**Foreseeable harm gap analysis**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Possible foreseeable harm** | **Evidence of firm’s current position** | **Remedial action needed** | **MI to monitor to identify changes/status quo**  | **Allocated to** | **Review / completion date** |
|  |  |  |  |  |  |
| **Customer unable to easily cancel policy** | ***Example:*** *The cancellation procedures are in the TOBA The process for contacting the firm is the same for all communications* | ***Example:*** *Cancellation process to be drawn to the customers attention at inception and renewal* | *Cancellation / lapse ratio**Top 5 reasons for cancellations**Complaints linked to cancellations* |  |  |
| **Customer unable to easily claim under their policy** | **Example:** How to claim under the policy is drawn to the customers attention at inception and renewal. Signposting used.Information in TOBA.Separate claim sheet issued.Inhouse claims team.*The process for contacting the firm is the same for all communications***.** |  | ComplaintsClaims data PI Claims |  |  |
| **Customer unable to easily Complain about a product or service.** | **Example**: Firm has complaints procedures in place. Training on complaints is refreshed annually. *The process for contacting the firm is the same for all communications*. |  | Complaints dataComplaints referred to FOS |  |  |
| **Customers instructions not followed.** | **Example:** All communications with clients are recorded on the file and where an action is required this is confirmed back to the client in writing. Process documents and checklists in place.File audits conducted. |  | File auditsE&O logPI Claims Breaches log |  |  |
| **Products and services performing poorly** | **Example:** Downstream fair value assessments completed. Target market statements (TMS) read and recorded in TMS register. Clients are issued with statements of demands and needs and enabled to make an informed purchasing decision about whether the product is suitable for them. Product training ongoing.The firm has looked at different groups within the target market to ensure consumer understanding. Customer feedback collated.Complaints analysed . |  | Complaints logClaims repudiated.Fair Value assessmentsTarget Market Statements register.File audits – Demands and needs statementsTraining logs  |  |  |
| **Products being distributed to customers who are outside the manufactures target market.** | **Example:**  Target market statements read and recorded in TMS Register. Clients are issued with statements of demands and needs and enabled to make an informed purchasing decision about whether the product is suitable for them. Product training ongoing.File audits conducted |  | Target Market Statement registerFile auditsTraining Logs |  |  |
| **Poor advice to customers** | **Example:-** Training undertaken on products and services.Competency assessed regularly |  | Training recordsFile auditsPI claimsComplaintsFeedbackRepudiated claims |  |  |
| **Customers incurring overly high charges**  | **Example: -**Remuneration policy in place.Fees explained in advance and shown separately. Remuneration disclosure highlighted in TOBA.Fair Value assessments conducted.Source and Type of remuneration identified. |  | Revenue split between commission and feesFile audits – picking up misinformation on charging/fees  |  |  |
| **Customers with characteristics of vulnerability unable to access/use a product or service.** | **Example:** Vulnerable customers policy in place. Training refreshed annually on working with customers with characteristics of vulnerability. Files audits conducted. |  | ComplaintsClaims repudiationsTraining recordsFile audits  |  |  |