



# Duty Policy & Client Charter

(web)

**We are committed to providing you with a highly personalised service with qualified and knowledgeable debt advisers**

Produced by the Compliance Unit

V1224



**This document is issued by the Compliance Department of:**

Clifford Watts Limited

Registered in Wales with no. 8204102 at 11 Coopers Yard, Curran Road, Cardiff CF10 5NB

Authorised and regulated by the Financial Conduct Authority (FRN 680745)

Data Protection Registration Number: Z3441312

# Duty Policy & Client Charter

## Our Duty Policy

The directors and associates of Clifford Watts Limited, trading as Your Debt Advice, are committed to ensuring that the [Financial Conduct Authority](#) (FCA) principle of delivering good outcomes for our customers is applied in all areas of our day-to-day business activities. As a small firm, we are committed to providing you with a highly personalised service with friendly, qualified and knowledgeable debt advisers.

In adopting the Consumer Duty Principle 12 and cross-cutting rules, we believe that delivering good customer outcomes is about adding value to the service we offer by aiming to:

- Assess with you the benefits and applicability of ‘breathing space’<sup>1</sup> schemes where available
- Meet, as best we can, your unique needs by offering a friendly, open and professional service. This takes account of nearly one third of our plans being with a couple seeking debt relief together, including their communication preferences
- Constantly review our service to identify areas for improvement and to maintain a high level of engagement with you around the on-going suitability and sustainability of your Debt Management Agreement with us. You are actively encouraged to identify areas of improvement
- Take account of your preferred methods and time of communicating with us and to accommodate these within our day-to-day practices wherever possible, recording any accessibility requirements or special needs that you choose to disclose
- Be especially mindful of the needs of customers that may need extra support

### We are committed to ensuring that we:

- Put our customers at the heart of our business and focus on delivering good outcomes throughout their relationship with Clifford Watts
- Provide high quality debt advice, high quality customer service
- Communicate and engage with our customers so that they can make effective, timely and properly informed decisions when in receipt of regulated advice
- Do not seek to exploit any behavioural biases, lack of knowledge or characteristics of vulnerability
- Monitor and regularly review the outcomes that you are experiencing, taking prompt action to address any risks to delivering good customer outcomes
- Continuously learn from our growing focus and awareness of real customer outcomes

There are many touchpoints with either an individual or couple in their DMP journey. Our aim is to be open and transparent in all our business practices, which can include situations where a customer doesn’t agree with our recommendations or doesn’t respond to important requests for contact or information.

We recognise that to fulfill this policy statement we must:

- Invest in the training and development of our managers and staff to ensure they remain competent and focused on the importance of treating every customer fairly and individually

<sup>1</sup> <https://www.moneyhelper.org.uk/en/money-troubles/dealing-with-debt/what-is-breathing-space-and-how-can-it-help-me>

## Duty Policy & Client Charter

- Monitor calls, digital communications and activities for training & quality purposes to ensure that any advice given to you is in your best interests. We will record where we make a recommendation and whether you accepted our recommendation as part of the on-going service
- Where a debt advice event occurs then we will issue a suitability statement/advice letter in writing (i.e. by letter or digitally)
- Continually assess the services we provide to you to ensure we can meet your changing requirements and that the advice we provide is suitable to your needs, record your objectives and preferences
- Provide up-to-date documentation in durable medium to clearly and unambiguously explain how our services operate
- Ensure any concerns raised by you or your creditors are promptly addressed by front-line staff as soon as is practical
- We will always try and address expressions of dis-satisfaction before they escalate into complaints in line with our 3-day summary response process and Complaint Policy
- We operate a robust and flexible Vulnerability Policy to consider any additional support needs that you may have and to look at how we need to tailor our service to address these needs

## Client Charter

Your financial and personal well-being is very important to us and we set very high standards of professional conduct to ensure that our clients get the best possible service. Our Client Charter sets out our commitment to you, including your rights to cancel at any time or to complain if you are dissatisfied with our service.

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

- To act in your best interests, offer all-round debt advice based upon your circumstances and be transparent and fair in all of our dealings with you. We will discuss the full range of debt solutions available to you, including the benefits and risks of each option, so that you can make an informed choice.
- To make you aware of [MoneyHelper](#), a free and impartial service set up by the government that is part of the [Money and Pensions Service](#).
- To make you aware that we comply with all applicable law.
- To use your personal information as set out in our [Privacy Policy](#) and our Cookie Policy.
- To ensure that our employees are fully trained to provide the service you expect and are able to identify potential vulnerability where this may require the processing of special category data, as set out by UK GDPR or legislation that may replace this through the lifetime of your plan.
- To comply with the FCA Consumer Duty, Consumer Credit Sourcebook and the FCA Handbook more generally where it relates to the regulated activities of a debt management firm. In particular, this will include providing an advice letter where any advice event occurs through the lifetime of the plan and undertaking regular reviews of the on-going suitability of the plan, which will involve an advised review at least once every 12 months from the anniversary of your debt management agreement. We will make all reasonable endeavours to maintain contact with you using the preferred contact method and contact times you have provided us with, which may change from time to time.

## Duty Policy & Client Charter

- To disclose on request, our business introducers, service partners or businesses with common controllers, including any commissions or fees payable to or from them. We will always seek your consent when any additional service is offered that is outside of the core purposes of the debt management service.
- To deal with any complaint in accordance with our complaints policy, which is available at <https://cliffordwatts.com/legal/complaints>. This includes access to independent redress through the [Financial Ombudsman Service](#).

### Clifford Watts Customer Experience Team