

The Financial Life Coach

Rule Book

Guiding Principles, Client Engagement, and Ethical Standards for
Trusted Financial Planning



The Financial Life Coach - Rule Book for Financial Planning Services

Introduction Welcome to The Financial Life Coach, part of the Academy of Life Planning. We transform cashflow into life's opportunities by specialising in innovative lifetime cashflow planning. As your financial planners, we provide impartial and comprehensive guidance throughout your financial journey. We are not financial intermediaries; instead, we serve as your trusted generic financial planning advisers, ensuring transparency, fairness, and ethical engagement in all our practices.

Our Services:

- **Self-Directed & Collaborative Planning:**
 - **HapNav Tool:** Offers a low-cost solution for clients who prefer to undertake their financial planning independently.
 - **Voyant Modeller:** For those seeking advanced, planner-assisted strategies, our premium service includes the use of the Voyant cash flow modeller to navigate complex financial scenarios effectively.
- **Comprehensive Financial Solutions:**
 - Covers all aspects from investment planning to retirement and estate planning. For regulated investments, we provide coaching for DIY approaches and facilitate introductions to suitable wealth managers.

Our Unique Approach:

- **Inclusive Strategy:**
 - We cater to a diverse range of clients, including those with smaller investment assets. Our services are designed to support self-direction and manage non-regulated assets such as property and international investments.
- **Innovative Framework:**
 - Our Ikigai proposition extends beyond traditional cash flow management. We focus on achieving 'Kokoro'—harmonising mind, body, heart, and spirit—and on creating new financial income streams. This holistic approach involves identifying productive assets, leveraging entrepreneurial opportunities, and fostering sustainable livelihoods.
- **Asset Strategising & Liability Forecasting:**
 - Expertise in forecasting and strategising helps clients transform their financial goals into achievable plans, providing a clear roadmap for financial growth and security.

The Financial Services and Markets Act 2000 (FSMA 2000), particularly through the Regulated Activities Order 2001, specifies which activities are considered regulated financial services. Notably, educational financial services that do not include direct financial intermediation or management of investments typically fall outside the scope of regulated activities under FSMA 2000.

Key Points Relevant to "The Financial Life Coach" Services:

1. Non-Regulated Activities:

- Educational services that provide general advice on financial planning without making specific investment recommendations or handling client funds are not classified as regulated activities. This includes tools or services that facilitate clients to make their own financial decisions, such as the HapNav tool and Voyant cash flow modeller mentioned.

2. Guidance vs. Advice:

- The distinction between regulated advice (which involves recommending specific financial products) and unregulated guidance (which includes general financial education and planning) is significant. As our services are designed to support clients in making informed decisions independently or guiding them to suitable wealth managers without recommending specific financial products, they remain outside the regulated scope.

3. Financial Coaching and Planning:

- Financial coaching, when not linked to specific financial product recommendations or the handling of investments, generally does not constitute a regulated activity. Our service model, which emphasises educational support and strategic planning over product-specific advice, aligns with this categorisation.

4. Implications for Compliance:

- While our services are not subject to the regulatory requirements of the Financial Conduct Authority (FCA), they are still governed by general consumer protection laws such as the Consumer Protection from Unfair Trading Regulations 2008. This ensures that all business practices must be fair, transparent, and not misleading.

The Rules:

1. Compliance and Regulation

- **Regulatory Framework:**
 - Our educational financial services are guided by the principle of enabling clients to make informed financial decisions independently. These services are classified under general consumer law rather than the Financial Services and Markets Act 2000, as they do not involve regulated financial activities.
 - Governed by the Consumer Protection from Unfair Trading Regulations 2008 and related amendments, our practices are designed to uphold transparency and protect consumer interests without the need for FCA regulation.
 - As non-intermediaries in financial products, our role is to provide educational tools and planning frameworks, such as the HapNav and Voyant systems, which support self-directed financial management.
- **Consumer Protection from Unfair Trading Regulations 2008 (CPRs):**
- **Prohibited Practices:**
 - **Banned Practices:** There are 31 specific practices banned outright due to their potential to harm consumers, such as false limited-time offers or creating an impression that the consumer cannot leave the premises without making a purchase.
 - **Misleading Actions:** These include providing information that deceives or is likely to deceive the average consumer, affecting their economic behaviour or causing them to make a decision they would not have made otherwise.
 - **Misleading Omissions:** Failure to provide essential information needed for the consumer to make an informed decision, leading to a distorted decision-making process.
 - **Aggressive Practices:** Using harassment, coercion, or undue influence, thereby significantly limiting the consumer's ability to make an informed decision.

