

Ref	Description of the TCF gap	How we evidence we do it	Priority	What action do we need to take	Who will do it?	1st progress review date	Review outcome & next steps
3E	We take care that any lead generation firms, and other introducers, we use act in an ethical and legal manner	Internal lead sources developing a TCF strategy	High	Internal lead sources developing a TCF strategy	AP	31/03/2007	Review in 6 months
4I	We seek feedback from customers about the usefulness and readability of our suitability letters	Customer satisfaction survey	High	Planning meeting to revise and re-issue survey.	AP	28/02/2007	
9E	We use complaints as a valuable source of feedback about customers' expectations, and the way we should go about meeting them in future	Record all complaints and outcome	High	Develop complaints register	AG	20/03/2007	review in 3 months
4J	We 'sense check' our suitability letters before we issue them, to check that a reader can pick up the key points - and to remove or amend any irrelevant standard paragraphs	Checklist to say this has been read through. Copes kept on file.	Medium	Develop checklist and file	AP	31/03/2007	Review in 3 months
4K	Wherever possible, we issue our suitability letters to customers before the final meeting with the adviser, to encourage customers to clarify and question aspects of the recommendations that they are unclear on before they agree to them	Issued when we receive an app form.	Medium	Possibly move this in the sales process and use as sales aid	AG	28/02/2007	Review and recommendation on outcome of process change
1K	We explain to customers what is and isn't part of the service they are paying for (whether by fee or commission). If part of our remuneration is justified on the basis that it is for providing ongoing reviews, we make sure we follow through on this promise	Suitability letter needs to include if fee has been paid and refer to professional fees document. Suitability letter also details what happens next	Low	Amend suitability letter	DG	28/02/2007	
3G	We don't refer customers, or their personal details, from one of our companies to another without their active consent	Ensure DP statement is completed and recorded for all customers	Low	Review arrangement	AP	31/03/2007	

TCF Planning Tool

Action plan

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4D	Our suitability letters explain why we have selected the particular product and provider – and what factors we have considered (e.g. price, features, service, underwriting, reputation)	Suitability template letter	Low	Add paragraph on service, underwriting and reputation to template	DG	31/03/2007	
4E	Our suitability letters paint a balanced view of the benefits and risks/downsides of the products we recommend	Suitability template letter	Low	Add paragraph to confirm downside to any recommendation	DG	31/03/2007	
4G	Our suitability letters highlight any objectives we have not addressed with our recommendations	Suitability template letter	Low	Add paragraph for objectives you couldn't meet	DG	31/03/2007	
5E	We make sure our advisers who sell protection/GI products are properly trained and competent to do so, even though there are no formal exam requirements to meet	Regular training sessions on cross selling. Invite DBM's into training. In house training course with CMB specific plays	Low	Plan programme of training	AP	31/03/2007	