Criterion 1a: *'Our firm publishes a customer-centric purpose statement that includes organisational values and is aligned with the CII Code of Ethics and the FCA's Consumer Duty outcomes'*

Criterion Overview

This criterion assesses how clearly your firm defines and communicates its purpose, values, and ethical commitments, and how well these align with the CII Code of Ethics and the FCA's Consumer Duty outcomes. The assessment examines whether your published purpose statement places customers at the centre of your firm's mission, demonstrates a commitment to understanding their needs, and outlines the standards of behaviour and organisational values that guide day-to-day activity.

A strong submission will show that the purpose statement is authentic, easy for customers and stakeholders to access, and consistently reflected across both internal policies and public-facing materials. It will also demonstrate clear reference to (or alignment with) the requirement to act in good faith, avoid foreseeable harm, and enable and support customers to pursue their financial objectives. Assessors will consider how well the statement is lived in practice, including links to internal governance, business ethics, and behavioural expectations for staff.

Suggested Evidence

The evidence you provide should help demonstrate how your purpose and values are defined, published, and embedded within your firm. The list below outlines the types of documents and information that can support your submission. You do not need to supply every item listed, but the evidence should be relevant, clearly presented and sufficient to illustrate alignment with the CII Code of Ethics and FCA Consumer Duty outcomes.

- [ ] Link to the publicly accessible purpose/mission statement (e.g., website, client brochure, onboarding materials).
- [ ] A purpose statement that refers to customer focus, firm values, ethical commitments, and meeting customer needs.
- [ ] Supporting documentation demonstrating how the statement is promoted to clients and stakeholders.
- [ ] Internal policy documents showing that the purpose statement is reflected consistently in operational practice.
- [ ] Evidence that staff guidance, conduct expectations, or induction materials align with the published purpose and values.
- [ ] Examples demonstrating how the purpose statement has informed decisions or customer communications.
- [ ] Governance or oversight documentation illustrating how purpose is monitored or reinforced.
- [ ] Extracts demonstrating alignment with the FCA Consumer Duty outcomes and CII Code of Ethics.

Success Criteria

All submissions should include:

- A clear, customer-centric purpose or mission statement that reflects the firm's commitment to understanding customer needs.
- Explicit organisational values that align with the CII Code of Ethics and the expectations of the FCA Consumer Duty.
- Clear demonstration that the firm has considered both the Consumer Duty outcomes and the CII Code of Ethics when developing the statement.

A good submission will include:

- A well-formed, customer-centric purpose statement demonstrating an understanding of customer needs and the firm's responsibility to meet them.
- Values that emphasise ethical conduct, professionalism, and fair outcomes.
- Consistency between public-facing statements and internal policy documents.
- Evidence that the statement is consistent with internal policies, not contradicted by them, and accurately reflected in day-to-day behaviours.

An excellent submission will include:

- A well-articulated, prominently published purpose statement that is clearly aligned to the FCA Consumer Duty outcomes and CII Code of Ethics.
- Clear demonstration that the purpose statement is embedded across the business and underpinned by relevant policies, processes, and staff behaviours.
- Strong examples demonstrating how the purpose has influenced decision making or driven measurable improvements.

Key Considerations

Ensure the statement is genuinely customer-centric and clearly reassures customers that the firm seeks to understand their needs and deliver appropriate, ethical outcomes.

Assessors will check for alignment between external messaging and internal documentation.

Consider whether the statement visibly reflects the Consumer Duty and the CII Code of Ethics. Ensure the statement is accessible and not just an internal document.

Provide examples of how the purpose influences behaviours, culture, or governance.

Firms without a standalone mission/purpose statement may rely on policy extracts, but this is rarely as strong as a clear published statement.

Firms may find it useful to reference the CII Code of Ethics when reviewing or refreshing their statement.

Criterion 1b: ***'Our firm actively signposts relevant guidance, other products and services that meets our customers' needs, not just what we would prefer to sell to them'***

Criterion Overview

This criterion assesses how your firm ensures that customer needs are placed ahead of commercial preference when providing information, guidance or services. Assessors will look for evidence that the firm is transparent about what it can and cannot provide, and that customers are supported to access suitable alternatives where the firm's own products or services are not the best fit.

A strong submission will demonstrate that customer needs are assessed honestly and holistically, and that the firm actively signposts relevant guidance, products or external services when appropriate. This includes situations where customer preferences, ethical considerations or specific circumstances mean that another provider or solution would better meet their needs.

The customer outcome is confidence that the firm acts in the customer's best interests, providing suitable information and support rather than promoting products or services based on self-interest.

Suggested Evidence

The evidence you provide should demonstrate how your firm identifies customer needs and signposts appropriate solutions. You do not need to supply every item listed, but evidence should be relevant, clearly presented and sufficient to illustrate a customer-first approach.

- [ ] Examples of how customers are signposted to alternative guidance, products or external providers where appropriate.
- [ ] Evidence of processes used to assess customer needs before recommending products or services.
- [ ] Public-facing information explaining what products and services the firm does and does not offer.
- [ ] Referral or signposting policies outlining how and when customers are directed to third-party providers.
- [ ] Information about how the firm assesses the suitability and credibility of external partners.
- [ ] Examples demonstrating how ethical preferences or stated customer needs influence recommendations.

Success Criteria

All submissions should include:

- Clear, accessible information about the firm's products and services and the limits of what it can provide.
- Evidence that customer needs are assessed before recommendations are made.
- Examples showing that customers are signposted elsewhere when the firm cannot meet their needs.

A **good** submission will include:

- Plain-English guidance explaining how customer needs are prioritised over commercial interests.
- Clear transparency about what the firm does and does not offer, helping customers assess whether the firm is a suitable fit.
- Evidence of effective signposting arrangements, such as public-facing information that explains how and when customers may be referred to alternative providers.

An **excellent** submission will include:

- Proactive, holistic assessment of customer needs that identifies when the firm may not be the right provider.
- Established referral relationships or partnerships with trusted providers offering services the firm does not.
- Evidence that external providers are assessed for suitability and credibility before referrals are made.
- Examples demonstrating how signposting has resulted in better customer outcomes, even where this meant losing a potential sale.

Key Considerations

Firms should consider suitability beyond their own product range, including customer preferences, ethical considerations and specific circumstances.

Signposting should be proactive and based on assessed needs, rather than driven solely by customer request.

Assessors may consider complaints or regulatory findings linked to unsuitable sales as part of this criterion.

Information should be current, accessible and easy for customers to understand.

Handy tip: Where referrals are made, briefly explain how the firm ensures the alternative provider is appropriate and reputable.

Criterion 1c: *'Our firm has training and reward structures that enable and empower our employees to ask open questions and help find solutions'*

Criterion Overview

This criterion assesses how your firm creates an environment that encourages employees to raise questions, share ideas and identify concerns. These behaviours are supported through appropriate training and reward structures that encourage openness and constructive challenge. Assessors will look for evidence that staff feel able to speak up, understand how to do so, and trust that their input will be listened to and acted upon.

A strong submission will demonstrate that employee empowerment is practical and meaningful, with clear routes for raising concerns, encouragement to challenge constructively, and recognition for behaviours that support customer-focused outcomes. The customer outcome is better service and protection, achieved through an organisational culture where staff contribute to identifying issues early and helping to develop effective solutions.

Suggested Evidence

The evidence you provide should demonstrate how your firm enables and rewards open questioning and solution-focused behaviour. You do not need to supply every item listed, but evidence should be relevant, clearly presented and sufficient to illustrate that these behaviours are trained, supported and recognised in practice.

- [ ] Training that supports ethical behaviour, open questioning and raising concerns (e.g. ethics, whistleblowing, vulnerable customers, conflicts of interest).
- [ ] Clear processes for raising concerns or ideas, such as whistleblowing or speak-up arrangements.
- [ ] Evidence of reward or recognition structures linked to firm values and behaviours.
- [ ] Manager training on receiving, handling and acting on concerns raised by staff.
- [ ] Examples of recognition schemes (e.g. values awards, team recognition, performance discussions).
- [ ] Evidence of employee feedback or surveys showing confidence in raising issues.
- [ ] Case studies demonstrating how employee input led to change or improvement.

Success Criteria

All submissions should include:

- Training that helps employees understand how and when to raise questions or concerns.
- Clear, accessible routes for raising issues, with reassurance that staff will not be penalised for speaking up.
- Evidence that employee input is listened to and considered.

A good submission will include:

- A culture that encourages questioning and ethical challenge, supported by relevant training and policies.
- Well-defined speak-up or whistleblowing processes that are easy to find and understand.
- Reward or recognition approaches that reinforce behaviours aligned to firm values, such as openness and customer focus.
- Evidence that managers are equipped to receive and act on concerns raised by staff.

