

## Finding a pragmatic, sustainable and cost effective solution to TCF is still a challenge for many firms



Many firms have recently been focusing their attention almost exclusively on TCF MI to meet the March deadline. This has left limited time to focus on the broader elements of embedding TCF and addressing TCF culture.

Even firms that have already turned their attention to embedding TCF are finding it difficult due to one or more of the following:

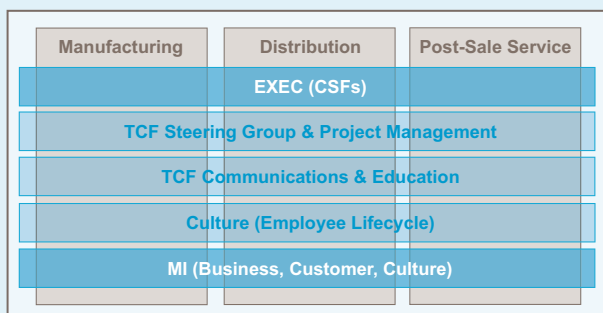
- Lack of prescriptive guidance and consistent feedback from the FSA
- Lack of senior management buy-in and business engagement
- Focus only on the regulatory imperative without a clear view of what TCF means and its benefits to a firm
- Still being driven by Risk / Compliance
- 'Fairness', 'embedded' and 'culture' have not been clearly defined nor consistently understood across the stakeholder groups
- Confusion about 'culture change' rather than focusing on ensuring behaviours embed TCF into business as usual
- Ownership of 'culture' is unclear
- Lack of an outcome based approach to measuring and embedding TCF
- The wider business is not fully engaged nor clear what is required
- The key levers of behavioural change are not being fully understood and utilised to embed TCF
- The adoption of the TCF Programme may be inconsistent across different business units
- Confusion over the role and activities of central functions versus business units
- Requirements for differing populations have not been understood
- TCF is being hijacked to address broader transformational issues

These issues invariably lead to frustration, wasted effort through tactical, short-term or point solutions and a failure to address the underlying risks and issues. This makes it difficult to create a business as usual approach to TCF that has the right buy-in throughout the business to be fully sustainable.

**So how do firms address these issues and ensure they are working to deliver embedded TCF for the end of 2008?**

Huntswood find that answer is to take a structured best practice approach like that developed by Huntswood over the last two years from working on TCF with major firms across banking and insurance.

We have a tried and tested unique methodology for TCF that incorporates MI decision making, product, employee and programme improvement lifecycles.



Our approach has been successfully applied both at a centrally managed highly structured TCF programme 'light-touch' business unit-led TCF activity. This gives a robust picture of activity to date, develop and demonstrate an effective and committed approach, accelerate embedding and form a strong and convincing story for the FSA.

All our work to date has started with an initial 'Readiness Review' that assesses the effectiveness of TCF activity with respect to the six consumer outcomes, MI and six culture drivers it identifies strengths, weaknesses and the design of the right solution going forwards.

**Huntswood Readiness Review**

We have a team of dedicated TCF consultants who have assessed, designed and delivered TCF programmes across Banking, Life & Pensions and General Insurance.

Engaging Huntswood will help you:

- Understand and define where you are with respect to the industry and want to be in terms of embedded TCF MI and the cultural elements required by the FSA
- Understand the value of any work to date and how it can be used going forwards
- Get the right stakeholders from the business, HR and Marketing on board and aligned to mobilise the best team in terms of level and skills around a pragmatic solution to accelerate activity
- Embrace and adapt the right approach for your business to rapidly develop and agree an action plan to cover the design, implementation and embedding of TCF
- Integrate all the 'people' elements with the 'process' elements of TCF to build a lasting business as usual solution

**We offer two approaches:**

1. A rapid readiness assessment involves
  - A two week review of MI, product lifecycle and culture
  - A report outlining strengths, issues, risks and improvement recommendations
2. Readiness assessment and design
  - A four week review of MI, product lifecycle and culture
  - A report outlining strengths, issues, risks plus programme design, plan, recommended best practice approach to mobilisation and estimated costs for activity going forwards to deliver embedded TCF for the end of 2008 and beyond