

# SPRING CUSTOMER TREATMENT POLICY

JANUARY 2016

## OBJECTIVE

The Company contracts to train client delegates in Customer Service. Therefore the Company must ensure such training meets the standards set by Clients for fair treatment of their customers. E.g. in the case of, for instance, JPMC, our Customer Service training and coaching must take into account the standards set by JPMC for customer treatment by their staff whom we train and coach.

## KEY PRINCIPLES

As deliverers of training and coaching, Company Representatives must be responsible for identifying and managing any risk to end customers of our clients that delegates may bring to the table or may arise as a result of our training or of delegates' interpretation of them.

It is essential that all Representatives be sensitive to achieving moral, fair and appropriate outcomes of our training and coaching both for our delegates and our delegates' customers.

## PROCESS

Design. Company personnel who design training interventions and delivery methods and written materials must ensure they adhere to all legal and regulatory requirements that are relevant to achieving the right outcome for the Client's customers. For example, in the case of JPMC, Principle 6 of the FSA Principles which requires that firms pay due regards to the interests of their customers and treats them fairly. They must also ensure all materials are clear, consistent, aligned with the Client brand where appropriate and free of jargon.

Delivery. Company Representatives delivering training must ensure our materials address customer interactions as appropriate for delegates and to work assiduously to be fully understood by them. Representatives must be aware of possible misinterpretation by delegates of our material and methods that might lead to unfair treatment of Client customers. To achieve this, they must obtain a working understanding of customer service interactions and responsibilities undertaken by delegates in their care. To mitigate risk of misinterpretation, Representatives must do all they can to ensure delegates can demonstrate effective use of our materials, as they may affect written and verbal communications with customers and specifically in respect of fair treatment of customers.

### Awareness, Training and Monitoring

The Company must include the requirements of this Policy in all training sessions which must take place at least once per year and whenever new materials and/or methods, or changes to same are added to our training materials portfolio.

Our lead Representative on any training programme or event must, from time to time and always following the completion of a programme, seek and obtain from the relevant Client contact written feedback as to the efficacy of the training including identification of any unfair customer outcomes.



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In the event of unfair outcomes, the appropriate Company Director must address them promptly, identify the root cause and must ensure that the Client contact is satisfied with any changes to materials and methods made. A record must be kept of every such event.



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