

HARTLEY  
PENSIONS

# DUE DILIGENCE PACK



## OUR PRODUCTS

Hartley Pensions aims to provide clients with a range of financial products that can meet current and future investments needs. We can make that claim by offering you:

- A simple charging structure with no hidden fees
- A personal professional pension administrator
- The ability to accumulate a pension fund in a variety of flexible investments
- Full Drawdown options available to tailor your client's retirement
- A company with old fashioned values and a modern vision
- No transfer-out fees

We offer a number of pension products to suit your requirements. Clients can move freely between the products to ensure they have the right pension functionality at the right price.

### ABACUS SIPP

Low-cost SIPP that allows you to invest your pension into one investment platform

### PROSPERITY SIPP

Diversify your pension across many different investment classes to suit you

### EMPIRE SIPP

Provides the ability to hold commercial property within your pension

### HARTLEY SSAS

Occupational pension scheme that can be used to buy property, hold investments or lend money to your company

### JUNIOR SIPP

Available for those under 18 to start their pension saving in a cost effective product

### CONTRIBUTION ONLY SIPP

Build your pension savings with an investment platform of your choice



## OUR DIRECTORS

TONY FLANAGAN

Director & Managing Partner

Tony is Director and Managing Partner of Hartley Pensions Limited. He is a qualified member of the Institute of Chartered Secretaries and Administrators and holds further qualifications in Business Administration and Business Marketing. Tony's expertise includes taxation, trustee services and corporate finance.

DENIS MCHUGH BSC HONS C DIP PENS

CEO Hartley Pensions Limited

Denis has spent over 20 years in financial services with blue chip companies, having worked for Aviva, Mercer and Davy Stockbrokers (Dublin). Denis is a member of the Pensions Management Institute and holds various qualifications in pensions and stockbroking plus a degree in computing. Denis' expertise includes pension product design and trustee services. Prior to becoming CEO he was the Managing Director of Hartley SAS.

CLAIRE JONES FCCA

Head of Accounting & Finance

Claire is a fellow member of The Association of Chartered Certified Accountants and has served over 20 years with the company. Her knowledge and experience gained during this time, along with her qualifications, has allowed her to play an important part in the company's success.

MICHAEL BABER FPFS MCSI

SIPP Technical Director

Michael started as a Financial Adviser. After a number of years, he decided that his passion was within the technical side of financial services and in 2012 joined Hartley. He has an in-depth knowledge of HMRC and FCA regulations for all financial products.

Michael is our Head of Training and encourages staff to gain a solid foundation of knowledge by studying for financial qualifications.

ANDREW PLADGEMAN

Director of Pensions

Andrew joined Wilton (IOM) Limited in 2017 as Director of Pensions and is an Executive Member of the Board at Hartley Pensions. Andrew brings an eclectic wealth of experience from leadership roles in the public and private sectors in the UK from 40 years in the pensions industry and more recently as the pensions lead for the Isle of Man Financial Services Authority. Andrew has a special interest in our proposition for overseas clients.



## TECHNICAL TEAM

Hartley benefits from a highly experienced in-house Technical department, with over 60 years of financial services experience, which supports and trains the SIPP administration team.

Heading up Technical is Michael Baber. Before joining Hartley in 2012, Michael worked as an IFA and so combines in-depth technical knowledge with commercial experience. As well as being the SIPP Technical Director, Michael holds regular training sessions for all staff members and has recently become a Chartered Financial Planner through the CII. Michael works alongside Richard Copley, who has worked for Hartley for seven years. Richard was a senior member of the SIPP administration team and now assists Michael in the Technical department, carrying out internal auditing, advising staff and training new recruits.

## ADMINISTRATION TEAM

Our experienced SIPP administration team is managed by Julian Bailey. Julian held management posts in the wealth departments of NatWest, RBS and Coutts before joining Hartley in 2014.

You will be assigned a dedicated administrator who will be your point of contact for all of your administrative needs. We do not operate a call centre and we do not believe that being passed from one team to the next when you have a query is an efficient use of your time. Our office is open 9-5, Monday to Friday and should the appointed administrator be unavailable, all members within the team will be able to assist with an enquiry.

## BUSINESS DEVELOPMENT

Martin Keenan is Hartley's Business Development Manager. Martin has over 25 years experience in finance; working with IFAs and holding key positions at firms including Old Mutual, Aegon and Zurich. Martin obtained the Diploma in Financial Planning through the CII, and we were delighted when he joined Hartley in 2016.



