

Totemic Limited has responded to the consultation on the following areas:

Question	Comment
1	<p><b>The consultation notes positive movement towards linking procedures to treating customers fairly</b></p> <p>Totemic Limited have recently welcomed the draft Guidance from the FCA and its aims in ensuring consistency of outcomes for vulnerable customers regardless of the sector in which a FCA regulated entity operates. A positive outcome and customer experience is central to our operational policies and the culture of our business. For this reason Totemic Limited recognise this is a comprehensive document and incorporates a lot of information with a sound overview of what needs to be put into practice. It's the how that needs to be taken into consideration once this is approved. As highlighted in our previous response a more standardised approach is required in order for firms to perform a gap analysis and target their areas of weakness in order to address this further to achieve consistency across the sectors.</p>
2	<p><b>The statistics referenced bring the policy to life which is really important from an operational perspective. It is recommended that you could provide further information on your own client profile.</b></p> <p>For example, Totemic Limited are aware of their customer profile and this data is continuously monitored which assists in driving our training programme. Weekly MI allows the firm to track spikes in any new disclosures made by clients. This process enabled us to create further policies, for example the Gambling Policy whereby debt advisers are aware not to place clients in a debt solution that may cause further detriment (for example an IVA). A client will have an organised review in 6 months' time to assess their circumstances further and if still eligible decide whether this solution is now suitable. This review would be conducted by the Vulnerable Client Team.</p> <p>Staff members are trained to recognise when the information the firm holds or obtains from customers indicates that the customer is vulnerable and warrants additional support.</p> <p>Our firms also has systems in place to record information on the needs of vulnerable customers and able to make that information accessible to relevant staff via a Vulnerability panel.</p> <p>Some challenges faced around the accuracy of MI are that agents have a free type text box and the IT systems would be unable to identify certain information, as such further enhancements are required to our current IT systems.</p>
3	<p><b>Identification of vulnerable clients. Has the adoption of a conversational model been considered to drive consistency?</b></p> <p>Totemic Limited have a Vulnerable Client policy in place and the firm has progressed with ensuring staff members are fully aware of the definitions, however further work will need to be carried out to avoid using language such as 'Vulnerable client' and use other descriptions such as 'special support team' to ensure no offence as part of soft skills training.</p> <p>The challenges Totemic Limited face on a daily basis is that all clients are deemed vulnerable in line with 'drivers to actual or potential vulnerability' but we also provide specialist support</p>

for our 'particularly vulnerable clients' in line with our regulatory obligations and follow some of the good examples referenced within the FCA's Guidance consultation. The challenges faced and what we strive to continually improve in our business is our processes around those clients that we deem 'insistent.' Our challenge is providing further support or sign posting to clients when we may deem a solution no longer suitable for a client and another debt solution should be provided however the client does not wish or is unable to engage with us. This is particularly relevant with regards to para 4.38 where agents are required to discuss and agree a reasonable payment.

If a client is a blind and wants to access our firms services we are reliant on them seeking assistance with our external parties, therefore more work needs to be done to address these gaps within Totemic Limited. Once a client is identified as being blind or deaf we are confident we adapt our processes and MI is in place following monitoring activity to identify any deficiencies within our controls.

**4** **Examples of signposting suggestions could be provided.**

In situations where our firm is unable or not willing to assist a customer and sign posting information is provided, excellent customer service has been provided. For example there was one instance where we received a telephone call from a suicidal client and as we were unable to offer them help regarding their gambling addiction, we contacted an external party Gamble Aware and we arranged an appointment with them on behalf of the client. The client was unsuccessful in receiving support from Gamble Aware but due to our connections this was arranged, we also touched base with the client until they sought help to offer our support. Whilst examples like these are rewarding to staff members as they see the benefits of helping clients, this is also emotionally straining and time consuming to a business. In order to continue with these excellent customer service standards we are reliant on building our network of external partners to provide positive outcomes for our clients. Further reviews are also required from a HR perspective to ensure we are providing our agents with adequate support.

Part of our firm's objectives is to provide omni-channel communication for our clients so there are little barriers for clients to seek help. However face-to-face advice is provided in limited circumstances. To ensure adaptations and enhancements can be provided further work will need to be carried out with our referral partners, as we are reliant on external parties to provide further support for example CAB and CAP there is currently a 3 month waiting time.

**5** **Further comments**

Senior management are heavily involved in new initiatives with our external party relationships for example domestic abuse victims, therefore vulnerabilities are at the forefront when considering the client journey in new initiatives.