An excellent submission will include:

- Leadership behaviours that promote psychological safety, with senior leaders visibly encouraging openness and sharing learning from mistakes.
- Reward structures that recognise early identification of issues and constructive challenge, not only positive outcomes.
- Clear and consistent integration of values into performance management, goal-setting and regular team discussions.
- Evidence of learning and improvement, showing how staff feedback, concerns or ideas have led to changes that benefit customers.

Key Considerations

Employee empowerment depends on clear processes and consistent leadership behaviour, with leaders actively encouraging staff to ask questions and raise concerns.

Assessors will look for evidence that staff feel safe to speak up and that concerns are acted upon.

Reward structures should not create pressure to prioritise results over customer outcomes.

Policies such as whistleblowing must be current, accessible and supported by training.

The firm should demonstrate a focus on enabling solutions and continuous improvement, supporting learning and positive change when issues or ideas are raised.

Handy tip: Consider including a brief example that shows how an employee raised a question or concern, how it was handled, and what action followed.

Criterion 1d: *‘our firm has a comprehensive Consumer Duty strategy and uses our FCA reporting to drive better outcomes for our customers’*

Criterion Overview

This criterion assesses how well your firm has defined and embedded its Consumer Duty strategy, and how effectively this strategy supports good outcomes for the customers you serve. It considers the extent to which the strategy is aligned with your firm’s purpose and values, and how it is reflected in the policies, processes and behaviours that guide day-to-day activity.

The assessment also looks at how your firm uses information from FCA reporting and internal management data to identify areas for improvement, take appropriate action, and monitor progress over time. A strong submission will show clear connections between strategic intent, operational delivery, governance oversight and the outcomes experienced by customers, including those in vulnerable circumstances.

Suggested Evidence

The evidence you provide should help demonstrate how your Consumer Duty strategy is defined, implemented and monitored within your firm*. The list below outlines the types of documents and information that can support your submission and show how your approach operates in practice. You do not need to supply every item listed, but the evidence should be relevant, clearly presented and sufficient to illustrate how your firm delivers good outcomes for its customers.

- ☐ Document outlining the firm's Consumer Duty strategy
- ☐ Summary of key insights emerging from reporting and internal management information
- ☐ Relevant extracts from the firm's FCA Consumer Duty report with contextual explanation.
- ☐ Processes that support delivery of the strategy (e.g., product governance, communications, support pathways, staff training, complaints handling)
- ☐ Client engagement process demonstrating how insight and feedback is gathered and used
- ☐ Document outlining the firm's approach to identifying and supporting vulnerable customers, aligned with CII guidance
- ☐ Examples of actions taken in response to insights
- ☐ Evidence of quantitative measures or targets where appropriate (e.g., service metrics, complaints trends, outcome monitoring)

Success Criteria

All submissions should include:

- A clear, customer-centric strategy that works to deliver better client outcomes
- Policies and processes showing how the strategy is delivered in practice
- Examples of how FCA reporting is used to identify issues and drive action

A **good** submission will include:

- Strategic document that clearly demonstrates how the firm meets the needs of its customers
- Evidence of customer insight being used to inform decisions (e.g. feedback loops, journey analysis, complaints themes)
- Embedded approach to vulnerable customers, with training and monitoring
- Use of outcome-focused metrics, targets, or quantitatve data to demonstrate impact

An **excellent** submission will include:

- A holistic, well-articulated strategy with a clear measurement framework tracking improvements over time
- Multiple examples of insight leading to tangible, customer-centred improvements
- Evidence of measurable change supported by data (e.g. reduced errors, reduced complaints)

Key Considerations

Ensure your strategy explains what Consumer Duty means in your firm’s context and for your customers.

Focus on customer outcomes, not solely on compliance or meeting regulatory requirements.

When referencing FCA reporting, explain what was learned and implemented, what actions were taken, and how impact was assessed.

Include quantitative evidence where possible (e.g. targets, metrics, trend data), particularly when demonstrating improvements.

Explain how you gather customer insights (e.g. surveys, complaints, journey mapping) and how these insights influence decisions.

Demonstrate how improvements are monitored over time and how learnings inform ongoing changes.

Handy tip: Avoid ‘moment in time’ statements when demonstrating improvements. Instead, evidence should emphasise tracking, iteration, and continuous improvement over time.

*Evidence in support of this criterion may also be useful in support of criteria 1a, 1e, 2a, and 4b.

Criterion 1e:
'Our firm invests in insights to drive continuous innovation in our customer solutions'

Criterion Overview

This criterion assesses how your firm gathers insight from customers, staff and the wider profession, and how those insights are used to improve customer solutions over time. Assessors will look for evidence that insight-gathering is purposeful and linked to action, rather than collected in isolation.

A strong submission will demonstrate that the firm actively seeks feedback from customers and other sources, reviews this information in a structured way, and uses it to improve products, services, processes or customer experience. Innovation in this context means improving how customer needs are met over time, rather than introducing new products primarily to suit the firm's own interests.

The customer outcome is confidence that the firm is committed to continuous improvement, ensuring that both new and existing customers benefit from better experiences, services and solutions informed by insight.

Suggested Evidence

The evidence you provide should demonstrate how your firm gathers, assesses and uses insight to improve customer solutions. You do not need to supply every item listed, but evidence should be relevant, clearly presented and sufficient to demonstrate how insight leads to measurable improvement in customer experience.

- ☐ Processes for gathering customer insight, such as surveys, feedback forms, complaints analysis or review platforms.
- ☐ Evidence that customer insight is reviewed and considered as part of internal decision-making.
- ☐ Examples showing how learning from insight has led to changes or improvements.
- ☐ Use of customer metrics, such as NPS, CSAT or CES, supported by internal targets or analysis.
- ☐ Evidence of insight gained from external sources, such as industry events, Local Institutes, PFS Regions or professional bodies.
- ☐ Examples of trialling or piloting new approaches to improve customer experience.
- ☐ Evidence that lessons learned from complaints, including those escalated to the FOS or regulator, are used to review wider policies or processes.
- ☐ Public communication of customer experience measures or improvement initiatives (where appropriate).

Success Criteria

All submissions should include:

- Evidence that the firm gathers insight from customers in accessible and appropriate ways.
- Demonstration that customer feedback and complaints are reviewed, considered, and translated into changes that enhance customer solutions over time.

A **good** submission will include:

- Visible routes for customer feedback, such as clearly signposted website feedback sections or use of recognised review platforms (e.g. Trustpilot or VouchedFor).
- Structured opportunities for feedback during customer interactions, for example through meeting notes or templates capturing questions and comments.
- Active insight-gathering activities, including surveys, questionnaires, NPS, CSAT or CES measures.
- Engagement with the wider profession to inform improvement, such as attendance at industry events or Local Institute and/or PFS Regions activity.
- Evidence of learning from insight and complaints, including analysis of recurring themes and resulting improvements.

An **excellent** submission will include:

- Examples of insight-led innovation, such as piloting or testing improvements to customer experience, accessibility or support, including appropriate use of tools such as AI.
- Evidence that learning is shared and embedded, including communication of insights to staff and stakeholders, and inclusion of customer experience within CPD or development activity.
- Public visibility of customer experience measures or initiatives, such as publishing NPS scores on the firm's website.

Key Considerations

Insight should lead to action; assessors will look for evidence of change or improvement resulting from feedback.

Innovation includes improving existing services and experiences, not only introducing new solutions.

Both customer and external insights can be relevant where they contribute to better outcomes.

Public reviews and feedback may be considered alongside the firm's explanation of how issues are addressed.

Expectations are proportionate; smaller firms can demonstrate strong practice by showing how customer insight, complaints or feedback directly inform service or experience improvements.

Handy tip: If you use customer metrics such as NPS or CSAT, briefly explain what the results mean and how they influence actions taken by the firm.

Criterion 1f: *‘Our firm has a responsible Artificial Intelligence policy which is aligned with the CII Code of Ethics and the FCA’s guidance on the treatment of customers in vulnerable circumstances’*

Criterion Overview

This criterion assesses how well your firm has considered the opportunities, risks, and ethical implications of using Artificial Intelligence (AI) in its operations. Assessors will evaluate how responsibly AI is deployed and governed within your business. The assessment also focuses on whether your firm has a clear, structured approach to ensure that any use of AI supports fair customer outcomes, including for those in vulnerable circumstances. This approach must align with the principles of the CII Code of Ethics.

A strong submission will show that your firm has proactively assessed the potential impact of AI, identified where and how it may be used, and implemented safeguards to ensure its responsible and ethical application. Even where AI is used minimally or not currently in scope, firms should evidence how they communicate AI usage to clients, and how they have considered potential use cases, associated risks, governance, oversight, and assurances. Assessors will consider how well your approach protects customers, promotes transparency, and ensures that AI does not create or exacerbate harm.

