

# Compliance News – FOR IFAs

'We are committed to providing IFAs with a periodic free newsletter and value for money additional services – Please support us!'

## JUNE 2011 Edition

### Welcome to Compliance News

This publication is issued by Compliance News Limited for the benefit of IFAs and employed Compliance staff in the UK, particularly those working at directly authorised IFA firms. For a copy of all earlier editions please visit: <http://www.fsresourcing.co.uk/compliance-news.php>

### Background of the editor:

Phil Dibb worked at PIA/FSA from 1997 to 2002 and now runs his own Compliance Consultancy firm. He spends the majority of time training IFAs on compliance and T & C issues, in addition he is Chairman to 15 regional Compliance forums held around the UK and also a member of the Association of Professional Compliance Consultants.

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### Distribution:

This bulletin is now issued to over 16,000 IFAs who have been in contact with Compliance News since Phil Dibb left the FSA. The aim is to get the distribution up to 20,000. If this can be achieved, more free updates and assistance will be available to the readers. To this end, please would you ask any other IFAs you know to register for the bulletin by emailing [compliance@ifahelpline.co.uk](mailto:compliance@ifahelpline.co.uk)

### Compliance News Premier Service

IFAs can now subscribe to receive a wide range of **forms and templates** to assist with the running of their business. See page 8 for full details. All forms will be issued direct to subscribers and most are on a word document. We plan to issue a **minimum of 50** templates / forms during the next 12 months, from only £175 for the year. We hope this service will save a typical firm at least 50 hours each year and avoid 'reinventing the wheel'. Recently designed documents include:

Qualifications Summary	Oral Disclosure – various documents
Using ATR Profilers	Oral Disclosure Training Presentation
Fee Agreement	Wraps Powerpoint Presentation
CPD Focusing on Gap Fill	Gap Fill Template
Fact Find documents	Suitability letters (various)
	Knowledge tests

**Gaps 1-14, 36-39, 57, 58, 78 (VAT), 91-94, 104-109 + Many more.**

**We can help – see over**

Why not email [compliance@ifahelpline.co.uk](mailto:compliance@ifahelpline.co.uk) and receive it direct to your PC?

**Disclaimer:** Compliance News is a trading style of Compliance News Limited. Compliance News cannot be held responsible for the views and interpretations shown in this publication. Authorised firms remain responsible for complying with the FSA requirements and such obligations cannot be transferred to a third party. Errors and omissions excepted.

## 1. GAP FILL – VIEWS & OPINIONS

Over the last few weeks there have been various press releases on this topic. Whilst we do not wish to speak for the FSA, CII or IFP; we believe it is very important that everyone understands the importance of knowing why your own firm must have a gap-fill CPD policy. For the majority of existing IFAs, getting the RDR 'green-light' will mean a three-stage process:

1. Obtaining a level 4 qualification
2. Completing 109 point CPD Gap-Fill (CII Route)
3. Obtaining a 'SPS' (Statement of Professional Standing) – Issued by an FSA approved verifier.....

The main query is in relation to point 2, CPD gap-fill. Can this be just reading or should it be properly structured (an agreed learning outcome / detailed notes on the CPD / followed by a short test of some sort – known as validation)? Our opinion is 'yes' it should be structured (wherever possible), based on the FSA Professionalism paper – page 25/126. The FSA's recent Professionalism paper states ...(page 23 – 4<sup>th</sup> para).....'we reiterate that gap-fill should be structured, rather than unstructured, CPD. However, if structured CPD is not available to fill the gap identified, then an adviser may complete the gap by reading suitable material. We expect that such cases would be for a minority of gaps, if any.'

[http://www.fsa.gov.uk/pubs/policy/ps11\\_01.pdf](http://www.fsa.gov.uk/pubs/policy/ps11_01.pdf)

[http://www.fsa.gov.uk/smallfirms/your\\_firm\\_type/financial/rdr/qualification\\_gap\\_fill.shtml](http://www.fsa.gov.uk/smallfirms/your_firm_type/financial/rdr/qualification_gap_fill.shtml)

We have now run a series of successful Gap Fill one-day training sessions covering Ethics & Regulation (gaps 1-14). If you would like to register your interest for future sessions, please email [compliance@ifahelpline.co.uk](mailto:compliance@ifahelpline.co.uk) quoting GAP FILL in the subject box

## 2. THE NEED FOR GOOD QUALITY CPD DURING 2011 & 2012

Linking to the above point on the SPS, please can we ask that all advisers are reminded about the need to record and retain detailed CPD records. These are likely to be examined by any accredited body that is looking to issue

an adviser with a SPS. Poor CPD could mean a delay getting the adviser the required SPS. Premier Service subscribers have been issued with our new version of a CPD record sheet, which focuses on Gap Fill.