## OUR CORPORATE STRUCTURE & ULTIMATE BENEFICIAL OWNERSHIP

Hartley Pensions Limited is a subsidiary of the Wilton UK (Group) Ltd. Wilton is an independent professional firm with offices in London's Mayfair, Bristol, the Isle of Man, Dublin and Dubai. The group was founded in 1999 by Tony Flanagan, who retains ultimate ownership, with the aim of offering a professional, personal and discreet service to clients. The specialist services offered by the group, amongst others, include:

- International and domestic tax advice
- Corporate finance
- Family office
- Wealth management
- Specialist and offshore services
- Property sourcing
- Dental property investments
- SIPP & SSAS products

The width and breadth of services offered means that financially the group is on a stable, secure footing. Wilton is always looking to grow organically as well as acquire new businesses that will complement and enhance existing activities. Please refer to the enclosed Organogram for full details.

## RETIREMENT BENEFITS DRAWDOWN

We aim to be a flexible provider and with regards to our pension schemes, we offer all HMRC Drawdown options. This includes capped drawdown (for existing capped drawdown clients only), flexi access, phased flexi access, UFPLS, up to 24 regular income payments pa, ad hoc PCLS payments, triviality payments, in specie benefit payments and full fund withdrawal.

We understand that often the payment of our retirement benefits are time critical to our clients and so we deal with all enquiries and requests with the utmost urgency. We will make any PCLS payments within 48 hours of receipt of all completed forms.

## INVESTMENTS

Like HMRC, we do not publish a list of acceptable investments or approved product providers. However, we will accept investments that are deemed to be in-line with the regulations for the product the investor has chosen, for example fixed interest stocks and regulated unit trusts. In some circumstances we may be willing to accept investments in unquoted shares.

In all instances, an investment must be approved by the Hartley Investment Committee, an independent committee made up of senior directors within Hartley & Wilton. The committee is presented with a due diligence report regarding the structure and intentions of the investment and will either approve or reject an investment based on the information presented. By approving an investment this is confirmation that the investment is suitable to be held within a Hartley product and meets, at the very least, the minimum requirements set out by the regulator. The committee does not pass comment on whether the investment may or may not be suitable for an investor. The committee meets on a regular basis also to review the on-going acceptance of the approved investments.



The Investment Committee will not need to be involved where an investor is looking to purchase a commercial property. In 1982 we bought our first property to be held within a pension scheme. The experience we have gained over the years is available to help your clients through the purchase process and long term administration of the property. Through Wilton, we can assist in finding the right property, finding tenants, drawing up the lease and ongoing property management. We have a separate information sheet with how we deal with the commercial property purchase process and the subsequent administration.

## CLIENT MONEY

All client monies are held in segregated client money bank accounts in line with FCA regulations. Investor assets are segregated from our own assets and held in the name of a wholly owned non-trading nominee company.

## CAPITAL ADEQUACY

The FCA introduced a new and improved capital framework for SIPP operators in September 2016. In doing so, they prescribed a minimum level of capital that we are expected to have invested in our business based on the level of Assets Under Administration (AUA) and the level of Non Standard Assets that our members hold. The purpose of this new capital framework was to ensure that, if the worst comes to worst, we can afford to exit the market without causing detriment to our members.

Hartley Pensions Limited is proud to confirm that we are in full compliance with these rules and are committed to maintaining capital headroom in excess of the regulatory minimum.

## SYSTEMS & CONTROLS

### **Staff Training**

One of the factors that we believe that makes Hartley different is our staff. We invest time and money into the continued professional development of our staff in order for them to deliver the best service to our clients.

Our staff are also encouraged to work towards industry-recognised qualifications including, but not limited to the Chartered Insurance Institute (CII), Chartered Institute for Securities and Investment (CISI) and Association of Accounting Technicians (AAT). In the recent past, our staff have gained the following qualifications with the CII:

Advanced Diploma in Financial Planning  
Certificate in Life and Pensions  
Certificate in Investment Operations  
Certificate in Regulated Financial Services Operations  
Award in Financial Administration (Pensions)

### **Data Protection**

Hartley Pensions Limited takes data protection very seriously. We adhere to the rules of the Data Protection Act 1998 and follow the guidance of the Information Commissioner's Office (ICO). We have adequate policies and control frameworks in place to control the flow of data throughout our organisation and to deal with any breaches that may occur.



