

Dentons Pension Management Limited

The regulatory regime with regard to Self Invested Personal Pensions (SIPPs)

Dentons Pension Management Ltd (DPM) is authorised and regulated by the Financial Services Authority (FSA) with its registration number being 461094.

The principal Permission granted to DPM by the FSA is for the establishment, operating and winding up of personal pension schemes and, whilst authorised to *control* client money, DPM is not authorised to hold such funds on its own account.

With the FSA's *Treating Customers Fairly* (TCF) requirements, advisory firms who are considering using DPM's products might wish to have a better understanding of how DPM discharges its own responsibilities within the TCF arena. These are some of the frequently asked questions seeking details on how DPM is taking steps to achieve the following:

- **The quality of systems and controls, administration procedures, T & C regimes and management information:**

As a part of the FSA Thematic SIPP Review, DPM provided the FSA with a considerable amount of information on its operating procedures and management processes. The FSA then carried out a lengthy telephone interview – aimed at verifying and corroborating the detail previously supplied. The FSA subsequently confirmed that

'...Dentons were in a position to demonstrate that consumers can be confident that they are dealing with a firm where the operation of its SIPP scheme is being run in accordance with FSA regulatory requirements....and also demonstrated the deliverance of fair outcomes for customers such that consumers can be confident that they are dealing with a firm where the fair treatment of customers is central to its culture.'

- **The financial strength of the organisation:**

The FSA's Capital Adequacy rules require DPM to submit quarterly financial summaries. In this regard, DPM's funding situation is that it has consistently held reserves that are very substantially higher than that required by the FSA.

- **How much actual experience the principals have in administering SIPPs:**

The three advising Directors average over 20 years service with DPM and have been actively involved in the creation and administration of SIPPs from their inception in 1989.

Actuarial & Pension Consultants

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The following companies, all of which are Registered in England, and with their Registered Offices being as above, comprise the Dentons Group:
Dentons Pension Management Ltd (Reg No 2352951); Denton & Co Trustees Ltd (Reg No 1939029);
NTS Trustees Ltd (Reg No 1407848) and Dentons Investment Services Ltd (Reg No 3955927)

Dentons Pension Management Ltd and Dentons Investment Services Ltd are both Authorised and Regulated by the Financial Services Authority

- **How SIPP accounts are administered and the segregation of duties:**

DPM's SIPP administration is principally based upon the underlying experience of its Pension Consultants with each having the support of experienced administrators. The consultants have an average of 19 years service with DPM and, collectively, hold qualifications from a number of Professional bodies – including the Institute of Actuaries, the Pensions Management Institute and the Chartered Insurance Institute. Each Consultant is responsible for a portfolio of accounts and is supported by a dedicated team of administrators.

- **How SIPP providers interact with advisory firms that introduce clients:**

Consultants are encouraged to develop professional relationships with introducing firms and to gain an in-depth understanding of their requirements and are always available to respond to, and seek solutions, to issues, problems and queries that introducers might have.

- **How SIPP operators manage potential conflicts of interest where they or associated firms also give advice:**

DPM's clients come predominantly from Independent Financial Advisers (IFAs) with it being DPM's philosophy that advice should come from the IFAs – thus avoiding potential conflicts of interest.

- **The extent to which firms are embedding TCF and how they are applying TCF to SIPP administration:**

The DPM Board of Directors have long regarded TCF as a priority and every effort is made to cascade this down through line management and Consultants, on to administrators and secretaries, to ensure that everyone understands the fundamental requirements of TCF and its application to the operation of its SIPPs.

- **The quality of client communications, including illustrations, disclosure and transparency of charges:**

DPM has an experienced review team who continually monitor client documentation, illustrations, disclosure and procedures to ensure their accuracy and technical validity. All product literature is independently reviewed to ensure clarity and accuracy of the content – and without the use of industry 'jargon'.

- **How SIPP operators combat fraud and money laundering:**

With DPM, the underlying key to the prevention of fraud is that the SIPP holder must be a joint signatory to any payment made from their account. DPM is unable to remove funds upon its own authority. With regard to anti-money laundering processes, DPM follow industry guidelines as set out by the Joint Money Laundering Steering Group and also work with introducing intermediaries to ensure that the identity of clients are correctly confirmed.

- **The Firm's structure with regard to Trust arrangements.**

DPM operates its SIPPs under a 'Master Trust' arrangement with each individual SIPP holder being appointed as a Trustee of a sub-Trust with this ring-fencing the individual's SIPP assets from other plans and from DPM itself.

In the event that any additional information is required, please do not hesitate to contact Dentons on 01483 521521.

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