communicate with us?**
- 3. Does anyone help you to manage your finances such as a family member?**



Signs we look out for when identifying vulnerability in customers:

- Do they ask you to speak up or speak more slowly?
- Do they understand what you are saying, or do they miss important bits?
- Do they appear confused about what is being offered?
- Do they ask any unrelated questions?
- Do they keep wandering off the point in the discussion and talk about irrelevant things or things that don't make sense?
- Do they keep repeating themselves?
- Do they take a long time to answer questions or say that someone else deals with these things for them?
- Do they have a language barrier?
- Do they say they don't understand their bank statements, a previous phone conversation or recent written correspondence?

Steps we take if we believe a customer may be vulnerable:

- We speak slowly, clearly and explain fully
- We are patient and empathise where appropriate
- We don't rush as it may sometimes take the customer time to get relevant information together such as account details
- We keep on the subject under discussion
- We do not make assumptions about a customer's needs
- We clarify understanding at every point and always ask if there is anything else he would like us to explain
- We ask the consumer to explain to us what he understands the agreement to be
- We offer alternative types of communication – phone, post, email, in person
- We do not make assumptions that the person we are dealing with is sighted as he may be unable to read or understand serial numbers or account numbers



- We do not make assumptions that the customer we are talking to can hear everything we say as he may have a hearing impairment
- We always remember that the customer we are speaking to may sometimes be forgetful or overly trusting and believe that a sales representative is always acting in his best interest
- We understand that some customers may be lonely and welcome the opportunity just to talk to someone
- We give the customer time to explain his circumstances fully and don't interrupt or appear impatient
- We also listen for what is **NOT** being said, for example, lack of questions about price, lack of commitment, timing of responses, extended silences
- We always ask if there is a better time to discuss matters as some customers may perform better at different times of the day
- We ask if there is anyone else the customer may need to talk to before making the decision

Prior to forming the contract:

- We ensure that the consumer demonstrates that he has an understanding of the decision he needs to make, why he needs to make it and that he understands the consequences of making, or not making that decision.
- We ask if he needs to discuss the matter with anyone else, or if he would like us to explain anything else, or if there anything else we can do further to help
- We are always prepared to repeat anything to clarify understanding
- We do not assume that the customer fully understands all the implications of the agreement and explicitly and clearly confirm all the key features
- We suggest that he talks it through with someone else and offer to re-contact him. If appropriate we suggest that a third person could be present

Post Contract:

- If we identify particular communication needs, we store that information so future contacts are handled appropriately with his permission



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- We record that we are satisfied that the customer completely understood everything that was discussed
 - We allow customers to make a personal declaration about his capabilities or communication needs and store this information with his permission
 - Any records that are held are with the full knowledge and consent of the customer and are deleted when the relationship no longer exists in accordance with GDPR.

If we identify a customer who may be in need of specialist advice which we are unable to offer:

- We will refer him to, or we will seek guidance from an appropriate organisation such as:
Stepchange
Money Advice Trust
CAB
Samaritans
Age UK
Alzheimers Society
Mind

Sources of guidance we refer to:

Equality Act 2010

Mental Capacity Act 2005

CONC 2.10 Contact with customers

Mental Capacity Guidance

Irresponsible Lending Guidance



MALG Consumers with mental health problems & debt

MALG 12 steps to treating vulnerable consumers fairly

