

Joint Equity Treating Partners Fairly Charter

This Charter is the undertaking that Joint Equity and all our staff makes to our Partners.

1. Introduction

- 1.1. Treating Customers Fairly (TCF) is a fundamental requirement of the Financial Conduct Authority (FCA) for all its regulated organisations and is updated at regular intervals.
- 1.2. However, the service Joint Equity provides is not an FCA regulated activity, and therefore we are not a regulated Company. The FCA does not allow anyone to voluntarily register for regulation.
- 1.3. We believe that treating our customers fairly is the most important aspect of our business culture and model. We also absolutely acknowledge that our Resident Partners are making the most significant investment in their lives and we have to ensure that they are presented with all the facts, both good and bad, about the Joint Equity Scheme.
- 1.4. We have, therefore, adopted all the relevant requirements for an FCA Regulated company and in many cases, we have exceeded their minimum requirements.
- 1.5. Joint Equity does not see TCF as part of a regulatory regime aimed solely at the Resident-Partner but as the essential part of our business ethic, culture and model that extends to all our Partners.
- 1.6. Consequently, Joint Equity has developed and adopted its own TCF process, appropriately called, Treating Partners Fairly (TPF) Charter and Policy.
- 1.7. The TPF Charter and Policy will be reviewed and updated at least annually in March of each year

2. What Joint Equity does to ensure we Treat Partners Fairly

- 2.1. This Charter and the Joint Equity Treating Partners Fairly Policy are part of our staff, representatives and partners induction and training.
- 2.2. The Joint Equity Treating Partners Fairly process is the responsibility of the Joint Equity Chief Executive Officer.
- 2.3. All staff are under an obligation in their conditions of employment to comply with this Charter and our Treating Partners Fairly Policy at all times.
- 2.4. All Joint Equity staff sign the Charter on joining Joint Equity and must keep their copy in their company handbook up to date.
- 2.5. Independent companies or individuals who are approved representatives of Joint Equity are required to comply with this Charter and the TPF Policy as part of the conditions of appointment.
- 2.6. Any employee or representative who believes they have found any written or web based representation that does not comply, or might not comply, with this Charter or Policy must report it immediately to the Joint Equity Chief Executive (CEO).
- 2.7. Any employee or representative who believes they have not, or might not have, complied with this Charter or Policy must report it immediately to the CEO.
- 2.8. Any employee or representative who believes that anyone in our organisation, or any other organisation that has contact with our Partners, has not complied with this Charter or Policy must report their concerns immediately to the CEO.
- 2.9. Reporting any concern or non-compliance is not a disciplinary matter, however, **NOT** reporting any concerns most certainly is treated as a disciplinary matter.
- 2.10. The CEO will maintain, at all times, a dedicated email address for staff to report concerns or non-compliance. tpf@jointequity.co.uk.
This email address is for staff and representative use only and is not part of our Partner Complaint process, which is a separate process and can be found at: <https://www.jointequity.co.uk/complaints-procedure/>

www.jointequity.co.uk

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- 2.11. The CEO, or his authorised TPF deputy, undertakes to respond within 1 working day to the originator.
- 2.12. The CEO, or his authorised TCF deputy, undertakes to complete an initial investigation and report back to the originator with 2 working days with a planned series of actions.
- 2.13. The CEO undertakes to complete any additional actions within the planned time.
- 2.14. The CEO undertakes to circulate the problem raised, the findings, and any remedial action to all staff and representatives, as soon as practicably possible, but not later than 5 working days after the issue is resolved.
- 2.15. The elements of this process and its outcome(s) are recorded in the central Joint Equity TCF file.
- 2.16. In practice this all means we are identifying potential or actual gaps in TPF practice and developing procedures and checks to close these in the following areas:
 - 2.16.1. Staff training/awareness of TPF
 - 2.16.2. Sales and marketing material
 - 2.16.3. Product understanding
 - 2.16.4. Information provision and sales process
 - 2.16.5. Fact find and flow of information to the client (including after-sales)
 - 2.16.6. Complaint handling
 - 2.16.7. Remuneration/incentives
 - 2.16.8. Risk assessment of TPF non-compliance
 - 2.16.9. Record keeping and Management Information

3. What our staff do to ensure we Treat Customers Fairly

- 3.1. We must never forget that all Joint Equity Clients are individuals and that they have specific needs and requirements.
- 3.2. We recognise and accept that the Joint Equity financial product is directed at a specific sector of the market and section of the population and that other options maybe more appropriate for the particular Client and their circumstances.

	Social	Private	Joint	Owner
	Housing	Rented	Equity	Occupied
Owned	0 - 50 %	0 %	50%	100 %
Rented	100 - 50 %	100 %	50 %	0 %

- 3.3. All Joint Equity staff and representatives have a responsibility to ensure that all alternatives have been explored to see if there is a more suitable product for the individual client.

4. Management Information

- 4.1. TPF must be supported with appropriate reporting of Key Performance Indicators (KPIs) that will provide the CEO and Board with confidence that we are complying with our undertaking or provide early warning that we are not.
- 4.2. All regular Joint Equity board meetings will have an Agenda item for the Treating Partners Fairly Report which will be presented by the CEO or his appointed TPF deputy.
- 4.3. The report will contain up to date data on all current KPIs.

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4.4. The current KPIs are in 2 parts and cover:-

- Partner TPF KPIs
 - Repayment of Partner Deposits
 - Communications with Partners
- TPF Non Compliance
 - Non Compliance with this TPF Charter or Policy

4.5. All KPI performance is published quarterly on the Joint Equity web site. <https://www.jointequity.co.uk/treating-partners-fairly-kpis-targets-and-results/> latest versions of the TPF Charter and Policy can be downloaded from this page as well

4.6. Partner TPF KPIs

- 4.6.1. Reply to all Partner questions within 1 working day. - Target 100%.
- 4.6.2. Repayment of Resident Partner and Non Resident Partner deposits, by post or bank transfer within 1 working day. - Target 100%
- 4.6.3. Payment of Non Resident Partner Payment on contractual due date. Target 100%

4.7. TPF non-compliance

- 4.7.1. Number of Notices of Non-Compliance
- 4.7.2. Time to respond on Notice of Non-Compliance within 1 working day. Target 100%
- 4.7.3. Time required for CEO initial report on Non-Compliance with time bound action plan within 2 working days (3 days from Notice). Target 100%
- 4.7.4. Time required for the CEO to report on problem and action required to all staff within 5 working days from resolving the problem (8 days from Notice). Target 100%

Signed & authorised by

Brad Bamfield

Joint Equity Ltd
CEO

April 2017

Version control:-

Version	Date	Changes
1.9	29/04/17	Revised in line with latest FCA TCF guidance, reg office address updated,
1.8	29/04/16	Changed web links to new site, annual review
1.7	29/04/14	Changed FSA to FCA, new Partner names applied. Joint Equity new Logo added. Annual review added. Minor setting out changes
1.6	04/01/12	Additional Partner KPI added, link to TPF page on web site added.
1.5	09/03/09	Reporting problems email address added
1.4	04/04/08	Minor typo errors corrected
1.3	05/01/08	Initial publication