## 3. GAP FILL VALIDATION – Questions for each 'gap' to assist with showing structure.

We are in the process of producing a wide range of question and answer sheets for the most common gaps. Already completed are gaps 1-14 (Regulation & Ethics) and 78 (VAT). Currently in the pipeline are 57, 58, 66, 67, 82, 104 -109. In addition to the reading material out solutions also include a short test so you can prove a "validation" of your learning.

These documents will automatically be sent to Premier Service subscribers.

## 4. THE FSA GATHERING MORE INFORMATION ON FIRMS & ADVISERS

The FSA have recently issued a Consultation Paper (CP) to consider gathering more information from Authorised firms. This could include:

- Charging structures / remuneration models
- GPPP charging structures / fees
- Increased level of Complaints data and the requirement to name individual advisers with certain levels of complaints.

We would recommend that firms consider the CP and respond before 8<sup>th</sup> July 2011.

[http://www.fsa.gov.uk/smallfirms/resources/one\\_minute\\_guides/financial\\_advisers/rdr\\_data\\_cp.shtml](http://www.fsa.gov.uk/smallfirms/resources/one_minute_guides/financial_advisers/rdr_data_cp.shtml)

## 5. COMPLIANCE SOAP - SUMMARY ON A PAGE DOCUMENTS

We are in the process of completing our initial batch of 'SOAP – Summary On A Page' documents. These will cover the most common 10 product areas for IFAs and be a quick Compliance check sheet to make sure advisers address and document the key areas before submitting the business. We plan to issue these over the next three to four

weeks. They will be automatically issued to all current Premier Service subscribers. Initial summaries will be on the following areas:

- Income Drawdown
- New Personal Pension
- Investment Bond
- ISA Transfers

## 6. VAT – Would attending a training event / discussion help?

Many firms will not thank us for raising this topic, but VAT has become a very popular subject. In addition to advice only services IFAs provide "intermediary" services to their clients by acting between the client and the providers of financial products. As a general rule of thumb advice only services are fully VATable and intermediary services are exempt however, it is not always that simple and therefore it is important you can understand and identify which predominates in order to establish the VAT status of the service provided.

In addition, changes to business models and charging structures brought about by RDR also has the potential to affect the VAT position for IFAs.

It is very important that the Senior staff of your firm acknowledge the VAT related issues and take professional advice. Market intermediation / predominant service / advisory services are the areas you might be thinking about. Please do obtain specialist advice and consider what your own client service proposition documents state to clients.

Alternatively we are looking to set up a number of half day sessions around the UK with a VAT expert specialising in IFA services. In order for us to gauge the potential interest in this please e-mail [compliance@ifahelpline.co.uk](mailto:compliance@ifahelpline.co.uk) with "VAT forum / discussion" in the subject box.

## 7. NOTIFICATION OF COMPETENCE OF ADVISERS (CF30)

From July 2011, firms will be required to notify the FSA should 'Competence' and / or 'Ethical' issues arise for an Investment

Adviser (CF30). The link below gives more details, but this could include an adviser acting outside their own agreed scope.

<http://www.fsa.gov.uk/Pages/Doing/Regulated/Notify/competence/index.shtml>

The notification form can be found at:

[http://www.fsa.gov.uk/pubs/other/Competence\\_notification\\_form.pdf](http://www.fsa.gov.uk/pubs/other/Competence_notification_form.pdf)

## 8. AIFA – ONE HIT 'RDR' EXAM

For some IFAs who have struggled with the CII route, this 3 hour 15 minute typed exam is becoming a possible alternative. Costing £695- for non-members, it could be of interest. We want to hear from anyone who is

genuinely interested in such a route. Our plan would be to run a two-day 'crammer' course before the exam on the third-day. To register your interest please email with 'AIFA Crammer' in the subject box.