The Consumer Protection from Unfair Trading Regulations 2008 identifies 31 specific practices that are considered particularly harmful to consumers and are therefore banned outright. These practices are known as "blacklisted" activities and cover a range of deceptive and coercive tactics that traders might use. Below is an expanded list of these practices in bullet format, which are included in our rule book to ensure comprehensive compliance and consumer awareness:

The 31 Banned Commercial Practices:

1. **Claiming to be a Signatory to a Code of Conduct:** Falsely stating that the trader, including their commercial practices, is approved by a public or private body.
2. **Displaying a Trust Mark Without Authorisation:** Using a quality mark or equivalent without having obtained the necessary authorisation.

3. **Falsely Stating that a Product Will Only Be Available for a Very Limited Time:** Creating an unjustified sense of urgency to provoke an immediate purchase.
4. **Claiming that Products are Able to Facilitate Winning in Games of Chance:** Misleading consumers about the benefits of the product.
5. **Creating the False Impression that the Consumer has Already Won:** When in fact taking any action in relation to claiming the prize is subject to the consumer paying money or incurring a cost.
6. **Falsely Claiming to Offer a Competition or Prize Promotion:** Without awarding the prizes described or a reasonable equivalent.
7. **False Claims of Product Availability:** Misleading consumers regarding the nature of the risk if they do not buy immediately.
8. **Making a Misleading Factual Claim About the Nature and Extent of the Risk:** To the personal security of the consumer or their family if they do not purchase the product.
9. **Promoting a Product Similar to a Particular Make, Model or Brand:** With the deliberate intention not to supply them and to sell another product instead (bait and switch).
10. **Making an Invitation to Purchase Products at a Specified Price:** And then refusing to show the advertised item to consumers, refusing to take orders for it or deliver it within a reasonable time.
11. **Claiming in a Promotion that the Trader is About to Cease Trading or Move Premises:** When they are not.
12. **Falsely Stating that a Product or Service will Only Be Available for a Very Limited Time:** To elicit an immediate decision and deprive consumers of sufficient opportunity or time to make an informed choice.
13. **Undertaking to Provide After-Sales Service to Consumers:** In a language which is not an official language of the Member State where the trader is located, without clearly disclosing this before the consumer is committed to the transaction.
14. **Describing a Product as 'Gratis', 'Free', 'Without Charge' or Similar:** If the consumer is going to have to pay anything other than the unavoidable cost of responding and collecting or paying for delivery of the item.
15. **Including in Marketing Material an Invoice or Similar Document:** Seeking payment which gives the consumer the impression they have already ordered the marketed product when they have not.
16. **Falsely Claiming that a Product Can Cure Illnesses, Dysfunction, or Malformations:** The representation of a product as a "miracle cure" or "guaranteed" solution.
17. **Falsely Implying that the Trader is Not Acting for Purposes Relating to His Trade, Business, Craft or Profession:** Or falsely representing oneself as a consumer.
18. **Creating False Impressions of the Nature of the Sales Process:** Implying that the online sales process is for merely obtaining an item that is part of the market norm.

19. **Falsely Stating or Creating the Impression that the Trader is About to Cease Trading:** Or move premises when he is not, to persuade the consumer to make a quick purchase.
20. **Passing on Misleading Information on Market Conditions:** To induce the consumer to purchase the product at conditions less favourable than normal market conditions.
21. **Claiming in a Sales Promotion that the Consumer has Won a Prize:** Or has the chance of winning this if it's not true, or if the prize does not exist.
22. **Using Editorial Content in the Media:** To promote a product where the trader has paid for the promotion without making that clear in the content or by images or sounds clearly identifiable by the consumer.
23. **Making a "Bait Advertising" Promotion:** Not intending to supply the advertised products or services, or not in reasonable quantities and for a reasonable time.
24. **Making Persistent and Unwanted Solicitations:** By telephone, fax, e-mail, or other remote media except in circumstances and to the extent justified to enforce a contractual obligation.
25. **Demanding Immediate or Deferred Payment for or the Return or Safekeeping of Products Supplied by the Trader:** But not solicited by the consumer except where the product is a substitute supplied in compliance with the Consumer Contracts (Information, Cancellation and Additional Charges) Regulations 2013.
26. **Explicitly Informing a Consumer that if He Does Not Buy the Product or Service:** The trader's job or livelihood will be in jeopardy.
27. **Creating the Impression that the Consumer Cannot Leave the Premises:** Until a contract is formed.
28. **Conducting Personal Visits to the Consumer's Home:** Ignoring the consumer's request to leave or not to return, except in circumstances and to the extent justified to enforce a contractual obligation.
29. **Initiating Misleading and Aggressive Practices:** That use harassment, coercion, including physical force, or undue influence.
30. **Creating the False Impression that the Trader is a Consumer:** Not a professional trader.
31. **Creating a False Sense of Urgency:** Misleading the consumer to believe they will suffer an immediate penalty if they do not buy at once.