Suggested Evidence

The evidence you provide should help demonstrate how your firm defines, governs, and monitors the responsible use of AI. The list below outlines the types of documents and information that can support your submission. You do not need to supply every item listed, but the evidence should be relevant, clearly presented, and sufficient to illustrate the robustness of your AI policy, risk assessment, and governance arrangements.

- [ ] A documented responsible AI policy or statement aligned with the CII Code of Ethics and FCA guidance on customers in vulnerable circumstances.
- [ ] Clear explanation of how AI is, or is not, used within the firm, including any known tools, technologies, or automation.
- [ ] Evidence that the firm has considered the potential implications, risks, and benefits of AI on customer outcomes.
- [ ] Governance documents showing management of AI use (e.g., risk registers, model governance frameworks, approval processes).
- [ ] Staff guidance or training materials that outline expectations when using AI tools.
- [ ] Evidence of customer-centric controls (e.g., bias checks, data accuracy processes, manual review steps, escalation paths).
- [ ] Examples demonstrating how responsible AI principles influence decisions, processes, or customer interactions.
- [ ] Policy extracts showing how vulnerable customers have been specifically considered within the AI framework.

Success Criteria

All submissions should include:

- A clear statement or policy showing that the firm has actively considered the use of AI and its implications for customers.
- Assurance that any use of AI is aligned with the CII Code of Ethics.
- A description of how AI is used (or not used), why, and what controls or safeguards are in place.
- Evidence of governance or oversight to ensure AI is employed responsibly, ethically, and transparently.

A **good** submission will include:

- A structured, responsible AI policy that clearly sets out how the firm approaches AI use and management.
- Evidence that the firm has assessed potential risks of AI and has measures to prevent foreseeable harm, particularly for vulnerable customers.
- Evidence that the firm has considered potential use cases, risks, and impacts, even if AI is currently used only in limited ways.

An **excellent** submission will include:

- A comprehensive, well-articulated responsible AI policy, including relevant ethical considerations and customer protections.
- Explicit identification of the AI tools or systems in use, accompanied by appropriate built-in controls for fairness, accuracy, and customer protection.
- Examples showing how the firm’s AI principles have informed decisions, improved processes, or supported fair customer outcomes.
- Evidence that AI risks (including risks associated with data protection, vulnerability to manipulation, and environmental impact) are reviewed regularly and monitored over time.

Key Considerations

The customer outcome should be assurance that the firm employs AI responsibly, ethically, and with due regard for customer needs.

Firms should demonstrate that they have thought carefully about the potential impact of AI, even where adoption is minimal.

Clear alignment with the CII Code of Ethics and FCA vulnerability guidance is essential.

Consider including examples or commitments around transparency, fairness, data privacy, and bias mitigation.

Smaller firms or those with limited AI exposure should still show awareness, due consideration, and proportionate governance.

Handy tip: Even if your firm uses little or no AI today, avoid simply stating that AI is ‘not used’.

Instead, explain how your firm has assessed potential use, ensured appropriate safeguards, and put governance in place to monitor future developments.

Criterion 2a: *'Our firm publishes a transparency policy and can demonstrate an effective communication review and improvement process, with a particular focus on vulnerable customers'*

Criterion Overview

This criterion assesses how your firm ensures customer communications are clear, accessible and transparent throughout the customer journey. Assessors will look for evidence that the firm has a defined transparency policy, supported by processes that test, review and improve communications over time.

A strong submission will demonstrate that clarity is considered at all stages of engagement, including product design, marketing, point of sale and ongoing servicing. The focus is on reducing misunderstanding, closing the gap between customer expectations and delivered outcomes, and ensuring information about fees, costs, terms and services can be readily understood.

Particular consideration should be given to customers who may need information presented differently or additional support to aid understanding. Firms should be able to show how communication standards are reviewed and adapted as customer needs change over time. The customer outcome is access to clear, understandable information that supports informed decision-making and reduces the risk of misunderstanding or harm.

Suggested Evidence

The evidence you provide should demonstrate how your firm promotes transparency and continuously improves customer communications. You do not need to supply every item listed, but evidence should be relevant, clearly presented and sufficient to illustrate how the firm ensures communications remain clear, accessible and fit for purpose.

- [ ] A published transparency policy or equivalent document setting out the firm's commitment to clear and accessible communication.
- [ ] Evidence of processes for gathering feedback on how well communications are understood, and updating materials in response.
- [ ] Examples of customer-facing communications (e.g. fees, costs, terms, guidance documents) demonstrating plain-language principles.
- [ ] Evidence of consideration for vulnerable customers within communication design and review processes.
- [ ] Reading-age assessments or style guidance (e.g. aiming for a reading age of 13 or below).
- [ ] Evidence of customer feedback being used to improve clarity and accessibility.
- [ ] Accessibility measures (e.g. font size, contrast, alternative formats).
- [ ] Use of responsible tools or techniques (including AI where appropriate) to improve clarity and consistency.

Success Criteria

All submissions should include:

- A clear commitment to transparency through a published policy or equivalent.
- Evidence that customer communications are designed to be clear, accessible and understandable.
- Processes to review and improve communications over time, including consideration of vulnerable customers.

A **good** submission will include:

- Policies and processes supporting plain-English communication, with customer-facing materials written to a reading age of around 13 or below.
- Evidence that customer feedback is used to test and improve understanding.
- Clear information provided before, during and after the point of sale.
- Transparent explanations when collecting vulnerability data, including why it is collected, how it is used, the lawful basis under UK GDPR and who it may be shared with, presented clearly and accessibly.

An **excellent** submission will include:

- A clear transparency policy supported by processes that deliver accessible, plain-language communication on fees, costs and terms.
- Proactive improvement of wording clarity, informed by customer and staff feedback and, where appropriate, responsible tools to support accessibility.
- Transparency and accessibility considered across the customer journey, from product design and marketing to onboarding and ongoing reviews.
- Additional measures to support accessibility, such as improved legibility, alternative formats and well-balanced document length.

Key Considerations

Assessors may review submitted communications against plain-language and accessibility expectations.

Firms should aim to reduce the expectation gap between what customers believe they are receiving and what is actually delivered.

Transparency benefits customers, the firm and the profession by improving trust, clarity and customer outcomes, as reflected in the CII transparency guidance.

When collecting vulnerability data, firms must explain clearly why the data is collected, how it will be used and how customers are protected.

Transparency is an ongoing process; firms should demonstrate review and improvement over time, not one-off compliance.

Handy tip:

The CII's guidance on transparency and vulnerability can provide a useful reference when reviewing customer-facing communications.

Code of Ethics Companion Guide

Customer Vulnerability Guide

Criterion 3a: ***'Our firm ensures all fees and charges are fair, transparent, and clearly understood by our customers at the earliest appropriate stage to enable them to make a conscious decision'***

Criterion Overview

This criterion assesses how effectively your firm ensures that fees and charges are fair, transparent and clearly understood by customers at the earliest appropriate stage of the relationship. Assessors will look for evidence that customers receive timely and accessible information about costs, enabling them to make a conscious and informed decision before committing to a product or service.

A strong submission will demonstrate that fee transparency is embedded into the customer journey, recognising that fees may vary depending on customer needs or services provided. Where costs differ, firms should clearly explain why this is the case and how fees are reviewed over time. The focus is on ensuring customers understand what they will pay, when they will pay it, and what options are available to them.

The customer outcome is confidence that fees and charges are fair, transparent and clearly explained early on, allowing customers to make informed choices without unexpected or hidden costs.

Suggested Evidence

The evidence you provide should demonstrate how your firm communicates fees and charges to customers. You do not need to supply every item listed, but evidence should be relevant, clearly presented and sufficient to illustrate fair, early and understandable fee disclosure.

- [ ] Public-facing information on fees and charges, or a clear process for explaining fees at the earliest appropriate stage.
- [ ] Explanation of how fees vary by service or customer, where applicable.
- [ ] Evidence of how customers are informed of changes to fees or charges over time.
- [ ] Templates or scripts used to explain fees during onboarding or advice discussions.
- [ ] Communications issued to customers following fee reviews or changes.
- [ ] Feedback or research demonstrating customer understanding of fees and perceptions of value for money.

Success Criteria

All submissions should include:

- Evidence that fees and charges are explained clearly at the earliest appropriate stage.
- Transparency on how fees are calculated or vary between customers, with assurance that all fees and charges are fully disclosed and not introduced or withheld later in the customer journey.
- Processes that ensure customers are informed of fee changes in a timely and clear manner.

A **good** submission will include:

- Published fee information or a clearly documented approach to explaining fees early in the customer relationship.
- Transparent explanation of how and when fees are reviewed.
- Clear communication to existing customers when fees or costs change, including available options.