<http://www.aifa.net/qualifications/>

## 9. BRIBERY ACT / GIFTS REGISTER / COMPANY POLICY ON CONFLICTS OF INTEREST

The new Bribery Act comes into force on the 1<sup>st</sup> July 2011. The Act aims to consolidate and simplify existing legislation against bribery and corruption in all areas of business.

Previously limited to transactions occurring only in the public sector the new legislation is now much further reaching due to the introduction of the new corporate offence of failure of commercial organizations to prevent bribery. In essence therefore, this now requires all businesses to consider how the

requirements of the new Act could affect them.

To help firms in this area, we are now finalising documents to cover a Conflicts of Interest policy and a gifts register. Firms will be required to make sure all staff are aware of the broad outline of the act and their own responsibilities. As a minimum, firms should be considering their own policy on gifts / inducements and general acceptance / provision of entertaining.

## 10. RECORD KEEPING – WHICH REGISTERS DO YOU KEEP?

We have recently completed a project on “Registers for directly authorised firms”. In total we have identified 36 popular registers which IFA firms use. IFA staff will be well aware of the regulatory importance of record keeping but what actually is mandatory and what is just “nice to have”?

Following our research we have designed a spreadsheet of the registers which details those or which categorises those, which are an FSA requirement; those which fall within

“Compliance – Systems and Controls” and others which are good compliance or business practice for relevant firms. In addition all register proformas have been updated.

To obtain a copy of the register spreadsheet AND the up-dated forms please subscribe to the Premier Service (see back page). Existing subscribers will automatically receive these documents by the 23 June 2011.

## 11. ARE YOU TAKING ADVANCED / AF PAPERS DURING 2011 & 2012?

We continue to work with Mark Thewlis and Steve Davis who are established and well respected technical trainers, travelling throughout the UK. We are now planning the next 12 months of AF revision days. If you

would like to be included on our AF revision day training emails, please email us with “AF Training” in the subject box. There is no obligation. We will keep you updated with our revision planning.

## 12. COMPLAINTS HANDLING – FINANCIAL OMBUDSMAN SERVICE

The Financial Ombudsman Service (FOS) has recently issued its annual report for 2010. The report shows that FOS deals with approximately 4000 complaints each week – indeed a startling figure in respect of dispute resolution between consumers and financial institutions and one that we should all be concerned about.

However, the report goes on to state that only 1.5% of complaints dealt with relate to advice provided by IFAs. Whilst we acknowledge that figures are distorted by the PPI mis-selling scandal we believe that this is a figure that the IFA community should be proud to shout out about.

The relevant statistics can be found on page 116 of the FOS report which can be viewed at the following link: <http://www.financial-ombudsman.org.uk/publications/ar11/index.html>

### 13. FSA DELAYS PUBLICATION OF NEW PLATFORM RULES

As part of the RDR project new rules were expected this month in relation to platforms. It is now anticipated that these will be published in the third quarter 2011.

Whilst the consultation is extensive the main issue for IFAs is whether those advisers who

use a single platform can call themselves independent and whether it will be necessary to demonstrate that the selection of a platform ahead of others was specifically in “the client’s best interest”.

### 14. REMOTE FILE CHECKING SERVICE – A flexible alternative for IFA firms.

Through our sister company Just CRS Limited, we are able to provide a remote file checking service to IFA firms on a ‘pay as you go’ basis.

The costs are: £65 per remote client file review with summary sheet (excluding multiple transaction files or higher risk cases

such as drawdown, structured products or PP switching) or £95 per drawdown / PP switching (up to 3 into 1) remote file check.

Please contact Katherine Horgan at [katherine@justcrs.co.uk](mailto:katherine@justcrs.co.uk) or 07815 767204.

### 15. HOW DO YOUR “PENSION TRANSFER SPECIALISTS” SHOW THEY MAINTAIN COMPETENCE?

We have updated our Pensions Technical test paper to assist our subscribing firms show how their PTS/G60 staff maintain competence. Whilst still pending Royal Assent (expected July 2011) the provisions in respect of retirement options within the Finance Bill 2011 largely took effect from 6 April 2011.

Legislative changes have brought about fundamental reform of the pension regime and IFA firms should ensure and demonstrate that pension transfer specialists maintain the knowledge and skill base to fulfil their role.