These practices are strictly prohibited as they create a transactional environment based on deception and pressure, contrary to the principles of fair trading. Including these details in our rule book ensures that all stakeholders are aware of the boundaries within which our company operates and is intended to uphold consumer trust and regulatory compliance.

- **General Prohibition Against Unfair Commercial Practices:**
 - A practice is deemed unfair if:
 - It contravenes the requirements of professional diligence;
 - It distorts or is likely to distort the economic behaviour of the average consumer it reaches or to whom it is addressed.
- **Transactional Decisions Defined:**
 - Encompasses any decision taken by the consumer concerning whether, how, and on what terms to purchase, make payment, retain, or dispose of a product.

2. Business Obligations and Consumer Rights

- **Transparency, Fair Practice, and Disclosure:**
 - **Transparency About Services:**
 - We commit to full transparency concerning the nature and terms of the services provided. All clients will receive comprehensive details about the tools and resources offered, including their scope and intended use.
 - It will be clearly communicated that our services do not constitute regulated financial advice. Instead, they are designed as educational tools that empower clients to improve their financial understanding and decision-making capabilities.
 - **Nature of Financial Guidance:**
 - Our financial planning advice is generic and strategically focused, aimed at enhancing clients' overall financial literacy. This approach supports clients in making informed decisions that best suit their individual financial situations.
 - We ensure that all guidance provided is non-biased. Our strategies do not promote any financial products or investments specifically, and are crafted to respect and maintain the client's autonomy.
 - **Disclosure of Potential Conflicts of Interest:**
 - We will disclose any relationships or affiliations that could potentially affect the impartiality of the advice provided. This commitment to honesty ensures that clients can trust the integrity of the guidance they receive.
 - Should any conflicts of interest arise, they will be declared openly before any advice sessions commence, ensuring that clients are fully aware and can make decisions with all relevant information at hand.

- **Clarity on Non-Regulated Nature of Services:**
 - Detailed explanations will be provided to clarify that our services do not fall under activities regulated by the Financial Services and Markets Act 2000. This distinction is crucial for setting the appropriate expectations for the client.
 - Clients will be informed that while we provide comprehensive financial planning tools and generic financial planning advice, the responsibility for any financial decisions made based on this guidance rests with them.
- **Consumer Rights and Protections:**
 - We adhere strictly to the Consumer Protection from Unfair Trading Regulations 2008, ensuring all practices are fair and do not mislead or exploit consumers.
 - Clients have the right to clear, understandable information about all services provided. They are entitled to question and receive timely and straightforward explanations about any aspect of our services.
- **Ongoing Support and Adjustments:**
 - Continuous support will be offered to all clients, including the adjustment of financial plans as clients' circumstances evolve. This dynamic approach ensures that our services remain relevant and tailored to individual needs.
 - Feedback mechanisms will be in place to allow clients to express their needs and experiences, which will be used to further refine and enhance our services.
- **Commitment to Best Practices:**
 - Our operations are committed to upholding the highest standards of financial planning practice. We engage in continual professional development to ensure our team remains at the forefront of industry developments and best practices.

3. Client Engagement Process

- **Initial Consultation:**
 - **Pre-engagement Transparency:**
 - Prior to any engagement, clients will receive detailed information about the nature of the consultation process, what to expect, the scope of services provided, and an overview of potential outcomes. This ensures clients are well-prepared and can maximise the benefits of the consultation.