An **excellent** submission will include:

- Proactive steps to confirm customer understanding of fees and charges, rather than assuming understanding.
- Regular discussion of fees during reviews, supported by customer feedback or research on perceived value for money.
- Evidence that fees are reviewed against the market to ensure they remain fair and appropriate.
- Use of insight, including feedback or trust research, to assess how fees affect customer confidence.

Key Considerations

Fee transparency should actively support informed and conscious customer decision-making, rather than being treated solely as a compliance exercise.

Firms should ensure that fee explanations remain clear throughout the relationship, particularly where services change or customer circumstances evolve.

Assessors may review the accessibility and clarity of fee information provided.

Hidden, unclear or late-disclosed fees are likely to prompt further assessment questions.

Handy tip: The CII Public Trust Index offers insight into public perceptions of fairness and transparency, which can inform reviews of fee communication.

Criterion 4b:
'Our firm operates robust governance processes that can be clearly evidenced'

Criterion Overview

This criterion assesses how effectively your firm governs its business, manages risk and ensures compliance with regulatory obligations, internal policies and ethical standards. Assessors will look for clear evidence that governance arrangements are structured, coherent and actively used to support a well-run and sustainable business.

A strong submission will demonstrate how governance processes link together, from strategy and policies through to oversight, monitoring and action. Assessors will consider how the firm identifies and manages emerging risks, monitors adherence to its policies, and responds when issues arise. The customer outcome is confidence in a well-governed firm that identifies risk early and responds promptly and effectively where customer outcomes are impacted.

Suggested Evidence

The evidence you provide should demonstrate how your firm's governance framework is structured and operates in practice. You do not need to supply every item listed, but evidence should be relevant, clearly presented and sufficient to illustrate robust and effective governance.

- [ ] Overview of the firm's board and committee structure (e.g. an organisational chart or governance cascade).
- [ ] Risk management policy or approach, such as a risk appetite framework or risk profile.
- [ ] Evidence of the firm's approach to compliance monitoring, which may include complaints handling, whistleblowing or audit schedules.
- [ ] A list of all Senior Management Functions within the firm.
- [ ] Relevant extracts from FCA or regulatory reporting that evidence governance, risk management or compliance oversight.
- [ ] Key firm policies linked to governance, such as EDI, complaints, whistleblowing or compliance monitoring policies.
- [ ] Records showing how governance policies are reviewed or maintained (e.g. review cycles, governance calendars).

Success Criteria

All submissions should include:

- Clear explanation of the firm's governance structure and oversight arrangements.
- Evidence that risks are identified, assessed and managed through defined processes.
- Demonstration that compliance with policies and regulatory requirements is monitored.

A **good** submission will include:

- Core governance documentation such as risk appetite frameworks, compliance monitoring approaches and complaints handling processes.
- Evidence that governance activity informs decision-making and oversight, supported where relevant by regulatory reporting.
- A coherent description of how governance, risk management and compliance monitoring operate together.

An **excellent** submission will include:

- A comprehensive governance framework, supported by additional relevant policies (e.g. conflicts of interest, whistleblowing, remuneration, modern slavery, data protection, cyber security, money laundering or AI).
- A clear explanation of how governance documents operate together, showing how policies, controls and oversight collectively support robust governance.
- Evidence that governance policies are actively used, including training, regular reviews and updates.
- Examples demonstrating how the firm learns from issues or failures, with lessons embedded through changes to policy, process or controls.

Key Considerations

Governance evidence should demonstrate how policies are used and embedded in day-to-day practice.

Assessors will look for evidence that governance arrangements are effective, with clear accountability and oversight in place.

Firms should be able to explain how governance supports early identification, escalation and resolution of issues, with a focus on customer outcomes.

Where governance issues have arisen, firms should demonstrate learning and improvement to strengthen future resilience.

Governance expectations are proportionate to firm size and complexity, but all firms should evidence oversight, structured controls and senior accountability.

Handy tip: Strong governance is shown by how policies work together in practice.

Explain how they are kept up to date, understood by staff, applied through training, and used to learn and improve when issues arise.

Criterion 5a:
'Our customers have direct access to a Chartered individual'

Criterion Overview

This criterion assesses how your firm ensures customers can access advice and support from appropriately qualified Chartered professionals. Assessors will look for evidence that access to Chartered individuals is clear, timely and meaningful, rather than symbolic.

A strong submission will demonstrate that the firm actively promotes access to Chartered professionals, recognises the value of Chartered status in supporting ethical and competent advice, and uses Chartered expertise appropriately when customer needs or complexity require it. This includes recognising equivalent Chartered titles where relevant and supporting the CII Chartered ethos.

The customer outcome is confidence that they can access an appropriately qualified and ethical professional when needed, particularly where specialist knowledge, judgement or experience is required.

Suggested Evidence

The evidence you provide should demonstrate how customers access Chartered professionals within your firm. You do not need to supply every item listed, but evidence should be relevant, clearly presented and sufficient to illustrate clear, reliable access to Chartered expertise.

- [ ] Evidence of the number of Chartered individuals within the firm, including recognised equivalent Chartered titles where applicable.
- [ ] Description of how customers can request and access a Chartered professional.
- [ ] Service standards or policies confirming response times for access to Chartered professionals.
- [ ] Public-facing information promoting or identifying the Chartered specialists within the firm.
- [ ] Examples showing how complex or specialist cases are referred to Chartered individuals.
- [ ] Information on how the firm supports and promotes progression towards Chartered status.

Success Criteria

All submissions should include:

- Clear evidence that customers can access a Chartered professional on request.
- Visible identification of Chartered individuals within the firm.
- Clear and reliable response times for access to a Chartered professional, with arrangements in place to ensure access within at least three working days of customer request.

A **good** submission will include:

- Referral to a Chartered professional within two working days of request.
- Clear signposting of Chartered individuals on the firm's website or customer-facing materials.

An **excellent** submission will include:

- Guaranteed referral to a Chartered professional within one working day of request.
- Proactive referral of customers to Chartered individuals where needs are complex or specialist input would improve outcomes.
- Active promotion and recognition of Chartered professionals through public channels such as the firm's website or communications.
- Evidence of succession planning to maintain or increase Chartered representation over time.

Key Considerations

Access to Chartered professionals should be clear, reliable and timely, giving customers confidence that qualified expertise is available when needed.

Chartered expertise should be used purposefully, particularly where customer needs are complex or specialist knowledge would improve outcomes.

Visibility of Chartered individuals supports transparency and reinforces the firm's commitment to professional standards.

Firms should consider sustainability of Chartered access over time, including succession planning and support for progression toward Chartered status.

Criterion 6a: *'Our firm has an appropriate skills development plan for our employees that includes measures, targets and accountability'*

Criterion Overview

This criterion assesses how effectively your firm identifies, develops, and maintains the skills and capabilities required to deliver high-quality customer outcomes. The assessment focuses on whether your firm has a structured approach to analysing skills needs, supporting employee development, and monitoring progress against clear, accountable measures.

A strong submission will demonstrate that the firm understands the skills required across different roles, regularly evaluates any gaps, and uses this insight to shape a development plan for staff. Assessors will look for evidence that these plans translate into improved competence, confidence, and professional standards, ultimately ensuring that customers interact with suitably trained and knowledgeable staff. This includes consideration of how performance management, professional qualifications, and continuous development are integrated into the firm's approach.

Suggested Evidence

The evidence you provide should demonstrate how your organisation identifies learning needs, develops staff skills, and monitors progress. The list below outlines the types of documents and information that can support your submission. You do not need to supply every item listed, but the evidence should be relevant, clearly presented and sufficient to illustrate how skills needs are identified, monitored and developed.

- ☐ A documented skills development plan covering behaviours, enablers, and technical expertise*. This should include all employees (or all customer-facing/regulated roles where appropriate).
- ☐ Evidence of needs analysis or skills assessment, e.g., competency frameworks, gap analyses, or role-based requirements.
- ☐ Clear measures, targets, or milestones used to track staff development.
- ☐ Examples showing how managers or leaders are accountable for monitoring and supporting development progress.
- ☐ Performance management documentation demonstrating how learning needs are identified, e.g., appraisal forms, supervision records, 1:1 reviews.
- ☐ Agreed individual development plans (IDPs) or learning plans.
- ☐ Evidence showing how skills development links to professional qualifications, CPD activity, or specialist training.
- ☐ Examples of positive outcomes from development activities (e.g., improved knowledge scores, qualification attainment, role progression).
- ☐ Templates or tools used to identify training needs, such as a skills matrix or needs analysis framework.

*Refer to the Professional Map if your firm does not already have a competence framework.

