

## **BROKER VERSION**

### **Insurance Distribution Directive - Product Oversight and Governance**

Following the implementation of the Insurance Distribution Directive on 1<sup>st</sup> October 2018 we would like to share our approach to Product Oversight and Governance to demonstrate the way we design, monitor, review and distribute our insurance products.

#### **Product development process**

The product development process has been designed to ensure that we have a consistent approach to the development of new or significantly adapted products and protects against our products having any potential to cause customer detriment. The process comprises 6 stages – initial concept; business case development; detailed design phase; build phase; launch; and post implementation review to ensure the product is performing as expected. Each project will have a core team of individuals assigned to it to ensure a balanced approach to the development.

#### **Product review process**

The product review process has been designed to ensure that we regularly measure our products against any risk of customer detriment and ensures we have the necessary controls in place to know if and when we need to take remedial action. Products are monitored on an ongoing basis and assessed against a set of Management Information (MI) metrics to assess performance.

#### **Information from brokers and other distribution partners**

As we carry out these reviews, we may request information from brokers to be able to evidence that our products are being distributed correctly - examples of this could be evidence that the product has been sold to the right target market or complaints received relating to the product. In most instances we will hold this data already on our systems, but there will be occasions when we may request it from relevant brokers.

#### **Product approval process**

One part of the wider information we will provide to brokers at the launch of a new or significantly adapted product will be the product approval process. This will include information regarding the target market, distribution channels and the monitoring of the product. This information should provide a clear overview of the product and the development that has taken place.

The product approval process will only be for new and significantly adapted products released after 1st October 2018. We will not be providing this information for existing products before this date as whilst they will have been in line with other regulation and guidance (The Responsibilities of Providers and Distributors for the Fair Treatment of Customers (RPPD) and Insurance Mediation Directive (IMD)) this information is in a differing format. Existing products will however be migrated into the current product approval process as and when they reach a scheduled review point or when they require significant adaptation.

If you do have any further questions, please contact your Ecclesiastical representative.