- A clear, upfront disclosure of all associated costs will be provided. This includes any fees for the initial consultation as well as potential costs tied to further services or tools that might be recommended.
- We will explain the methodological approach behind our financial planning services, including the use of any specific tools such as HapNav or Voyant, ensuring clients understand the framework and rationale behind the advice and planning strategies offered.
- **Consultation Objectives:**
 - The initial consultation aims to thoroughly assess the client's current financial situation, understand their financial goals, and identify any immediate concerns that need to be addressed.
 - During this session, we will outline the customised approach that will be taken should the client choose to proceed with our services, tailoring our tools and strategies to fit their specific needs.
- **Agreement and Rights:**
 - **Clarity on Agreement Terms:**
 - Upon deciding to engage further with our services, clients will be presented with a detailed agreement outlining the terms of our service provision. This agreement will include the scope of services, what they entail, and the obligations of both parties.
 - Clients will be informed of their rights under the agreement, including but not limited to, cancellation rights. Clients can cancel their service agreement within a specified period, which will be clearly articulated in the terms of engagement.
 - **Guarantees and Warranties:**
 - Any guarantees or warranties associated with the services will be explicitly stated. These guarantees will cover the accuracy of information provided during the financial planning and the expected quality of service as per the agreement.
 - **Rights to Modify or Discontinue Services:**
 - Clients retain the right to modify their engagement with "The Financial Life Coach" at any point. This includes changing the scope of services received or discontinuing services altogether.
 - We will clarify the process for making such changes, ensuring clients understand how to communicate their needs and the timeline for implementing these changes.
 - **Privacy and Data Protection:**
 - Client confidentiality and privacy are paramount. We adhere to strict data protection protocols to secure personal and financial information.

- Information on how client data will be used, stored, and protected will be provided, aligning with GDPR and other relevant data protection legislation.

4. Consumer Outcomes

- **Rights and Recourses:**
 - **Consumer Rights Under CPRs:**
 - Clients are entitled to specific protections under the Consumer Protection from Unfair Trading Regulations 2008 (CPRs), which safeguard against misleading or aggressive commercial practices. These regulations ensure that all commercial acts engaged by "The Financial Life Coach" are conducted with fairness, honesty, and transparency.
 - Should a client believe that they have been subjected to misleading representations or aggressive sales tactics, they have the right to seek redress. This includes the right to undo a contract, receive a discount, or in some cases, claim damages where applicable.
 - **Redress for Misleading or Aggressive Practices:**
 - In the event that a client feels misled or pressured into decisions during their engagement with our services, we provide a clear and structured process for seeking redress:
 - **Immediate Resolution:** Clients are encouraged to contact our internal complaint handling service directly. Contact details, including a dedicated email address and phone number, will be prominently provided.
 - **Formal Complaints Process:** If the issue is not resolved to the client's satisfaction informally, they may submit a formal complaint in writing. We will acknowledge receipt of the complaint within 3 working days and aim to resolve all formal complaints within 28 days.
 - **Escalation:** Should the client be dissatisfied with the resolution or if the complaint is not resolved within the specified time frame, the client has the right to escalate their complaint to external bodies.
 - **Contact Details for Complaint Handling:**
 - **Internal Complaint Handling Contact Information:**
 - Email: steve@finlife.coach
 - Phone: +44 7850 102070
 - Address: 9 Franklin Way, Spilsby, Lincolnshire PE23 5GG.

- **External Bodies:**
 - Clients also have the option to contact external bodies for further recourse. This includes the local Trading Standards office and, where appropriate, the Financial Ombudsman Service:
 - **Trading Standards Contact Information:**
 - Website: [Local Trading Standards Website](#)
 - **Financial Ombudsman Service:**
 - Website: www.financial-ombudsman.org.uk
 - Phone: 0300 123 9 123

5. Ethical Standards

- **Professional Diligence:**
 - **Commitment to High Standards:**
 - At "The Financial Life Coach," we are committed to upholding the highest standards of skill and care reasonably expected of a professional in the financial planning field. This commitment is integral to our service delivery and underpins all our client interactions.
 - We ensure that all financial advisors and staff members are not only qualified but remain abreast of ongoing developments in the financial sector. Continuous professional development is mandated to ensure that our team can provide the most current and effective financial advice.
 - **Adherence to Best Practices:**
 - Our practices are designed to comply with all applicable laws and regulations, including the Consumer Protection from Unfair Trading Regulations 2008 and other relevant guidelines that govern financial advice and consumer protection.
 - We adhere strictly to ethical business practices, avoiding any actions that would mislead or unfairly influence our clients. This includes transparent communication about the potential risks and benefits of any financial strategies discussed.
 - **Quality of Service:**
 - The advice provided is always prepared with diligence and care, ensuring it is tailored to meet the specific financial situations and goals of our clients. We base our strategies on thorough analysis and robust financial planning principles.
 - Regular audits and reviews of our service offerings are conducted to ensure they meet the expected standards of quality and efficacy. Client

feedback is actively sought and used constructively to improve service delivery.