Success Criteria

All submissions should include:

- A clear and structured skills development plan for the whole firm.
- Evidence of a needs analysis or skills assessment process to identify current capability and gaps.
- Defined measures or targets for monitoring development over time.
- Clear accountability for assessing needs, supporting staff growth, and monitoring progress.

A **good** submission will include:

- A firm-wide development plan informed by a structured needs analysis.
- Evidence that the plan is actively used and progress is regularly reviewed, e.g. through performance management.
- Clear explanation of how learning needs are identified, prioritised, and addressed.

An **excellent** submission will include:

- A comprehensive needs analysis supported by clear examples of how skills gaps were identified and addressed.
- Strong evidence of positive outcomes such as qualification attainment, improved staff knowledge, or measurable gains in performance.
- Development plans linked directly to professional standards, regulatory requirements, and customer-centric capabilities.
- Specific examples demonstrating how the needs analysis is conducted, such as competency assessments, skills matrices, or structured manager-led evaluations.

Key Considerations

The customer outcome is assurance that all interactions are handled by competent, skilled, and appropriately trained staff.

Firms should be able to explain how they identify required skills, assess current capability, and address gaps.

Development should be purposeful, measurable and linked to business and customer needs; not ad-hoc or employee-driven alone.

Smaller firms can evidence competence through role-based requirements, qualifications and simple but clear needs-assessment tools.

Assessors will look for clarity on how development progress is tracked, whether through performance management, training logs, qualification pathways, or appraisal processes.

Evidence should be provided in the form of blank templates or anonymised examples, rather than documents containing individual staff data.

Handy tip: Using the CII Professional Map can help your firm to undertake a needs analysis and create an effective development plan.

Criterion 6b:
'Our firm commits to developing all staff to a level appropriate to their role'

Criterion Overview

This criterion assesses how effectively your firm supports its employees in developing the knowledge, skills and behaviours needed to perform their roles competently and deliver good customer outcomes. It links directly to the needs analysis undertaken in Criterion 6a and focuses on the actions your firm takes to address identified capability gaps.

A strong submission will demonstrate that the firm provides structured, accessible and equitable development opportunities for all staff, regardless of role or organisational size. Assessors will consider how the firm ensures consistent application of its development commitments, how progress against development plans is tracked, and how this contributes to improved competence and customer experience. Both formal and informal development approaches are acceptable, provided they are purposeful, fair, and clearly evidenced.

Suggested Evidence

The evidence you provide should demonstrate that staff development is supported across the organisation and aligned with role requirements. The list below outlines the types of documents and information that can support your submission and show how your approach operates in practice. You do not need to supply every item listed, but the evidence should be relevant, clearly presented and sufficient to illustrate how all staff are supported in developing the skills needed to fulfil their responsibilities.

- [ ] Policies or documented commitments relating to staff development, e.g., Learning & Development policy, study leave policy.
- [ ] Evidence of structured development support such as funded qualifications, on-the-job learning, or coaching.
- [ ] Examples showing how development plans are monitored and progress is tracked for all staff, not solely for select roles.
- [ ] Performance management processes that identify and review development needs.
- [ ] Career development pathways or internal progression frameworks showing how staff can grow within the organisation.
- [ ] Evidence linking development activity to the organisation's skills planning strategy, including how skills gaps are being closed.
- [ ] Use of the CII Professional Map to guide role expectations and development pathways.

Success Criteria

All submissions should include:

- Firm-wide commitment to staff development, applied equitably to all employees.
- Evidence that staff are supported to meet role requirements, with development activity aligned to competence standards and customer needs.
- A clear process to ensure development support is applied consistently, delivered fairly, and monitored over time.

A **good** submission will include:

- Policies and processes outlining the firm's commitment to staff development, including support for qualifications.
- Documented provisions such as exam or study leave, funded learning support, or similar measures demonstrating practical commitment to professional growth.
- Examples demonstrating how progress is reviewed, e.g. through appraisals or regular manager check-ins.

An **excellent** submission will include:

- Career development pathways or structured progression routes that outline opportunities for advancement and the firm's support for staff progression.
- Clear alignment with the organisation's skills planning strategy, demonstrating how skills gaps are identified, prioritised and reduced.
- Policies demonstrating longer-term commitment, including support for ongoing career development and guidance for staff returning after career breaks.

Key Considerations

This criterion builds on 6a: once skills needs are identified, firms must show how they support staff in addressing them.

Development opportunities should be applied fairly and transparently. While some role-specific or merit-based selectivity is appropriate, support should not be unfairly discriminatory or exclusive.

Assessors will look for progress monitoring, not just the existence of policies.

Simple templates or processes (e.g., L&D policy, development plan template) are acceptable so long as they demonstrate genuine support and follow-through.

Using the CII Professional Map can help ensure development is aligned to professional standards.

Handy tip:
Development approaches may differ between small and large firms. Whatever your firm size, the essential requirement is that your approach is structured, consistent, and supports all staff.

Criterion 6c:
'Our firm has market-leading levels of professional membership and CPD per role'
Guidance for **Insurance Firms**

Criterion Overview

This criterion assesses how firms ensure that their products and services are developed and delivered by suitably qualified individuals. Assessors will look for evidence that staff are supported to achieve the highest level of qualification appropriate to their role, building confidence that the organisation can demonstrate recognised expertise and professionalism.

A strong submission will set out how qualification requirements are applied across different roles within the organisation. This includes leadership, customer-facing and specialist technical functions, with staff supported to obtain qualifications that match the responsibilities of their roles. Appropriate use of equivalent qualifications from relevant professional bodies is also expected, recognising the breadth of expertise required across a modern firm.

Qualification expectations should reflect the standards associated with Chartered firms and demonstrate capability across the organisation. The customer outcome is confidence that products and services are delivered by appropriately qualified individuals, reinforcing assurance in the firm's professional standards and quality of service.

Suggested Evidence

The evidence you provide should demonstrate how qualification standards are set and met across roles. You do not need to supply every item listed, but evidence should be relevant, clearly presented and sufficient to illustrate appropriate qualification levels across the firm.

- ☐ Total number of employees, segmented by role type where relevant (e.g. underwriting, broking, customer-facing staff, specialists).
- ☐ Qualification levels held by staff, aligned to role requirements (e.g. qualification levels of staff in specialist functions).
- ☐ Evidence of qualification levels held by customer-facing staff, showing the percentage qualified at appropriate levels (e.g. Level 4, Level 5 or Level 6).
- ☐ Summary of qualification levels held by non customer-facing or specialist staff.
- ☐ Proportion of staff holding Chartered status, including CII Chartered titles and recognised equivalent professional bodies.
- ☐ Data outlining qualifications held by senior leaders, covering C-suite and Senior Management Function holders.
- ☐ Summary data illustrating progression towards higher qualification levels.
- ☐ Job specifications showing qualification expectations as essential or desirable.
- ☐ Public or internal visibility of qualifications held by senior leaders or key roles.

Please do not submit individual names or personal qualification records.

Success Criteria

All submissions should include:

- Evidence that qualification levels meet the benchmark thresholds appropriate to the firm's sector and roles.
- Clear segmentation of qualification levels across leadership, customer-facing and specialist functions.
- Summary data demonstrating overall qualification coverage across the firm.

A **good** submission will include:

- At least one Chartered individual at senior leadership level.
- Around 50% of customer-facing staff qualified to a Level relevant to their role.
- High levels of specialist function staff qualified appropriately.
- A minimum of two Chartered individuals holding titles relevant to the Chartered status awarded.

An **excellent** submission will include:

- At least two Chartered individuals at senior leadership level, with at least 25% of senior leaders holding Level 4 or above.
- Around 65% of customer-facing staff qualified to a Level relevant to their role.
- Very high levels of specialist function staff qualified appropriately.
- At least 25% of total staff holding Chartered status, with a minimum of two Chartered individuals holding titles relevant to the Chartered status awarded.
- Visibility of qualifications within the firm, such as inclusion in staff profiles or email signatures.
- Qualification requirements embedded into recruitment and progression practices.

Key Considerations

This criterion is benchmark-led and focuses on quantitative evidence.

This criterion recognises that expertise may be demonstrated through a range of recognised professional qualifications, not solely those offered by the CII. Firms may therefore evidence appropriate qualifications from equivalent professional bodies where relevant.

Expectations differ between financial planning and insurance firms and should be applied accordingly.

Assessors will consider this criterion alongside 6a, 6b and 6d as part of a coherent development journey.

Qualification levels should reflect role complexity and responsibility.

Handy tip: During the pilot phase, firms are encouraged to explain or challenge assumptions and benchmarks relating to "market-leading" qualification levels.