### **Anti-Money Laundering (AML) & Fraud prevention**

We carry out thorough due diligence checks in order to comply with our anti-money laundering obligations. The identity of every new client is checked and verified by the new business team using SmartSearch software package. AML checks are carried out on all business partners and advisers must be FCA-regulated before they can introduce any business to us.

Every member of staff receives AML training on joining Hartley and receives ongoing training to keep them up to date with any relevant changes. Part of the training covers what may be identified as suspicious activity and what the correct reporting procedures are to the MRLO.

Members of the compliance team regularly attend AML and cyber security workshops, held by the industry experts. Our policies and procedures are updated regularly to keep on top of these trends.

We use an email security system called Mimecast which filters out any potential unwanted emails, contacts and hacking attempts. We use a reputable IT support company called Orchard Computer Services which carries out regular software updates and alerts us to any security problems.

### **Disaster recovery**

In the event of a disaster, our IT systems and files are protected. We have the maximum available cover with Orchard Computer Services by way of an IT service agreement. All of our work is backed up on a weekly and monthly basis and kept for 12 months. These back-ups are copied to Orchard's secure Data Centre. Senior Management staff with home access are also protected by Orchard remotely. We have access to off-site office locations within Bristol, and outside Bristol in any major city if required. We also have an off-site home office which is set up to accommodate staff in the event of a major disaster or if we were not able to work in a city location.

### **Business Continuity Plan**

In the event of a disaster, we have robust Business Continuity measures in place to ensure that if ever our services are disrupted, we can ensure that the impact to our business partners and our clients is minimised. In the event of a major incident, our overall aim is to have communication links established within four hours of the disruption with a fully workable and recovered system within 24 hours of the notification.

### **IT Systems**

At present we use our own in-house software package which holds all client policy data known as Scheme Summaries. This software gives us the flexibility required in order to adapt to any regulatory changes that may be imposed, or any specific reporting requirement that you or a client may have. We are a forward thinking company and strive towards providing our clients with the best administrative services. As such, we are currently in the process of implementing a new software administrative system supplied by a market leading provider, which is at the forefront in financial services technology solutions.

Once the new system has been fully integrated with our processes and procedures we will be able to offer our clients and business partners numerous new services. The fundamental reason for moving to this system is to allow both business partners and the client to have online access to the account. Not only will you will be able to review key information regarding the policy such as current balances, drawdown information etc., but you can also complete tasks online using the system such as complete illustrations, request a transfer in and also commence the payment of retirement benefits process.

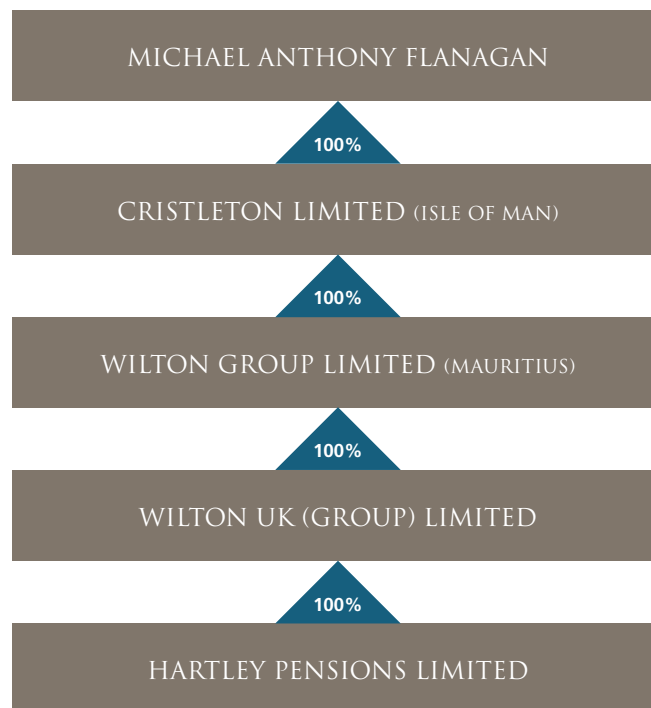




## CHARGING

We operate a transparent charging structure and do not have any 'hidden' fees. All our fees are detailed in the particular product charging sheet which can be found on our website. Our pension charges are reviewed annually to ensure that they remain competitive in the market and to ensure that our company operates on a sound financial footing. Any changes in charges are communicated to all our business partners 30 days prior to implementation. We are so confident about our customer service that we do not charge a transfer-out fee.

## ORGANAGRAM



## ANY FURTHER QUESTIONS?

### **Please get in touch:**

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