

Consumer Duty Checklist

To help ensure your business is Consumer Duty compliant, we've created the following checklist of required and suggested tasks in need of completion prior to the July implementation deadline.

We've created this checklist with Star IAR and Star T&C clients in mind, providing clear instructions on how to configure your instance(s) for Consumer Duty so your firm can clearly and confidently evidence the four key outcomes desired by the Duty:

- 1 Products and Services
- 2 Price and Value
- 3 Consumer Understanding
- 4 Consumer Support

About StarCompliance

With clients in 114 countries, StarCompliance is a global leader in employee compliance technology. Our scalable, easy-to-use compliance software solutions provide a 360-degree view of employee and business activity to help firms monitor for conflicts, reduce risk, meet regulatory obligations, and gain efficiencies.



T&C Clients

Consider creating an Assessment Form and process in T&C to capture evidence on a regular basis that each manager and their direct reports understand their service and products.

We've identified several data points captured in T&C today that can help you provide input into—and provide evidence on—conformance to Consumer Duty:

T&C Records

- Supports Consumer Duty Outcomes 1-4
- Training and competence records: Analyse staff training records, including remedial actions where staff knowledge or actions were found to be below expectations

Case Checking

- Supports Consumer Duty outcome #2 – Price & Value
- File reviews: Review customer files and monitoring calls to check for errors and assess if customers received good outcomes (this is particularly useful for sales processes).

Complaints

- Supports Consumer Duty outcome #4 – Consumer Support
- Numbers of complaints: trends in numbers of complaints involving poor customer outcomes throughout the customer-firm relationship
- Complaints root cause analysis: investigating complaints fully to understand the cause of customer complaints, not just dealing with the symptoms

Financial Promotional Material

- Supports Consumer Duty outcome #3 – Consumer Understanding
- Create an approval process for all promotional materials, generating an accessible audit trail of approvals and denials to ensure all external messaging is honest and easy for consumers to understand.
- Use counts of approvals and denials to identify areas of improvement for future product and service messaging.

IAR Clients

Required Tasks

- There is a new Individual Conduct Rule #6 that requires all conduct rule staff to 'act to deliver good outcomes for retail customers' where the activities of the firm fall within the scope of the Duty. Amend your F&P forms as part of employee certifications to incorporate the new conduct rule wording
 - [▶ VIDEO: Consumer Duty #1 - Amending F&P Forms](#)
- The wording on your Certificates will need updating to reflect the new conduct rule. Please submit a Star service desk ticket so we can assist with this particular update. The service desk ticket should be submitted as Medium Priority and the subject line should read: *"Consumer Duty – Certificate Wording Update Required Ahead of July 31 Deadline"*.
- If you use IAR to manage the Conduct Rule Attestation process, you will also need to update the wording on the Conduct Rule Attestation form.
 - [▶ VIDEO: Consumer Duty #2 - Amending Conduct Attestation Forms](#)
- If you use the Conduct Rule Breach capability in IAR, you will need to add the new conduct rule into the breach configuration so it can be captured and reported on.
 - [▶ VIDEO: Consumer Duty #3 - Conduct Rule Breach Configuration](#)

Suggested Tasks

- You are required to identify an individual in the business who will be the "Consumer Duty Champion". The FCA has chosen not to make this a new Prescribed Responsibility, but you can add this as a Firm Specific Responsibility in the SMR module and allocate it to a NED or Senior Manager so they can track and audit it. This simple addition will make it easy to capture the delegation of this responsibility using our new Reasonable Steps capability and ensure a regular review process is placed around the Champion role.
 - [▶ VIDEO: Consumer Duty #4 - The Consumer Duty Champion](#)

With the exception of the Certificate change (which requires a service desk ticket), all other changes listed can be achieved via self-service configuration. If you do need assistance, however, please reach out to your designated Relationship Manager so they can assist you with a Change Order request. The request will then be routed to the Professional Services team to action. Please ensure any requests for assistance are made in good time, well ahead of the regulatory deadline of July 31, 2023 to ensure we have enough time to support you.