Criterion 6c:
'Our firm has market-leading levels of appropriate qualification by role'
Guidance for **Financial Planning Firms**

Criterion Overview

This criterion assesses how firms ensure that their services are developed and delivered by suitably qualified individuals. Assessors will look for evidence that staff are supported to achieve the highest level of qualification appropriate to their role, building confidence that the organisation can demonstrate recognised expertise and professionalism.

A strong submission will set out how qualification requirements are applied across different roles within the organisation. This includes leadership, customer-facing and specialist technical functions, with staff supported to obtain qualifications that match the responsibilities of their roles. Appropriate use of equivalent qualifications from relevant professional bodies is also expected, recognising the breadth of expertise required across a modern firm.

Qualification expectations should reflect the standards associated with Chartered firms and demonstrate capability across the organisation. The customer outcome is confidence that services are delivered by appropriately qualified individuals, reinforcing assurance in the firm's professional standards and quality of service.

Suggested Evidence

The evidence you provide should demonstrate how qualification standards are set and met across roles. You do not need to supply every item listed, but evidence should be relevant, clearly presented and sufficient to illustrate appropriate qualification levels across the firm.

- ☐ Total number of employees, segmented by role type where relevant (e.g. advisers, customer-facing staff, specialists).
- ☐ Qualification levels held by staff, aligned to role requirements (e.g. qualification levels of staff in specialist functions).
- ☐ Total number of financial advisers employed by the firm.
- ☐ Evidence of qualification levels held by financial advisers, showing the percentage qualified at appropriate levels (e.g. Level 4, Level 5 or Level 6).
- ☐ Proportion of financial advisers holding Chartered status, including CII Chartered titles and recognised equivalent professional bodies.
- ☐ Data outlining qualifications held by senior leaders, covering C-suite and Senior Management Function holders.
- ☐ Summary data illustrating progression towards higher qualification levels.
- ☐ Job specifications showing qualification expectations as essential or desirable.
- ☐ Public or internal visibility of qualifications held by senior leaders or key roles.

Please do not submit individual names or personal qualification records.

Success Criteria

All submissions should include:

- Evidence that qualification levels meet the benchmark thresholds appropriate to the firm's sector and roles.
- Clear segmentation of qualification levels across leadership, customer-facing and specialist functions.
- Summary data demonstrating overall qualification coverage across the firm.

A **good** submission will include:

- At least one Chartered individual at senior leadership level.
- Financial Advisers are qualified in line with FCA regulatory requirements.
- At least 50% of Financial Advisers holding Chartered status or progressing towards this.
- High levels of specialist function staff holding qualifications appropriate to their role.

An **excellent** submission will include:

- At least two Chartered individuals at a senior leadership level, with at least 25% of senior leaders holding Level 4 or above.
- Financial Advisers are qualified in line with FCA regulatory requirements, with 70% at or progressing towards Level 6.
- At least 65% of advisers holding Chartered status or progressing towards this.
- Very high levels of specialist function staff qualified appropriately.
- Visibility of qualifications within the firm, such as inclusion in staff profiles or email signatures.
- Qualification requirements embedded into recruitment and progression practices.

Key Considerations

This criterion is benchmark-led and focuses on quantitative evidence.

This criterion recognises that expertise may be demonstrated through a range of recognised professional qualifications, not solely those offered by the CII. Firms may therefore evidence appropriate qualifications from equivalent professional bodies where relevant.

Expectations differ between financial planning and insurance firms and should be applied accordingly.

Assessors will consider this criterion alongside 6a, 6b and 6d as part of a coherent development journey.

Qualification levels should reflect role complexity and responsibility.

Handy tip: During the pilot phase, firms are encouraged to explain or challenge assumptions and benchmarks relating to "market-leading" qualification levels.

Under current expectations, at least 50% of the firm's financial advisers will hold the Chartered Financial Planner title.

Criterion 6d:
'Our firm has market-leading levels of professional membership and CPD per role'

Criterion Overview

This criterion assesses how your firm supports high professional standards through widespread professional membership and appropriate CPD requirements across roles. Assessors will look for evidence that professional membership and CPD are not limited to a small group, but are used deliberately to raise standards, capability and ethical behaviour across the firm.

A strong submission will demonstrate that the firm values professional membership as more than a numerical requirement. It will show how membership of professional bodies links staff to recognised standards, codes of conduct and ongoing learning, and how CPD expectations are applied proportionately across roles.

The customer outcome is assurance that staff knowledge and skills are current, relevant and maintained to professional standards, supported by external accountability to recognised professional bodies.

Suggested Evidence

The evidence you provide should demonstrate how professional membership and CPD are embedded across the firm. You do not need to supply every item listed, but evidence should be relevant, clearly presented and sufficient to illustrate how professional membership and CPD requirements are applied and supported across different roles.

- ☐ A list of professional bodies supported by the firm and the number or percentage of staff who are members of each.
- ☐ Evidence of CPD expectations per role, including minimum hours and structured requirements.
- ☐ Job specifications identifying professional membership as desirable or essential for specific roles.
- ☐ Evidence that CPD expectations extend beyond members to all staff, where appropriate.
- ☐ Use and promotion of professional body resources, such as the CII Professional Map, Code of Ethics or Vulnerability Guidance.
- ☐ Access to tools for recording and managing CPD.

Success Criteria

All submissions should include:

- Evidence of professional membership across the firm, supported and encouraged by the organisation.
- Clear CPD requirements aligned to roles, meeting or exceeding minimum professional standards.
- Minimum CPD expectations of 35 hours per year, with at least 21 structured hours, supported by the firm.
- Demonstration that CPD expectations are understood and monitored.

A good submission will include:

- Professional membership levels that meet sector expectations, for example around 30% of staff in insurance firms or 60% in financial planning firms being members of a professional body.
- Job specifications identifying professional membership as desirable.

An excellent submission will include:

- Market-leading membership levels, such as around 80% of staff across financial planning firms or 50% across insurance firms holding membership of a relevant professional body.
- Clear role-based membership expectations, with professional membership identified as essential for customer-facing or strategic roles.
- Demonstrable investment in professional standards, such as funded access to assessments or learning resources.
- Active promotion of professional body resources to all staff, regardless of membership status, including use of the CII Professional Map, Vulnerability Guidance, Code of Ethics and related learning materials.

Key Considerations

Professional membership should help raise standards across the firm, rather than being limited to a small group of staff.

CPD expectations should be applied by role, reflecting responsibilities and contribution to customer outcomes.

Assessors will consider how professional membership and CPD are supported, monitored and embedded, not only headline percentages.

Expectations may vary between insurance and financial planning firms.

This criterion is being assessed as part of a pilot phase. Firms are encouraged to explain their approach to "market-leading" practice and provide context where benchmark figures are challenged or exceeded.

» Handy tip: Under current Chartered rules, corporate Chartered firms are expected to have at least 90% of customer-facing staff holding CII membership.

Firms may wish to explain how their arrangements meet or exceed this expectation.

Criterion 7a: *'Our firm has active engagement with the Local Institutes or PFS Regions and supports employee involvement in and attendance at CPD events'*

Criterion Overview

This criterion assesses how your firm engages with Local Institutes or PFS Regions to support employees in accessing relevant CPD opportunities. It considers how the firm contributes to its professional community, helps build local networks, and encourages staff to learn from peers and sector experts. Effective participation strengthens professional standards, enhances staff knowledge and capability, and improves customer outcomes through more informed and collaborative practice.

A strong submission will demonstrate active engagement (appropriate to the size and structure of the firm) and show how staff are encouraged to participate in CPD as part of their professional development.

Suggested Evidence

The evidence you provide should demonstrate how your firm engages with Local Institutes or PFS Regions and supports participation in CPD. You do not need to supply every item listed, but evidence should be relevant, clearly presented, and sufficient to illustrate active engagement and support for employee development.

- [ ] Examples of engagement with Local Institutes or PFS Regions (e.g., attendance at meetings, events or forums).
- [ ] Evidence that staff are encouraged and supported to attend relevant CPD events as part of their working time.
- [ ] Policies or internal communications that demonstrate the firm's commitment to ongoing professional development.
- [ ] Contributions to CPD development, such as feedback on CPD themes or suggestions for future topics.
- [ ] Encouraging staff participation in CII or PFS research activities (e.g., CII Voices).
- [ ] Evidence of internal ambassadors or coordinators who share information about local or digital CPD opportunities.

Success Criteria

All submissions should include:

- Clear evidence of commitment to engaging with Local Institutes or PFS Regions.
- Evidence that staff are supported to attend appropriate CPD events during working hours.
- Consistent processes that encourage participation and demonstrate how CPD engagement supports staff development.

A **good** submission will include:

- Policies or processes that outline how the firm raises awareness of CPD opportunities and supports staff attendance.
- Practical examples such as study leave, time allocated for CPD, volunteering, or communications promoting local or digital events.
- Evidence that staff contribute to the wider professional community, for example by providing feedback on CPD needs or engaging with research surveys.

