**Consumer Duty Management Information Matrix**

These are possible data sets you may wish to collect. You don’t have to collect it all. The data we think is critical is in red.

| **MI** | **Control evidences** | **Suggested frequency** |
| --- | --- | --- |
| **GOVERNANCE** |
| Client categorisation and service matrix (accumulation / decumulation) | Adherence to contractual remit | Annually |
| Per client advice fee register | Delivering fair value to clients | 6-monthly |
| Breaches register (all systems failures) | Management of failure to deliver predictable client outcomes | Monthly |
| Complaints (register) | Management of failure to deliver expected client outcomes | Whenever there is an ongoing complaint |
| Clients lost | Client servicing | Annually |
| Vulnerable clients register | Service delivery for these clients | Monthly |
| **ADVICE** |
| File Reviews (register) | Quality of advice;  | 1x / 2x a year |
| Execution Only (NB register) | Management of failure to deliver advice to clients | Annually |
| New business register | Quality of advice, outcome based delivery to clients | Quarterly |
| High risk business (NB register) | Management exposing clients to risk | Monthly |
| Annual client review (register) | Adherence to contractual remit | Monthly |
| Separately drawdown review register | Ensuring clients sustainable income targets are being met | Quarterly |
| Risk profile per transaction register | Management exposing clients to necessary levels of risk | Annually |
| Non-core advice (NB register) | Identification of product spread – delivery to clients | 6-monthly |
| Investment fund reviews – portfolio and watch list | Management exposing clients to necessary levels of risk | Annually |
| Product Research Reviews (including platform) | Product remains fit for purpose | Annually |
| Portfolio performance KPIs (volatility, returns, costs) | Portfolios delivering as expected – managing client risk and expectations | 6-monthly |
| Clients taking an income from investments | Identification of clients to monitor for income sustainability | 6-monthly |
| Clients with cash flows  | Identification of clients objectives being met | Annually |
| **STAFF & TRAINING** |
| Staff ongoing training (register) | Staff competence, advice delivery to clients | As delivered |
| Adviser CPD control register | Staff competence, advice delivery to clients | 6-monthly |
| Adviser observations | Management of client relationships and adviser capability | 6-monthly |
| Staff FIT assessments | Staff financial probity, conduct and leading to good client relations | Annually |
| **FINANCIAL** |
| Clients ongoing fees against model | Identification of clients with deals and justifying them | Annually |
| Cashflow vs regulatory capital requirement | Business risk – staying in business | 6-monthly |