We are able to provide to subscribers of the Premier Service an assessment which tests current knowledge in relation to pensions

technical / occupational issues. Premier Service subscribers will automatically receive a copy of the test paper by Friday 23<sup>rd</sup> June 2011. To allow internal “tests” to be sat, we will not publish the specimen answers until Monday 4<sup>th</sup> July 2011.

**Marking your paper – Can we help? We also provide an additional “marking” service with a summary feedback email for each individual sitting the paper. The additional cost for this “marking service” is £75 per paper.**

To register your interest please e-mail [compliance@ifahelpline.co.uk](mailto:compliance@ifahelpline.co.uk) with “PTS assessment” in the subject box.

### 16. UNREGULATED COLLECTIVE INVESTMENT SCHEMES – FOS VIEW

The Ombudsman annual report for 2010 has highlighted that complaints are being received in respect of the transfer of personal pensions into SIPPs. Whilst much thematic work has been undertaken in respect of pension switching a fundamental area of concern expressed by the pension ombudsman at FOS is in relation to the establishment of the underlying investment via unregulated collective schemes (UCIS) and the suitability

of such arrangements given the customers retirement timescales and risk profile.

In our opinion this is a potential minefield with the perception that many IFAs do not have sufficient understanding of the risks to the customer attached to these schemes nor are they maintaining adequate records to justify the suitability of a scheme for a customer.

The FSA has previously issued guidance on this topic, which is summarised in this factsheet.

[http://www.fsa.gov.uk/smallfirms/your\\_firm\\_type/financial/pdf/ucis\\_factsheet.pdf](http://www.fsa.gov.uk/smallfirms/your_firm_type/financial/pdf/ucis_factsheet.pdf)

In addition they have issued a good and poor practice summary:

[http://www.fsa.gov.uk/smallfirms/your\\_firm\\_type/financial/pdf/ucis\\_report.pdf](http://www.fsa.gov.uk/smallfirms/your_firm_type/financial/pdf/ucis_report.pdf)

Due to the complex nature of these schemes we recommend that IFAs obtain specific guidance. We have specialist contacts who are able to provide advice to directly authorised IFAs should they require it.

## 17. CLIENT ASSETS – REPORTING & CONTROLLED FUNCTIONS

Following a number of financial crises in global economies together with a number of high profile insolvency cases – most notably Lehman Brothers – the FSA has sought to further improve client protection and financial stability through the publication of the Client Assets Sourcebook (Enhancements) Instrument.

This is aimed at firms who are authorised to hold client assets and money permissions.

Medium and large firms are required to appoint a Senior individual with the controlled function CF10a – CASS operational oversight

function. Relevant firms have been contacted by the FSA by e-mail to advise that applications can be made via [www.fsa.gov.uk/clientassets](http://www.fsa.gov.uk/clientassets) from 1 May 2011 with the expectation that all firms should have an appointed individual in place by 1 October 2011.

From 4 July 2011 the FSA will be emailing CASS small firms requesting responses to specific questions in relation to their custody of client money and assets. Responses are required by 31 July 2011.

A summary of the FSA's policy statement can be found at:

[http://www.fsa.gov.uk/pubs/policy/ps10\\_16\\_newsletter.pdf](http://www.fsa.gov.uk/pubs/policy/ps10_16_newsletter.pdf)

## 18. SUPERVISOR TRAINING COURSES

In association with our links to the New Model Business Academy (NMBA) and Simply Biz, we have a limited number of places available for a one-day workshop aimed at developing the T&C and supervisory skills of existing T&C specialists, business owners and compliance staff within IFA firms. Courses are to be held at the following locations:

- Hitchin, Hertfordshire – 20 June 2011
- Reading, Berkshire – 21 June 2011
- Exeter, Devon – 22 June 2011
- Birmingham, Worcestershire – 24 June 2011

The learning approach will be based on facilitator presentation, structured discussion and debate and practical examples.

NMBA are able to provide this training at a cost of £135 + VAT which includes a full day session with lunch. To register your interest please contact NMBA [t.prest@nmba.info](mailto:t.prest@nmba.info) or [n.barber@nmba.info](mailto:n.barber@nmba.info) with "Supervisor Training" in the subject box along with your preferred location or telephone: 01484 439203 or 01484 439161.