An **excellent** submission will include:

- Use of the Professional Map to identify priority skills gaps within individual development plans, with relevant local or digital CPD to address those gaps.
- A nominated staff member who role-models CPD attendance and maintains regular engagement with Local Institute or PFS Region representatives. Officer roles held by staff within the Local Institute.
- Active contribution to CPD and professional good practice, such as hosting events, providing speakers, contributing articles, or participating in CII research or qualification development.

Key Considerations

Engagement should be appropriate to the size and capacity of the firm, with both large and small firms demonstrating meaningful support.

Attendance at CPD events should be accessible and encouraged as part of working time, not reliant on personal time.

Involvement with Local Institutes or PFS Regions helps build networks, strengthen skills, and improve customer outcomes.

Firms can demonstrate impact through participation, contributions to CPD development, or sharing insights and good practice.

The CII will also work directly with Local Institutes and PFS Regions to seek feedback on examples of best practice by Chartered firms, and to identify where more support is needed. This information may be considered in addition to the submission by the firm as part of an application for/renewal of Chartered status.

Handy tip: Evidence of your firm promoting CII good practice resources, CPD events, or other campaigns - either publicly through social media or internally on staff newsletters, could be accepted as evidence towards meeting this criterion.

Criterion 7b: *'Our firm invests in the future of the profession, recruiting and supporting new entrants through pathways to professionalism'*

Criterion Overview

This criterion assesses how your firm supports the development of new entrants to the insurance and financial planning profession, helping them build the knowledge, skills and behaviours needed for a long-term career. It considers how your firm provides access to early-career opportunities, such as apprenticeships, internships, school engagement, work shadowing and structured development programmes, and how these activities reflect a commitment to promoting professionalism from the outset.

A strong submission will show that the firm invests appropriately in new talent based on its size, resources and operating model. Assessors will consider both formal and informal pathways, ranging from comprehensive early-career programmes in larger firms, to community-based engagement or apprenticeship support in smaller firms. The customer outcome is assurance that ethical, professional standards are embedded early in staff careers, contributing to a culture where good practice is established from the start.

Suggested Evidence

The evidence you provide should demonstrate how your firm supports new entrants and contributes to pathways into the profession. The list below outlines the types of documents and information that can support your submission and show how your approach operates in practice. You do not need to supply every item listed, but the evidence should be relevant, clearly presented and sufficient to illustrate how the firm recruits, supports and develops early-career talent.

- [ ] Policies, statements or documents demonstrating commitment to supporting new entrants.
- [ ] Evidence of early-career pathways (e.g., apprenticeships, internships, work shadowing, structured induction).
- [ ] Examples showing how new entrants are supported in their development (e.g., mentoring, study support, skills training).
- [ ] Engagement with schools, colleges, universities or Local Institutes or PFS Regions to promote the profession.
- [ ] Structured development programmes (e.g., early-career frameworks or "emerging talent" schemes).
- [ ] Evidence of progression, such as roles achieved by former new entrants or ongoing career-long pathways.
- [ ] Use of CII career pathways to guide professional development.

Success Criteria

All submissions should include:

- Clear policies or development plans that support new entrants and provide appropriate early-career development opportunities.
- Evidence of structured support for new entrants that is proportionate to the firm's size (e.g., apprenticeships, shadowing, induction).
- Demonstration that development activity is applied consistently and supports the embedding of professional and ethical standards.

A **good** submission will include:

- Promotion of the profession in a manner appropriate to the firm's size, with larger firms contributing at a sector-wide level and smaller firms demonstrating local engagement.
- Practical examples such as mentoring, apprenticeships, study leave, funded qualifications, or collaboration with local schools or colleges.
- Evidence that new entrants' development and progress are reviewed through structured management oversight.

An **excellent** submission will include:

- Established documents and processes demonstrating structured pathways for new entrants, with clear monitoring of progress and achievements over time.
- Career-long development pathways or progression routes that outline long-term opportunities for advancement.
- Robust evidence of sustained support, such as funded qualifications, mentoring schemes, or progression incentives.
- Creation of or participation in government-approved apprenticeships that support young learners through their career development.

Key Considerations

Investment will look different for large and small firms; the expectation is that each demonstrates meaningful, proportionate commitment.

Firms should demonstrate ongoing support for new entrants, monitoring their progress and achievements over time and ensuring development continues beyond initial entry into the profession.

Assessors will look for evidence of support, follow-through and progression opportunities - not just recruitment.

Engagement with local education providers, Local Institutes, or PFS Regions can strengthen submissions and demonstrate community or sector-wide impact.

Firms should be able to show how their approach contributes to broader professional standards and the profession's long-term sustainability.

Criterion 7c: ***'Our firm conducts or contributes to good practice, research or CPD to the benefit of the wider profession'***

Criterion Overview

This criterion assesses how your firm helps advance the wider profession through meaningful involvement in good practice, research or CPD. Assessors will expect to see evidence that the firm engages constructively in sector-wide initiatives, shares insight or expertise, or helps develop professional learning that benefits practitioners beyond its own organisation.

Assessors will consider the extent to which the firm's activities help strengthen the profession's knowledge base, support continuous improvement and promote higher standards of practice. This could include responding to consultations or insight requests, participating in CPD development, sharing thought leadership, or generating research that informs wider understanding.

The customer outcome is improved professional standards across the sector, ensuring customers benefit from a Chartered community that continually develops its knowledge, examines emerging issues and collaborates to enhance service quality.

Suggested Evidence

The evidence you provide should demonstrate how your firm contributes to the development or dissemination of good practice, research or CPD. You do not need to supply every item listed, but the evidence should be relevant, clearly presented and sufficient to illustrate how the firm engages with and supports the wider profession.

- [ ] Examples of contribution to research, good practice or CPD (e.g., responding to surveys, consultations, insight requests).
- [ ] Evidence of participation in CII or PFS initiatives, Chartered-related engagement or sector-wide activities.
- [ ] Demonstration of sharing expertise or supporting professional learning.
- [ ] Examples of staff involvement in Local Institute or PFS Region activities.
- [ ] Evidence of hosting, contributing to, or supporting CPD sessions or good-practice discussions.
- [ ] Internal initiatives that help advance industry knowledge (e.g., articles, thought pieces, participation in round tables).

Success Criteria

All submissions should include:

- Evidence of contribution to good practice, research or CPD in a way that supports the wider profession.
- Examples of engagement proportionate to the firm's size, resources and expertise.
- Demonstration of professional and constructive participation in sector or CII-related activity.

A good submission will include:

- Regular contribution to CII or PFS surveys, insight requests or consultations.
- Participation in professional events, including Chartered-related activities or CII initiatives.
- Examples of sharing expertise with the profession, such as quotes for publications, involvement in sector campaigns or support during Chartered Week.

An excellent submission will include:

- Proactive contribution to CPD development, such as hosting sessions, delivering webinars or providing subject-matter expertise for CII or PFS programmes.
- Active involvement in research or knowledge-building, including producing or sharing original research or thought leadership that benefits the profession.
- Clear evidence of leading or instigating initiatives that support the sector, such as specialist research projects, advanced CPD content or participation in debates and professional forums.

Key Considerations

Firms should ensure their contribution has clear benefit to the wider profession, such as sharing knowledge or participating in research that helps improve sector standards.

Assessors recognise that contributions will be proportionate to the firm's size, e.g. smaller firms may contribute through surveys or local engagement, while larger firms may host or lead research activities.

Evidence should show meaningful engagement over time; assessors will look for consistency of contribution where possible.

When engaging in research or good practice discussions, firms should provide constructive, professional input, avoiding commentary that is dismissive or unfairly critical.

Contributions may reflect a range of activities, including participation in CPD development, publishing insight, contributing to consultations, supporting Local Institute or PFS initiatives, or sharing expertise at events.

Criterion 8a: ***'Our firm ensures that our employees' understanding of key issues impacting our customers, and their ability to respond appropriately to people's different needs, are kept up to date through annual CPD'***

Criterion Overview

This criterion assesses how your firm ensures employees remain able to understand and respond to the changing financial and personal needs of customers. Assessors will look for evidence that annual CPD supports staff in recognising individual circumstances and applying this understanding in practice.

A strong submission will demonstrate that annual CPD equips employees to recognise and respond to a broad range of customer needs. This includes supporting staff to understand financial objectives, personal circumstances, vulnerability, cognitive or learning needs, and wider external factors. Assessors will consider whether learning activity is relevant, current and informed by both customer experience and emerging issues.

The customer outcome is confidence that their individual needs are properly understood and considered, supported by up-to-date staff knowledge and development.

