



CUSTOMER CHARTER

THIS CHARTER

Our Customer Charter outlines the principles, values and customer service standards on which our company is based. It is a living document that we update on a regular basis.

CLIENTS

Each client is assigned a dedicated pension administrator – we are not a call centre. One of the highlights for our staff is to be able to work with an entire family of clients from children through to grandparents, due to the range of products we offer. All of our client literature is easy to read and digest, meaning that it is clear, fair and not misleading. This carries through to our fee structure which is designed to be transparent with no 'hidden' extras. On the rare occasion that a customer wishes to make a complaint, a senior member of staff will carry out a thorough investigation in accordance with the standards and timescales set out by the FCA. We pride ourselves on our exceptional customer service and are so confident that clients will want to stay with us long-term that we do not charge to transfer-out to another pension provider.

STAFF

We believe that Hartley is only as good as the staff we employ. We invest time and money into the continued professional development of our staff to enable them to deliver the best service to our clients. Our in-house technical team runs regular training seminars for our teams to ensure that they keep abreast of current trends and topics within the industry. In addition, we also offer training and support to all members of staff who wish to work towards exams. To this end, all of our pension administrators are in the process of or have already gained a wide range of well-respected industry qualifications.

COMPANY

Hartley Pensions Limited ("Hartley") is a key subsidiary of the Wilton UK (Group) Limited, an independent professional firm with offices in London, the Isle of Man, Dublin and Dubai. Hartley has over 35 years experience in the SSAS and SIPP industry, setting up its first SIPP ten years ago. We offer a varied range of pension products including ISAs. Our specialist technical team is at the core of our business; it ensures that we remain a forward-looking company. We pride ourselves on our popular blogs which we publish on our website and on our technical newsletter which keeps IFAs and clients up-to-date with what's happening in the industry. Data protection is taken extremely seriously and we have recently published an industry update on the forthcoming GDPR regime. Members of our compliance team regularly attend industry updates, seminars and workshops in order to keep the company not just compliant but one step ahead of the curve. We collect Management Information on an ongoing basis; this is then audited and findings are reported to the board to recognise where we can improve our service standards. Over the years we have built valuable relationships with accountants, banks and legal counsel, ensuring that the service we offer clients is compliant, accurate and informed.





AUDIT / RESULTS

Hartley ensures that its audit policy meets FCA Senior Management Arrangements, Systems and Controls under SYSC 6 Compliance, internal audit and financial crime. We have an internal audit function that has clear responsibilities and reporting lines to Senior Management. We guarantee that this function is adequately resourced with competent individuals that are independent of the day-to-day activities of the company, and have appropriate access to the company's records.

The internal auditors' function is to assess Hartley's adherence to and the effectiveness of internal systems and controls, procedures and policies.

The internal auditors must:

1. Establish, implement and maintain an audit plan to examine and evaluate the adequacy and effectiveness of the company's systems, internal control mechanisms and arrangements;
2. Issue recommendations based on the result of work carried out in accordance with (1);
3. Verify compliance with those recommendations; and
4. Report in relation to internal audit matters.

Internal Auditor - Richard Cropley Cert CII (FS), Technical Associate
Senior Manager responsible for Audit Function – Michael Baber, FPFS, Technical Director

OVERALL TARGET RATING 95%

Year-to-date (April, 2017 to October 1, 2017) rating:

Task	Rating
New Business	99%
Transfer In	95.16%
Transfer Out	99%
Contributions	94.80%
Benefit Crystallisation Event	93%
Payments	91.50%
Investments	95.68%
LTA tests at age 75	100%
Overall Total	96.0%





ENDORSEMENTS

Viki Heminsley - Chief Operating Officer, Hubwise Securities Limited:

"We chose Hartley from a selection of pension providers to provide us with a white-label SIPP for our investment platform. Hartley impressed us with their proposition and it was clear from the outset that both of our companies share the same fundamental values. We were delighted to find in Hartley a partner with the same outlook and innovative approach to the ever-changing nature of pensions as our own. Both of our companies owe their individual success to an adaptable and forward-thinking attitude towards business and investments, coupled with exceptional customer-focused service.

It is clear to us that Hartley truly understands the reciprocal nature of a business relationship, where service standards, attitudes and actions reflect both companies and their respective business partners, not simply one company in isolation. We unreservedly recommend Hartley as our chosen SIPP provider and we look forward to a long and fruitful partnership with them."

Robert Draffin – Wealth Manager, BDO Northern Ireland:

"BDO Northern Ireland have utilised the services of Hartley Pensions for several years for SIPP and SSAS provision. BDO Northern Ireland would particularly emphasise their qualities in the following respects:

- Excellent technical knowledge demonstrated by the whole team
- Friendly appointed client contacts make for a straightforward day-to-day service
- Solution focused approach to problems
- Ability and flexibility to deliver client objectives when presented with deadlines
- Their expertise in respect of property transactions





SERVICE STANDARDS FOR HARTLEY PENSIONS LIMITED

	Maximum Working Days	Notes
New Online Application Service Standards		
SIPP establishment	1	If the client fails initial AML verification additional information may be required before the SIPP is fully established.
Acknowledgment issued for receipt of application.	1	
Cooling off notice issued	1	
Application to RBS	1	Upon receipt of a complete application pack. This is by way of an automated email.
Set up of Scheme Summary and internal records	1	
Transfer in applications issued	3	Upon receipt of fully completed transfer documentation
Chaser for Non Origo Transfers	5	Unless a timescale/information has been provided previously by the ceding scheme.
Correspondence		
Full response to routine correspondence	5	
Calculations		
Pension calculations (including 3rd party action)	5	Upon receipt of all information and Valuations
Payment of Benefits	14th or 28th of each month for pensions	Upon receipt of all documentation and Risk Assessments
Lump sums paid	Within 2 days	Upon receipt of all documentation and Risk Assessments
Pension transfers on exit	5	Upon receipt of all documentation and funds returned to SIPP account
Money transactions		
Incoming monies actioned	1	This is dependent on receipt of the transfer confirmation paperwork or other completed paperwork required.
Outgoing Money requests	2	
Bank statements reconciled	Same day	
Complaint Handling		
Acknowledged the complaint	2	
Respond to the complaint	FCA complaint process followed	

Notes:

Definition of working day – 1 = 24hours

The times are the maximum timescales and are the basis of measurement.

We would aim to work within those maximums where possible.

Hartley Pensions Limited

5th Floor, 25 Marsh Street, Bristol, BS1 4AQ Authorised and regulated by the Financial Conduct Authority 735936 and registered in England and Wales 09469576 T: 0117 316 9991 E: admin@hartleysas.co.uk W: www.hartleypensions.com