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**COMPLETE**

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**Q1** Overall, do you agree or disagree with [standard 1] and proposed commentary? **Agree**

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**Q2** Please provide any comments on [standard 1] and the proposed commentary. **Respondent skipped this question**

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**Q3** Overall, do you agree or disagree with [standard 2] and proposed commentary? **Agree**

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**Q4** Please provide any comments on [standard 2] and the proposed commentary.

Perhaps consider that one needs a code of ethics, this might be through a professional body or bodies

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**Q5** Overall, do you agree or disagree with [standard 3] and proposed commentary? **Agree**

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**Q6** Please provide any comments on [standard 3] and the proposed commentary. **Respondent skipped this question**

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**Q7** Overall, do you agree or disagree with [standard 4] and proposed commentary? **Respondent skipped this question**

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**Q8** Please provide any comments on [standard 4] and the proposed commentary.

The example given would I hope suggest that no replacement takes place until the new case is underwritten and accepted on terms that are equal or better to existing cover. The adviser hopefully explains why the existing cover might be replaced with new business (better cover or more cover, premium savings, multiple product discounts, removal of terms or loadings (occupational, recreational or perhaps improved health)).

In the above case the adviser seems unclear on the existing policy so I have major concerns as to how they might recommend an alternative product?

I am wary of any implication in the above example of replacement before terms are clear for the new product.

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**Q9** Overall, do you agree or disagree with [standard 5] and proposed commentary? **Respondent skipped this question**

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**Q10** Please provide any comments on [standard 5] and the proposed commentary. **Respondent skipped this question**

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**Q11** Overall, do you agree or disagree with [standard 6] and proposed commentary? **Neither agree nor disagree**

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**Q12** Please provide any comments on [standard 6] and the proposed commentary.

There is an issue around what is secure. How do we ensure any processes are secure. If Government Departments and Large Corporations can be hacked, how can financial services providers ensure that CRM systems some servers are based abroad (Amazon), or One Drive or other Servers are secure.

This and security for paper records that may be stored in a locked office with limited access, but what might be deemed reasonable efforts to secure data, and how long is an agreement to provide services from a brokerage deemed to be an "engagement" ? Especially where such documents are the brokerages record of its services and compliance records for good advice process and to audit?

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**Q13** Overall, do you agree or disagree with [standard 7] and proposed commentary? **Agree**

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**Q14** Please provide any comments on [standard 7] and the proposed commentary. **Respondent skipped this question**

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**Q15** Overall, do you agree or disagree with [standard 8] and proposed commentary? **Agree**

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**Q16** Please provide any comments on [standard 8] and the proposed commentary. **Respondent skipped this question**

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**Q17** Overall, do you agree or disagree with [standard 9] and proposed commentary? **Agree**

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**Q18** Please provide any comments on [standard 9] and the proposed commentary. **Respondent skipped this question**

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**Q19** Overall, do you agree or disagree with [standard 10] and proposed commentary? **Agree**

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**Q20** Please provide any comments on [standard 10] and the proposed commentary. **Respondent skipped this question**

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**Q21** Overall, do you agree or disagree with [standard 11] and proposed commentary? **Agree**

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**Q22** Please provide any comments on [standard 11] and the proposed commentary. **Respondent skipped this question**

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**Q23** Overall, do you agree or disagree with [standard 12] and proposed commentary? **Agree**

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**Q24** Please provide any comments on [standard 12] and the proposed commentary. **Respondent skipped this question**

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**Q25** Is there anything missing from the draft Code? **No**

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**Q26** If you answered yes, what is missing? **Respondent skipped this question**

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**Q27** Do you have any feedback on the examples, or suggestions on other examples that should be included in the draft Code?

Nom nated adv sers for a FAP I be eve shou d have an ob gat on to be comm tted to comp et ng a eve f ve d p oma over a per od of t me, even f they are w th n an organ sat on prov des an aud t process

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**Q28** Is there anything else you want to say?

The ssue of comp ance costs for a FAP need to take nto account sma er pract ces that m ght have f ve to ten adv sers, as aga nst and producer group w th s x hundred. A t ered, or stepped system to a ow for grow ng pract ces who recru t and br ng new adv sers nto a system.

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**Q29 Name**

Adrian Phillips

**Q30 Your role or professional title**

Director Phoenix Adviser Group Ltd.

**Q31 Individual or organisational submission**

**This is an individual submission and not on behalf of an organisation**

**Q32 If you give financial advice...**

**I am a RFA**

**Q33 My organisation or I give the following types of advice...**

**Life and/or health insurance**

**Q34 Organisation Name**

Phoenix Adviser Group Ltd

**Q35 Type of organisation**

**Independent adviser**

**Q36 Size of organisation**

**Small firm (1-10 staff)**

**Q37 If there are other things we should know about you or your business that would provide context to your answers, please provide details below.**

We are recruiting and training new advisers into personal risk advice and refer externally for F and G business and provide class on only advice for KS. I as Director am keen to see good standards and develop our business as a profession. We are a small team currently of five RFAs.

I have had thirty seven years experience in the industry as an adviser, sales manager, business development manager, and other roles here and in the UK

**Q38 Please indicate whether your submission contains any information that is confidential or whether you do not wish your name or any other personal information to be included in a summary of submissions.**

**Respondent skipped this question**

**Q39 Please provide your contact details (email and/or phone number) This is the only question that requires an answer. This information would not be released publicly. We may get in touch with you in order to help us understand particular points from your submission.**

s 9(2)(a)