Suggested Evidence

The evidence you provide should demonstrate how CPD supports staff in understanding and responding to customer needs. You do not need to supply every item listed, but evidence should be relevant, clearly presented and sufficient to illustrate how how learning activity is refreshed to reflect evolving customer needs and risks.

- [ ] CPD plans or frameworks showing coverage of customer needs, behaviours and circumstances.
- [ ] Evidence that staff undertake regular CPD focused on both financial and personal needs.
- [ ] Examples showing how learning content is updated to reflect emerging issues.
- [ ] Training materials covering areas such as vulnerability, neurodiversity, life events or ethical preferences.
- [ ] Development linked to external factors affecting customers, such as economic or geopolitical change.
- [ ] Use of professional learning resources or topical content to support CPD activity.
- [ ] Evidence that staff feedback informs learning priorities.

Success Criteria

All submissions should include:

- Annual CPD that supports understanding of customer needs, including financial and personal circumstances.
- Evidence that CPD helps staff act appropriately when responding to different customer needs.
- Evidence that learning remains current and relevant, extending beyond mandatory topics to reflect real-world customer considerations.

A good submission will include:

- Core learning to help staff assess and respond to customer needs, including financial goals, preferences and personal circumstances.
- CPD addressing a range of customer considerations, such as risk appetite, financial goals, ethical preferences, life events, and cognitive or learning needs.
- Evidence that staff knowledge is refreshed through regular CPD, reflecting emerging issues such as neurodiversity or potential geopolitical impacts affecting customers.

An excellent submission will include:

- Policies and processes that define how customer needs are identified and addressed, supported by relevant CPD.
- Regular review of learning content so new and emerging issues are captured and addressed promptly.
- Use of customer feedback or data to improve training and processes over time.
- A two-way flow of insight, where the firm anticipates emerging issues and staff are empowered to raise new learning needs based on customer experience.

Key Considerations

Effective CPD for this criterion includes learning beyond mandated topics, supporting understanding of customer needs and emerging issues.

CPD should be kept current in response to emerging customer needs and external developments, such as changes in understanding of neurodiverse needs or wider economic and geopolitical factors that may affect customers.

Assessors will look for evidence that CPD is updated regularly and informed by real customer experience.

Firms should encourage a two-way flow of insight, using both forward-looking analysis and staff experience of customer interactions to shape CPD priorities.

Handy tip: Consider how staff learning is refreshed in response to emerging issues, such as economic change or evolving customer needs, and how this learning is shared across the firm.

Criterion 9a: *'Our firm publishes a sustainability policy'*

Criterion Overview

This criterion assesses how effectively your firm demonstrates a clear and transparent approach to sustainability, covering both environmental responsibilities and wider societal impact. It considers how the firm incorporates sustainability into its operations, policies and decision-making processes, including environmental responsibility, social impact and alignment with long-term client interests.

A strong submission will show that sustainability is recognised as part of the firm's operational, strategic and client-facing approach, and that the firm has taken proportionate steps to reduce harm and contribute positively to society.

The customer outcome is confidence that the firm acts responsibly, understands wider environmental and societal risks, and incorporates sustainability into its decisions in a way that supports long-term resilience.

Suggested Evidence

The evidence you provide should demonstrate how your firm embeds sustainability principles into its operations. You do not need to supply every item listed, but the evidence should be relevant, clearly presented and sufficient to illustrate how sustainability is recognised, implemented and monitored.

- ☐ A published sustainability policy that reflects environmental and wider societal considerations.
- ☐ Evidence of actions taken or planned to reduce environmental impact (e.g., energy-saving measures, waste reduction, responsible procurement).
- ☐ Examples showing how sustainability factors are considered in decision-making, client work or operational planning.
- ☐ Activities contributing to sustainability (e.g., cycle-to-work schemes, community clean-ups, electric vehicle charge points, energy-saving initiatives).
- ☐ Evidence of staff ESG knowledge, training or awareness.
- ☐ Evidence that sustainability is embedded into other policies or processes, for example within the firm's purpose statement or AI policy.

Success Criteria

All submissions should include:

- A published sustainability policy that addresses environmental and wider societal impact.
- Evidence of actions taken or planned to reduce environmental impact in a manner proportionate to firm size.
- Recognition of sustainability as relevant to client needs and long-term risks.

A **good** submission will include:

- A sustainability policy supported by measurable or monitored actions aimed at reducing environmental impact.
- Evidence of addressing policy shortfalls with planned improvements.
- Examples of unbiased and responsible operational practices, with expectations adjusted for firm size and geography.
- Staff with appropriate baseline ESG knowledge.

An **excellent** submission will include:

- A sustainability policy embedded into governance, product development and operational planning, with evidence that sustainability informs new projects and strategic decisions.
- Clear identification of opportunities and actions taken to reduce environmental impact, supported by reporting or a sustainability statement.
- Evidence of reductions in carbon footprint or demonstrable positive impact over time.
- Public-facing communication about responsible business practices.
- Use of sustainability champions, advanced ESG training and robust due-diligence frameworks.

Key Considerations

Sustainability should be recognised as both an environmental and wider societal responsibility.

Assessors will look for evidence of action and progress over time, not just the existence of a policy.

Firms should demonstrate that staff hold appropriate ESG knowledge and can recognise key sustainability risks and options for clients.

For financial advice, firms should identify and record client sustainability preferences where appropriate, These should inform suitability assessments, research, client education and ongoing reviews, including consideration of systemic risks and client resilience.

Handy tip: Sustainability should be seen as broader than environmental impact alone, extending to responsible business practices and wider societal contribution.

Criterion 10a: *'Our firm publishes an inclusive recruitment policy and evidence of EDI programmes, including pay gap analysis and board representation'*

Criterion Overview

This criterion assesses how your firm demonstrates commitment to inclusive, fair and equitable recruitment and employment practices. It considers how well the firm supports diversity across its workforce, ensures unbiased recruitment and promotion processes, and monitors representation and outcomes across protected and wider diversity characteristics.

A strong submission will show how the firm promotes inclusion, complies with relevant legislation, and reflects society in a way that enhances customer experience. The customer outcome is fair, unbiased treatment from a workforce that is inclusive, representative and aligned with equitable recruitment practices.

Suggested Evidence

The evidence you provide should demonstrate how your firm embeds inclusive recruitment and EDI practices. You do not need to supply every item listed, but the evidence should be relevant, clearly presented and sufficient to illustrate how the firm promotes inclusion, monitors diversity and takes action where needed.

- An inclusive recruitment policy that reflects fair and open hiring practices.
- Evidence of EDI programmes or activities (e.g., staff networks, training, inclusive language guidance).
- Examples of monitoring or measuring EDI outcomes (e.g., diversity data, pay gap analysis where applicable, board or senior leadership representation).
- Evidence of actions taken where gaps or disparities are identified.
- Processes demonstrating unbiased recruitment and promotion (e.g., structured objective interviews, anonymised screening).
- Evidence of EDI intent appropriate to firm size and geography (e.g., remote work options to widen recruitment pools, support for returning parents and carers).

Success Criteria

All submissions should include:

- A published inclusive recruitment policy demonstrating fair and unbiased hiring practices.
- Evidence of EDI programmes or activities that support inclusion and reflect legal and ethical requirements.
- Monitoring of relevant diversity metrics, with proportionate actions taken where issues or gaps are identified.

A **good** submission will include:

- EDI policies and processes supported by evidence of monitoring and review (e.g., pay gap analysis, diversity data, recruitment audits).
- Examples of actions taken to address identified shortfalls, such as improving outreach or removing bias from hiring practices.
- Evidence of fair recruitment practices and support for returning parents and carers.

An **excellent** submission will include:

- A comprehensive set of policies and processes underpinning EDI, including inclusive recruitment, strategy, board-level representation data and pay gap analysis where possible.
- Evidence of proactive EDI leadership, such as an internal EDI champion or structured EDI initiatives that influence recruitment and development.
- Evidence of widening recruitment pools through remote working, relocation support or outreach activities that support diversity.
- Consideration of diversity beyond the protected characteristics, including socioeconomic diversity, neurodiversity and intersectionality.

Key Considerations

Firms should demonstrate awareness of their specific diversity challenges and show how they have sought to address them.

Submissions will be viewed proportionately: expectations differ between small and large firms, but all must demonstrate meaningful commitment to inclusion. Firms of over 250 employees are required to publish gender pay gap analysis.

Assessors will consider whether recruitment practices are fair, unbiased and reflective of EDI principles.

Evidence of action taken to improve representation is as important as the data itself.

Handy tip: Engagement with the CII's EDI resources can help strengthen submissions.

CII EDI Journey

Inclusive Recruitment Guide

Inclusive Language Guide

Pay Gap Guide