



Treating Customers Fairly

Policy for treating Customers

Inter-Credit International ensures that our clients and their customers are at the centre of all that we do. We are fully committed to providing the highest standards of customer service and advice.

Our clients customers need to feel confident that we are fully committed fair treatment and that this central to the culture of our business.

Our Treating Customers Fairly (TCF) policy is centred around the guidance provided by the Financial Conduct Authority (FCA) to ensure we consistently deliver fair outcomes to our clients customers and take responsibility for the company and staff (at all levels) providing an enhanced service quality, based on a culture of openness and transparency. As a company, we take the requirements of the FCA seriously, in particular, the requirement to Treat Customers Fairly.

The FCA has outlined six key themes that are central to the TCF initiative:

1. Consumers should be confident that they are dealing with firms where treating customers fairly is embedded in the corporate culture
2. Services marketed and sold are done so with the aim that they meet the needs of client and are targeted accordingly
3. Consumers should be provided with clear information and are kept appropriately informed before, during and after the service provision
4. Where advice is provided, it takes into account a clients individual circumstances
5. The service provided is of an acceptable standard
6. Consumers do not face unreasonable barriers to make a complaint

We have set out below how we aim to ensure these principles are embedded in our approach to dealing with our customers.

Collections

The collections team operate under a comprehensive recovery policy. The Policy describes our collectors responsibilities to our clients customers who are experiencing financial difficulties and who are vulnerable. The company management do not set collections targets. The staff are strictly guided to ensure that customers only enter into payments commitments which they can reasonably afford based on their financial conditions and personal circumstances. The collectors work is continually audited to ensure that the recovery criteria is maintained.

Training

All staff are subject to in depth training and are then closely monitored and managed to ensure they maintain the necessary knowledge and skills and service levels that meets and surpasses our clients customer's expectations.

Our ongoing training highlights to all staff the importance and the fundamental principles of TCF & Customer vulnerability throughout all areas of the business.

In addition, each employee is provided with a personal development plan, which is updated at appraisal. Our company ensures that all employees undertake Continuous Professional Development (CPD).

All our phone calls are recorded for training and monitoring purposes. A minimum of one call per week is audited for each employee. The call is assessed against our phone audit checklist to ensure TCF and vulnerability criteria are continually maintained. Any shortcomings are addressed immediately with the employee and a skills gap analysis is performed to ensure that the required skills and knowledge are maintained or provided for at all times.

Customer Communication

We aim to provide all communications with our customers, whether oral or written, in a manner that is clear, fair and not misleading.

To this end, we are committed to:

- Informing customers of rights and obligations.
- Obtaining sufficient information in order to understand our customers needs.
- Providing consistency for all of our customers in our dealings with them.
- Acting with integrity and the highest ethical standards at all times.
- Demonstrating a high level of flexibility in dealings with our customers. Providing information in Plain English and minimising the use of industry jargon in both written and oral communications.
- Measuring, maintaining and enhancing the commitment to fairness and demonstrating accountability in our actions.

Staff Remuneration

All our staff are salaried. Where bonuses/rewards are available to staff these are based on both results and adherence to the collection criteria (including full alignment with TCF).

Management Information (MI)

We have comprehensive MI in place to monitor performance of our business. TCF MI is produced and reviewed on a regular basis to ensure any particular problems are identified and acted upon immediately.

Data Protection

Inter-Credit abide by the common principles of Data Protection and confidentiality and ensure compliance by:

- Processing of personal and sensitive data in accordance with relevant data protection legislation.
- Promptly making available information in relation to the customer's financial circumstances, any dispute or complaint, mental health problem in order to prevent collection activity from continuing where it is inappropriate to do so.
- Operating the appropriate controls to ensure that any exchange of data to any third party is lawful and adequately protected.
- Ensuring the appropriate data protection checks are carried out when speaking with customers to verify their identity and where necessary and appropriate, validate and update information received from the customer.

Complaints

Complaint Handling Policy

We are sorry you have had cause to complain. This page explains our complaints procedure and your rights if you remain dissatisfied.

Our commitment to you

We aim to respond to all complaints in a prompt, consistent and fair manner.

Your complaint will be investigated by a suitably trained representative who was not directly involved in the matter that is the subject of your complaint. The member of staff will either have the authority to settle your complaint or will have ready access to someone in a senior position within our business who has the authority.

- If we are unable to resolve your complaint within four weeks of receipt, we will contact you to explain why we are not in a position to resolve your complaint and give you an indication of when we will make further contact.
- In the unlikely event that your complaint has not been resolved within eight weeks of original receipt, we will send you a letter explaining why we have still not resolved your complaint and tell you when we will make further contact.
- Our final response will advise of our findings and, where appropriate, what action is being taken to resolve the matter. We will address the subject matter of your complaint, and where the complaint is upheld, we will offer a resolution that is consistent with treating all of our customers fairly.
- If you telephone us during our investigation and the member of staff handling your complaint is not available, then another member of our team will be able to help you.

Your rights

- If you are dissatisfied with our final response. You may refer the matter to our supervising body the Credit Services Association.
- After Eight Weeks of Inter-Credit being in receipt of your complaint, you have the right to refer the complaint to the Financial Ombudsman Service, if we have replied or not.
- If you decide to refer your complaint to the Financial Ombudsman Service, you must do this within 6 months of the date we issue our final response. After this time the FOS may refuse to consider this matter.



Credit Service Association (CSA),
2 Esh Plaza, Sir Bobby Robson Way
Great Park, Newcastle Upon Tyne
NE13 9BA
Tel - 0191 236 2709
Email - info@csa-uk.com
Website - www.csa-uk.com

General

We are authorised and regulated by the Financial Conduct Authority (FCA), who have set out specific rules for the handling of complaints. Our procedure is compliant with the FCA rules but if you wish to obtain further information you can contact the FCA as follows:



Financial Ombudsman Service
South Quay Plaza,
183 Marsh Wall, London E14 9SR
Helpline: 0300 123 9 123
Website: www.financial-ombudsman.org.uk



FCA Consumer
Helpline: 0800 111 6768 (Freephone)
From abroad: +44 20 7066 1000
Email: consumer.queries@fca.org.uk
Website: www.fca.org.uk/