**Distributor Information Document** 

**Irwell Insurance Company Limited** 

# Product Oversight and Governance Summary Multi Occupancy Properties

December 2023



## **Overview of the product oversight and governance process**

Product oversight and governance refers to the systems and controls that the manufacturing firms have in place to design, approve, market and manage products through their lifecycle.

Good product governance and oversight result in products that meet the needs, objectives, interests and characteristics of the target markets, being sold through appropriate distribution channels, delivering appropriate customer outcomes and providing products that provide fair value to those customers.

Irwell fully supports this aim.

#### **Information for distributors**

Irwell will provide:

- Policy Summaries / IPID
- Policy Wordings
- Underwriting Manual (Binding Agents only)

Full details of the coverage and limits applicable to this product can be found in the policy wording.

#### Retail brokers and wholesale brokers (non-advised)

It has been agreed that this product will be distributed by the Binding Agent on a non-advised basis to retail and wholesale agents that are FCA authorised, established in the United Kingdom, and have been through the annual due diligence process that the Binding Agent has advised as being in place. Sub-delegating is not allowed unless specifically authorised by Irwell.

A suitable assessment of the customer's demands and needs must be made before each sale by the agent in direct contact with the insured.

#### **Product Information**

Irwell's Standalone Liability policy provides a range of covers including:

- Employers Liability
- Public Liability
- Products Liability

Irwell's Standalone Liability policy is subject to a number of conditions and restrictions:

- The policy limits are:
  - £10,000,000 (Employers Liability)
  - £1m, £2m. £5m or £10m (Public and Products Liability)
- Access
- Change of Risk or Interest
- Compliance
- Conduct and Control of Claims
- Contracts (Rights of Third Parties) Act 1999
- Cross Liability
- Data Protection
- Inspection and Audit

- Law and Jurisdiction
- Other Insurance
- Premium Adjustment
- Reasonable Precautions
- Sanctions
- Survey Requirements

Irwell's Standalone Liability policy is also subject to the following exclusions, excesses and limitations:

- Asbestos
- Biological or Chemical Materials
- Confiscation and Requisition
- Communicable Disease
- Cyber Risks
- Industries Gradual Seepage, Pollution and Contamination
- Insolvency
- Material Change of Insured Risks
- North America Domiciled and Jurisdiction
- Offshore Installations
- Other Insurance
- Punitive and Exemplary Damages
- Radioactive Contamination
- Terrorism
- War

Please speak with your Binding Agent for further information on the product range.

# **Identified Target Market**

The identified target market for this product is detailed below. The customer's agent is responsible for ensuring that the product meets the demands and needs of each customer, and it is possible that there are customers outside of this target market whose demands and needs may be met by this product.

Equally, some customers inside the target market may have risk factors that mean other products available are more suitable.

- Freeholders and Leaseholders of Multi Occupancy Property

*Customers for whom the product is not suitable because it would not provide fair value:* 

- Freeholders and Leaseholders of Multi Occupancy Property without employees and without exposure to third-party liabilities
- Freeholders and Leaseholders of Multi Occupancy Property that are based outside of the UK.
- Freeholders and Leaseholders who are not required or expected to purchase the insurance within their agreement.

# **Third Parties**

All claims will be handled by the following Third-Party Administrator:

DWF Claims Management and Adjusting Redcliff Quay 120 Redcliff Street Bristol BS1 6HU

Email: <u>irwell@dwfclaims.com</u> Tel: 0344 892 3937

## **Exit Charges**

Irwell does not charge any fee if a customer cancels their policy, a pro-rata refund of the unexpired premium is provided subject to no known losses or claims.

## **Complaints and Compensation**

## **Complaints:**

#### If your complaint is about the way a policy was sold to you

If **Your** complaint is about the way a policy was sold to **You**, please contact the insurance intermediary who sold the policy to **You**.

#### If your complaint is about your claim

**We** are committed to providing a high level of service, but if **You** believe that **We** have not delivered the service **You** expected from **Us**, please let **Us** know so that **We** can put things right. If **You** wish to make a complaint, please contact:

The Complaints Officer Irwell Insurance Company Limited 2 Cheetham Hill Road Manchester M4 4FB

Email:info@Irwell.co.ukTelephone:0344 892 0164

**We** will contact **You** within 3 days of receiving **Your** complaint to inform **You** of what action **We** are taking. **We** will try to resolve **Your** complaint within 4 weeks. If it will take **Us** longer, **We** will explain why and let **You** know when **You** can expect **Our** final response.

## **Referring your complaint to the Financial Ombudsman Service**

If **You** are not happy with **Our** response to **Your** complaint, or **You** have not received a response within 8 weeks of the date **We** received **Your** complaint, **You** may be eligible to refer **Your** case to the Financial Ombudsman Service.

The Financial Ombudsman Service can review complaints from 'eligible complainants,' but **Your** complaint must be submitted to them within 6 months of receiving **Our** final response.

Further information can be found at:

www.financial-ombudsman.org.uk

The Financial Ombudsman Service exists to help resolve complaints when **We** have not been able to resolve matters to **Your** satisfaction.

The service they provide is free and impartial.

You can contact the Financial Ombudsman Service using the following details:

Financial Ombudsman Service Exchange Tower Harbour Exchange Square London E14 9SR

Tel: 020 7964 1000 Fax: 0207 964 1001 Email: <u>complaint.info@financial-ombudsman.org.uk</u> Web: www.financial-ombudsman.org.uk

This complaints procedure does not affect **Your** legal rights.

#### **Financial Services Compensation Scheme**

The **Insurer** is a member of the Financial Services Compensation Scheme (FSCS). **You** may be entitled to compensation from the scheme if **We** are unable to meet our liabilities under this insurance. This depends on the type of business and the circumstances of the claim. Such claims are protected for 90% without any upper limit. For compulsory classes of insurance, the claim will be met in full. Further information about the compensation scheme arrangements is available from FSCS. Information can be obtained on request, or by visiting the FSCS website at <u>www.fscs.org.uk</u>

## **Product Approval Process**

The purpose of this process is to ensure the product puts the needs of the customers first, to ensure they get a product that they can confidently expect to meet their needs at the point of

sale and throughout the life of their policy and provides fair value to the customer throughout this time.

Irwell undertakes a product risk assessment for each newly developed product and where there are significant changes to an existing product. In addition, its product oversight and governance process are followed to ensure that products remain suitable for the target market.

Numerous factors are considered during this process that consider such aspects as the suitability of, and risks associated with, the distribution chain, product features and benefits, the claims process and the level and detail of complaints.

## Situations that may conflict to the detriment of the customer.

Irwell has not identified any specific circumstances in relation to this product that conflict with the best interests of the customer. Below are outlined some examples of circumstances that could be considered a conflict:

- Sales incentives that incentivise sales rather than ensuring the most appropriate products are provided.
- Claims being handled by underwriters, or oversight of the claims department being provided by underwriting managers.
- Volume based commissions for producing brokers.
- Acting on the brokers instructions in respect of the price to charge for a risk.
- Net rating the product with no clearly documented pricing strategy.
- Leaseholders not being involved in policy selection.
- Non adherence to the latest FCA Multi Occupancy Leasehold Insurance Rules

# **Fair Value Assessment**

Based on all of the information available, Irwell has concluded that this product does provide fair value to customers.

Version	Date	Description
1	18/12/2023	Distributor Information with
		Fair Value Assessment



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www.irwell.co.uk