



# Treating Customers Fairly Policy

## Policy statement

We (Joel Malach trading as Homeowner Loans) ensure clients are at very heart of all that we do. We are fully committed to providing the highest standards of customer service through our online platform.

Where we have alluded to “Customers” in this policy, we refer to all Third Parties who use our Homeowner Loans website to explore loan options and potentially make an enquiry through it.

Our customers are our most valuable asset and our aim is to ensure we deliver a user-friendly, robust, reliable and cost-effective service to all concerned.

As a part of our overall approach we are fully committed to treating our clients fairly and as such we endeavour to meet their expectations of high quality service.

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

As a firm, we take the requirements of the FCA seriously, in particular, the requirement to treat customers fairly.

## The 6 Themes of TCF

The FCA has outlined six key themes which are central to our TCF initiative:

1. Customers 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 customers and are targeted accordingly.
3. Customers 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 client’s individual circumstances
5. The service provided is of an acceptable standard
6. Customers do not face unreasonable barriers to make a complaint



## **Treating Customers Fairly within Our Business**

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

Treating Customers Fairly (TCF) is a core principle of our company and the way we conduct our business.

We are constantly striving to improve our service and develop new and innovative ways to communicate our services and new product information to all parties who may have dealings with us in the future.

Central to our TCF ethos is our commitment to providing clear and concise information, free of "jargon" and written in plain English.

### **The core principles of our "Treating Customers Fairly" Policy are as follows:**

1. Homeowner Loans is an organisation which holds the fair treatment of our customers as central to our corporate culture.
2. Products and services marketed in the personal finance market are designed to meet the individual needs of our customers. We make clear on our website the pros and cons of each product type and ensure that representative APR costs are present and all cost information is transparent.
3. Our customers are provided with clear information by the broker they are introduced to and are kept appropriately informed before, during and after their personal finance enquiries by the broker.
4. Although we don't offer advice we ensure that our website provides information to a level of detail and is organised and structured in such a way that our customers should be able to decide for themselves which if any products may suit their circumstances.
5. Customers will not face unreasonable post-enquiry barriers and there is no obligation to proceed with any loan offer made by the broker. Customers may enquire about different product types so they can explore options in more depth. We do not charge any fees for our enquiry service. Customers have the option of making a complaint - full details are given in the Homeowner Loans Complaints Policy ([www.homeowner-loans.co.uk/dox/homeowner-loans-complaints-policy.pdf](http://www.homeowner-loans.co.uk/dox/homeowner-loans-complaints-policy.pdf))
6. We will ensure that any complaints or grievances are handled in a sympathetic, positive and professional manner and within a reasonable time-frame.
7. We will ensure that members of staff are kept up to date with relevant training in relation to competence, data protection and other matters directly affecting the quality of service offered to customers.
8. We will ensure our staff undertake training in the principles of TCF as and when appropriate, ensuring continuing professional development by encouraging reading of the trade press, FCA website, CCTA newsletters and dissemination of relevant information as and when it becomes available.



## Our Service

- We ascertain the appropriateness of the requested service for all new customers prior to accepting a deal, ensuring it is in line with their knowledge and experience.
- We continually aim to understand the needs of our customers.
- We aim to keep our clients fully informed in a clear and fair manner that is unambiguous and not misleading.
- We ensure our services are delivered with clarity and transparency and do not contain hidden conditions or rely on complex technical definitions.
- We will keep an accurate and comprehensive record of all our dealings with a customer, so that in the event of any dispute or discrepancy, we will be able to provide a full breakdown of interchanges between all parties.
- We make certain our clients understand the risks associated with our services at the outset of an instruction, where appropriate.
- We work hard to ensure that service and risk information remains clear and prominent at all times.
- In the unlikely event that there is a conflict of interest, we will inform our customers as soon as possible once we become aware of it.

## Our Approach

- Our priority is to provide our clients with an excellent service underpinned by quality and choice.
- Our service is shaped by listening to our customers' needs and understanding what is important to them. We take responsibility for meeting the needs of our customers and always look for ways to improve the quality of our service.
- We aim to treat our clients fairly and deliver high quality services which meet their expectations throughout their relationship with us.
- We recognise that our employees are critical to delivering a positive client experience and ensuring our customers are treated fairly. Our culture and values encourage and support our employees to deliver this.
- All of our employees are fully trained in dealing with our customers, and in treating them fairly. We remunerate and incentivise our employees to encourage them to deal with all customers fairly, and to continually find ways to improve.



## **Complaints Handling**

We respond in a timely manner to our customers' and prospective customers' questions and queries, and address any issues or concerns promptly. All customer complaints are dealt with and escalated as appropriate and as required by us in order to meet our obligations to our customers.

Our process is in line with the current guidance from the FCA and is in line with the principles of the FCA that "a firm must pay due regard to the interests of its customers and treat them fairly".

Senior management will pay attention to the outcomes of complaints, which can serve as an important source of intelligence about the health of our business and systems. We will investigate the root causes of complaints and obtain feedback from customers who have experienced our complaints process in order to improve the level of service that we provide.

We will measure the length of time taken to deal with a complaint, the outcome, and the way in which the outcome is communicated to the customer in order to ensure that we are treating our customers fairly.

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