

# Consumer Duty Policy

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# 1 Purpose

This policy details how Progress Vehicle Management Ltd (the Firm) will manage our obligations to deliver good customer outcomes, treat customers fairly and ensure a consistency of approach within the Firm.

The Firm will meet our obligation to conduct ourselves ethically by properly managing any potential conflicts of interests.

Progress Vehicle Management Ltd is authorised by the Financial Conduct Authority (FCA) and, as such, will act in accordance with the Principles as defined in the FCA Handbook including Principle 12.

## 2 Review of Policy

This policy will be reviewed regularly, at least once a year, and amended as considered necessary by the Firm's Management Body in the event of changing circumstances or regulations.

## 3 Responsibilities

### 3.1 Management Body Responsibilities

The Management Body of the Firm is responsible for ensuring that good customer outcomes are achieved under the Consumer Duty for all retail customers and the content of this policy document is adhered to. This includes ensuring the culture of treating customers fairly is embedded within the Firm and is central to the Firm's practices.

Our firm's Management Body comprises of *our Directors and Senior Managers as follows:*

Brian Keating – Director

Chris Hill – Director

Gary Mason – Director

Sophie James – Compliance Manager

Ruth Davey – HR Manager

Karen Netto – Head of Claims

Sam Freeman – Claims Manager

Matthew Whitmarsh – Accounts Team

The firm have appointed Sophie James as the Consumer Duty Champion.

#### 3.1.1 Culture

Progress Vehicle Management Ltd takes its responsibilities towards customers seriously and as such has ensured that a culture of delivering good customer outcomes starts with the Management Body and is cascaded down through the Firm.

Good customer outcomes and the fair treatment of customers are central to the behaviour and values of our Firm and senior management are able to articulate what the Consumer Duty means for our Firm and communicate this to all employees. We deliver this through the three cross cutting rules and four outcomes set out within the Consumer Duty and the six TCF outcomes, alongside our obligations in relation to the Principles for Business and the Conduct Rules.

### 3.1.2 Strategy

When determining our strategy the Management Body has aligned our vision and values with delivering good customer outcomes at the forefront of the process.

Our strategy sets out our objectives and risk appetite to reflect a consistent approach to delivering good customer outcomes and allocating appropriate resources to ensure that actions that ensure fair treatment of customers agreed at the planning stage, are delivered.

## 3.2 Employee Responsibilities

All employees are expected to read, understand and accept any policies and procedures that relate to how the Firm expects customers to be treated in order to ensure they receive good outcomes.

All employees are expected to adhere to the Conduct Rules applicable to their roles, including the rule that states “You must act to deliver good outcomes for all customers”.

In order to achieve this, the firm will ensure all relevant staff have the required level of knowledge regarding the services we offer.

## 4 Defining a ‘good customer outcome’

Firm Name’s target market are categorised as post-accident Customers with the following common traits:

Our customers are all post motor accident customers, requiring assistance following an accident for different services i.e. vehicle repairs, vehicle replacement, personal injury etc. We accept all customers are susceptible to event driven vulnerabilities such as stress, financial loss.

The events that lead our customers to us, are not likely to have been experienced previously and may be seen to be experiencing distress, frustration and financial loss i.e. cannot work due to injuries or lack of vehicle.

As we do not provide the initial product and services and therefore are not involved in the price and value, our sole customer outcome is surrounding consumer understanding and consumer support. More on how we achieve these outcomes are listed further into the policy.

## 5 Cross Cutting Rules

Progress Vehicle Management Ltd recognises that delivering good customer outcomes will be achieved through adhering to the three cross-cutting rules of Consumer Duty which are to:

- Act in good faith towards customers;
- Avoid foreseeable harm to customers; and
- Enable and support customers to pursue their objectives.

## 6 Consumer Outcomes

Progress Vehicle Management Ltd cannot adhere to all four Consumer Duty Outcomes. We cannot adhere to outcome 1 and 2 as they do not apply to our Firm but can adhere to 3 and 4 which are:

### 1. Products and Services:

### 2. Pricing and Value:

### 3. Consumer Understanding:

We will ensure that we support our customers by helping them to make informed decisions about products and services. Customers will be given the information they need, at the right time and presented in a way that they can understand.

We will:

- Support our customer's understanding by making sure that our communications are likely to be understood by our "average" customer and are provided at the right time, so that they can make properly informed and timely decisions.
- Tailor communications, taking into account the characteristics of the customers who we intend to receive these communications, including customers with characteristics of vulnerability, the complexity of the product or service and the manner in which the information will be communicated.
- Monitor, test and adapt communications on a regular basis and make sure that where information is unclear, misleading or incorrect, that action is taken to amend them.
- Review any actions taken in relation to customer communications to make sure that these changes achieve the required outcomes.
- Make sure that all fees and charges are clear and prominent in communications with customers
- Make sure that the protections applicable to products and services or customers, such as the Financial Services Compensation Scheme protection and right of referral to the Financial Ombudsman Service are clearly highlighted.
- Be clear about whether a product is regulated or unregulated.

### 4. Consumer support

We recognise that customers can only pursue their financial objectives when we provide them with the level of support they need to use the product or service they have bought previously from the Motor Insurer.

We will provide customers with support channels which allows them to use products and services as expected and enjoy their benefits. This includes:

- Making how and when customers can access support clear to them.
- Meeting customer's needs, including accommodating customers who are dealing with complex issues, or those who are vulnerable

- If a service is no longer suitable for customers, make it easy for them to switch to another product or exit.
- Being clear about how they can make a complaint when things go wrong
- Carrying out reviews of customer support levels on a regular basis and addressing any issues identified in a timely manner
- Reviewing any actions take in relation to customer support to make sure that these changes achieve the required outcomes

## 7 Treating Customers Fairly (“TCF”):

Treating Customers Fairly (“TCF”) sets out a series of principles that we are required to comply with to demonstrate that we put our customers at the heart of our business.