Should none of these dates be convenient, please register your interest for future dates by emailing [compliance@ifahelpline.co.uk](mailto:compliance@ifahelpline.co.uk) with "Supervisor Course" in the subject box.

## 19. PROCEDURES REVIEW

When was the last time you reviewed your internal procedures? In our experience firms establish procedural documents – often on a “one-size fits all basis” but then do little to update them on an on-going basis to ensure that they continue to be appropriate to the business.

We can work with you to up-date your procedure documents in order to ensure that they are bespoke to your firm.

This service is available at a cost of £395. To register your interest please e-mail [compliance@ifahelpline.co.uk](mailto:compliance@ifahelpline.co.uk) with “Procedure Review” in the subject box.

## 20. RETAIL DISTRIBUTION REVIEW – TO DO LIST

The latest RDR newsletter (3 pages) was issued on 3<sup>rd</sup> June 2011 and should be read by all Senior managers within the firm. It is clear that with only 18 months to go to the RDR deadline, the FSA has an expectation that firms should be well on the way with reviewing their business models and implementing change. As a result firms should now be:

- Using internal MI to determine the most suitable service propositions for their customers.
- Considering different charging structures for different client profiles.
- Working with product providers to see how they will accommodate proposed business models.
- Reviewing the firm’s T&C regime in order to ensure that advisers will be able to meet the competence requirements of RDR and that the firm is able to meet new reporting requirements, which start in July 2011.

<http://www.fsa.gov.uk/pubs/newsletters/rdr2.pdf>

## 21. COMPLAINTS HANDLING / NEW FOS LIMITS / REPORTING

Following consultation via CP10/21 the FSA has issued it’s proposed new complaints handling rules. These are outlined in the attached document (68 pages).

<http://www.fsa.gov.uk/pubs/cp/cp11/10>

In summary the rules promote:

- Rules to make sure that firms handle and resolve complaints with due regard to the interests of the customer;
- Firms to identify a senior individual responsible for complaints handling;
- Guidance to promote greater understanding in respect of root cause analysis;
- Guidance requiring firms to take into account previous FOS decisions.

The statement also confirms the increase to FOS awards from £100,000 to £150,000.

In addition the FSA are continuing their focus on the professional standards of advisers. They are therefore proposing a reporting requirement for firms to alert them when an adviser receives three or more complaints in any 12 month period or any single complaint with a claim in excess of £5,000. One concern many have had to date is when does alleged poor advice become reportable? (Innocent until proven etc.) If a client complained about losing £5001 on an investment, would this individual adviser have their name sent to the FSA even though the firm believed the case was unfounded / weak and the FOS would find in the advisers favour?

We are to draft a response to this Consultation Paper on this basis as it is important the FSA understand these views. Our subscribers will automatically receive a copy of our proposed response.

## 22. ADVISERS MOVING TO SUPER INTRODUCERS / AMBASSADORS

Through our own networking, we are becoming increasingly aware that the FSA (and possibly PI insurers) are taking an interest in those who have decided not to take exams and are to become an 'introducer' post

RDR. It is very important that such advisers understand the restrictions they face. Advice / recommendations / promoting retail investments require those individuals to meet the FSA requirements.

## 23. COMPLIANCE NEWS PREMIER SERVICE – The annual costs is per firm

As mentioned, this is a service offered by Compliance News, which was prompted by several IFAs who contacted us following the first newsletter, requesting most of the forms. We believe this service will save a typical IFA firm at least 50 to 80 hours per year.

### **MOST DOCUMENTS ARE SENT ELECTRONICALLY ON 'WORD'**

**Benefit:** You have access to **all the forms** we have, at no extra charge. We will send a wide range of IFA forms / guidance on a regular basis to you in 'word' document format. In addition, wherever possible we will try and assist with individual requests.

**To register:** Please complete the back page with your details, enclosing a cheque made payable to Compliance News Limited.

The following is a list of just some of the documents, which will be issued.