Under TCF, we should consider the fair treatment of customers throughout the entire customer journey, understand our customers and their needs, ensuring that our business model and strategy takes them into account. We have also put appropriate systems and controls in place to monitor whether our approach to TCF is successful and customers’ needs are being met.

**Outcome 1:** *Consumers can be confident that they are dealing with firms where the fair treatment of customers is central to the corporate culture*

- The Management Body have approved this policy and made it available to employees to ensure that they are aware of their obligations
- Training is available to all employees on understanding TCF obligations. Training is completed at induction and on an annual basis thereafter.
- Complaints will be closely examined to identify any TCF failings and actions taken where appropriate

**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.*

- Progress Vehicle Management work on behalf of referral resources within their network to offer services marketed and sold directly by the referral source. Progress Vehicle Management does not market or sell products directly to customers.

**Outcome 3:** *Consumers are provided with clear information and are kept appropriately informed before, during and after the point of sale*

- Our terms of business do not use ‘jargon’ and takes the information needs of our customers into account

**Outcome 4:** *Where consumers receive advice, the advice is suitable and takes account of their circumstances*

- We have permission to give advice and has a robust suitability process in place which is subject to rigorous monitoring

**Outcome 5:** *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*

- The information provided to our customers regarding our product(s) and service(s) are provided by the referral resource.

**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*

- Complaints procedures have been put in place by the Management Body
- There are no exit penalties applied where the customer wishes to withdraw or change provider

## 7.1 Management Information

Progress Vehicle Management Ltd must be able to measure the effectiveness of our policies and obligations to treat customers fairly and deliver good customer outcomes through Management Information (MI). Where deficiencies are noted, the Management Body must demonstrate that they take positive steps to address them and ensure that no customers were disadvantaged or suffered harm.

The management body will monitor the delivery of good outcomes for its customers through specific MI to act as key performance indicators of meeting the Consumer Duty. This MI is reviewed by the management body on a Monthly basis formally as well as informally on a business-as-usual basis. The formal review process will take place within the Monthly Senior Management Board Meeting.

## 7.2 Conflicts of Interests

Progress Vehicle Management Ltd has a separate Conflicts of Interest policy that sets out how we intend to identify and manage the risks arising from conflicts of interest. Where a conflict is identified as likely to cause a poor outcome for customers, the relevant actions will be taken by the Firm.

## 7.3 Vulnerable Customers

Progress Vehicle Management Ltd has a Vulnerable Customers Policy that sets out how we intend to deal with vulnerable customers and to ensure that they are treated fairly and achieve good outcomes.

# 8 Recruitment

Progress Vehicle Management Ltd's recruitment strategy takes into account the previous conduct and behaviour of potential employees. Where there are indications that a potential employee may have participated in poor outcomes, further references will be obtained and the outcome will be considered in any decision to offer a contract of employment.

Potential employees will be questioned on their experiences of ensuring good outcomes where it is relevant to the role.

## 8.1 Remuneration

Progress Vehicle Management Ltd do not operate a remuneration structure.

## 8.2 Training and Competence

Management make positive behaviours and attitudes towards the delivering of good outcomes as central to how we conduct our business and this is encouraged through effective training and maintenance of staff knowledge.

Any training must embed the concept of the Consumer Duty and TCF within the corporate culture and competence assessments will ensure that the concept is fully understood and implemented. Management has effective controls in place allowing them to identify and act on poor customer outcomes and ensure that good outcomes are encouraged.

## 9 Customer Communications

In its communications with customers, Progress Vehicle Management Ltd does not promise to or imply that we are able to provide services that we are not able or equipped to deliver.

Our communications take into account a customer's information needs and is set out in such a way as to ensure that customers are able to clearly understand the nature of the service that is provided to them by Progress Vehicle Management Ltd and the markets in which the relevant regulated entity dealing with that customer operates in.

Customers must be able to fully understand our Firm's terms, conditions and charges therefore the tone and content of the communications will take into account the likely level of understanding displayed by its customers. Similarly, Progress Vehicle Management Ltd will apply the necessary procedures to ensure that our customers fully understand all costs and charges that they may incur.

Progress Vehicle Management Ltd will communicate with our customers in an open, transparent and easily understandable manner.

### 9.1 Complaints

Customers must be able to understand the Firm's complaints procedure, which must be clear, unambiguous and impartial. The opportunity to refer their concerns to the Financial Ombudsman Service must be clearly stated where the customer is an eligible complainant.

Progress Vehicle Management Ltd will ensure that the service offered to a customer is not negatively influenced by a customer's complaint and customers can be assured that their complaint will be investigated fairly and objectively.

All complaints are recorded and the outcomes monitored with management information analysed by the Management Body to identify any endemic issues within the Firm. The Firm's complaints policy can be found here: <https://www.progressvehiclemanagement.co.uk/complaints-procedure>

## 10 Breaches of Consumer Duty Policy

Any breaches of the Consumer Duty will be recorded on the Firm's breach log in conjunction with its Regulatory Breach procedure.

The Firm will also inform the regulator as required of any areas identified within the respective distribution chains of other firms which are not or may not be complying with Principle 12 or FCA requirements under PRIN 2A.

The Firm will also consider any further information relating to the Consumer Duty and inform the FCA under Principle 11 where it is deemed the regulator would reasonably expect notice.

Commissioner, the independent body overseeing compliance with the Act: <http://ico.org.uk>