TCF forms – Too many to list  
Generic Knowledge test for advisers  
Reference Request forms  
Conflicts of Interest Policy  
Data Security documents  
Copies of relevant FSA guidance  
Anti-Money Laundering Annual test  
Updated Terms of Business letters (RCA)  
Compliance / Risk Mitigation plan,  
Compliance Audit forms,  
Updated Observation forms  
Adviser Role / Job Description templates  
Risk Assessment / calculator of adviser,  
Fit & Proper adviser annual declarations,  
Client agreements / Fee agreements,

Mortgage Regulation checklists,  
Customer Satisfaction Surveys,  
Maintaining Competence (T & C) form,  
Suitability Letter templates,  
File completeness checking forms,  
Blank reference request forms, diary template,  
Disaster Recovery / Continuity plan,  
Provider Research summary forms,  
Recruitment checklists  
TCF Visit – IFA feedback from FSA  
New IDD (SCDD) documents  
Mortgage advice/file checking forms  
GABRIEL help  
Personal account dealing declaration  
Compliance Board Report templates,

*"Whilst the above list may appear to be comprehensive the real benefit to most subscribers is being able to email a request and receive a template. We are generally able to help with 90% of all requests"*

### **PRICES HELD UNTIL 30<sup>TH</sup> JUNE 2011**

On 1<sup>st</sup> July 2011 there will be a small increase in subscription costs for NEW subscribers. The costs shown on the last page are only available for payments received by Thursday 30<sup>th</sup> June 2011.

### **Compliance News Premier Service – Any questions?**

If you cannot decide whether this service will be of benefit, or if you have any questions as to how many documents you will get / have access to, we will be glad to call you to answer any queries. Please send a quick email to the address below with 'Premier News Enquiry' in the title box and we will call you.  
[compliance@ifahelpline.co.uk](mailto:compliance@ifahelpline.co.uk) Tel: 0113-2589878

## 24. COMPLIANCE NEWS PREMIER SERVICE – HOW TO SUBSCRIBE

**SHOULD YOU WISH TO SUBSCRIBE TO THE COMPLIANCE NEWS PREMIER SERVICE OR REGISTER YOUR INTEREST FOR ANY OTHER SERVICE, PLEASE COMPLETE THIS SHEET AND POST TO:**  
**Compliance News Limited, 19 Henley Close, Rawdon, Leeds, LS19 6QB**  
[compliance@ifahelpline.co.uk](mailto:compliance@ifahelpline.co.uk)

**Compliance News Premier Service (cost for 12 month membership):** This service provides copies of all the popular documents (200+) we offer, mainly in 'word' format.

**SUBSCRIBERS TO THE PREMIER SERVICE WILL AUTOMATICALLY BE ENTITLED TO ALL THE DOCUMENTS DETAILED AT NO EXTRA COST (PLUS OTHERS WE DESIGN DURING YOUR SUBSCRIPTION).**

<b>Compliance News Premier Service – Small IFA firms with 1 to 10 advisers.</b> Firms who do not have more than 10 IFAs or 3 Appointed Rep's, do not provide Compliance/Commercial services to other IFAs and agree not to pass on the material to external firms.	<b>Cost £175</b> Please tick
<b>Compliance News Premier Service – IFAs with 11 to 25 advisers and up to 9 AR's.</b> Firms who do not have more than 25 IFAs or 9 Appointed Representatives, do not provide Compliance / Commercial services to other IFAs and agree not to pass on the material to external firms.	<b>Cost £275</b> Please tick
<b>Compliance News Premier Service – Large IFAs, Networks and other Compliance consultancies.</b> Please contact us, as costs vary depending on size and activity.	<b>Please contact us</b>

Please note that the prices quoted above are for IFA firms, which are directly authorised with the FSA. Compliance News Limited reserves the right to increase the prices for other organisations, such as networks and those who also provide compliance support, that may require copies of certain documents.

**Please make cheques payable to Compliance News Limited and post to the address at the top of this form. An invoice marked as 'paid' will be issued with all orders.**

**Name/Contact:**

**Firm:**

**Address:**

**Are you an authorised firm? Yes / No**

**Tel:**

**Email:**

Should you wish to receive further information on a particular topic, please complete the form below.

Compliance News – Additional Services			
	Tick (☑)		Tick (☑)
Gap-Fill 1 – 14 Course		Can Compliance News provide you with a bespoke quotation?	
TCF planning / support		PPP Switching Review Work	
Variation of Permission / FSA New Authorisation assistance		Annual knowledge tests & marked papers / providing feedback service.	
Do you want bespoke Compliance Procedures ?		T & C Supervisor / Refresher Course	

**Name:**

**E-mail:**

**Firm:**

**FSA Number:**