- **Client-Centric Approach:**
 - Decisions and advice are formulated with the client's best interests in mind, prioritising their financial needs and objectives. This approach ensures that our services are delivered with professional impartiality and integrity.
 - We maintain complete transparency with clients regarding the costs associated with our services and any changes to their financial plans. Clear documentation is provided to all clients to support their understanding and acceptance of our financial strategies.
- **Responsibility and Accountability:**
 - "The Financial Life Coach" takes full responsibility for the advice and services provided. We hold ourselves accountable for ensuring that all client interactions are conducted ethically and in compliance with statutory obligations.
 - In the event of any disputes or dissatisfaction from clients, we have a robust grievance redressal mechanism. This ensures that any issues are resolved promptly and fairly, further reflecting our commitment to high ethical standards.

6. Definitions and Terminology

To ensure clarity and prevent any misunderstandings, the following terms used within this rule book are defined as follows:

- **Financial Planner:** Refers to any professional providing strategic advice on managing clients' finances, including but not limited to savings, investments, and planning for retirement. Financial planners do not transact financial products nor execute financial operations on behalf of their clients.
- **Client:** Any individual or entity that engages with "The Financial Life Coach" to receive financial planning services.
- **Regulated Financial Services:** Financial activities that are subject to regulatory oversight by bodies such as the Financial Conduct Authority (FCA). These include investment advice, insurance mediation, and handling client monies, among others.
- **Non-Regulated Services:** Services that do not fall under the regulatory purview of bodies like the FCA. These typically include educational materials, generic financial planning advice, and tools for self-directed financial management.
- **Consumer Protection from Unfair Trading Regulations 2008 (CPRs):** Legislation that protects consumers from unfair or misleading trading practices and ensures fair treatment in the market.

- **Agreement:** A formal contract between "The Financial Life Coach" and the client outlining the terms of engagement, services to be provided, fees, and other pertinent details.
- **Redress:** Compensation or corrective action taken to rectify any wrongdoing or dissatisfaction experienced by the client, as governed by the CPRs.
- **Cancellation Rights:** The rights of a client to terminate the engagement with "The Financial Life Coach" within a specified period, as detailed in the service agreement.
- **Guarantees and Warranties:** Commitments made by "The Financial Life Coach" to uphold certain service levels and quality, providing clients with specific legal rights if these commitments are not met.
- **Misleading Practices:** Any activity or representation that can deceive the consumer, affecting their economic decision-making or harming them financially or otherwise.
- **Aggressive Practices:** Strategies that significantly impair the consumer's freedom of choice through the use of harassment, coercion, or undue influence.
- **Data Protection Legislation:** Laws that govern the protection of personal data, ensuring that it is processed safely, legally, and transparently. Primary legislation includes the UK General Data Protection Regulation (UK GDPR).
- **Professional Diligence:** The standard of skill and care that a professional in the field of financial advice is reasonably expected to exercise towards their clients.
- **Consumer:** An individual who receives or uses goods or services for personal use and not for manufacturing or resale.

7. Amendment and Review

- **Review Schedule:**
 - **Annual Review:**
 - The rule book will be subject to an annual review to ensure that all contents remain current and reflective of the latest legal standards, regulatory requirements, and best practice guidelines. This review will be conducted by a dedicated team within "The Financial Life Coach" that includes compliance officers and legal advisors.
 - The review will assess changes in legislation that impact financial advisory practices, including updates in consumer protection laws, data protection regulations, and any amendments to financial services regulations.
 - **Continuous Improvement:**
 - In addition to the annual review, the rule book may be updated periodically in response to significant regulatory changes or after the identification of best practices that could enhance client service and

compliance. This ensures that our practices not only meet but exceed industry standards.

- **Client Notification:**
 - **Notification Mechanisms:**
 - A structured mechanism is in place to notify existing clients of significant changes to the rule book. Notifications will be communicated through multiple channels to ensure that all clients are aware of these updates.
 - **Channels of Communication:**
 - **Email:** Clients will receive an email notification detailing the changes, reasons for those changes, and the implications for their service engagement. Each email will include a direct link to the updated rule book.
 - **Client Portal:** Updates will also be posted on the client portal where the latest version of the rule book will always be accessible.
 - **Meetings:** Significant changes that require detailed explanations will be addressed in scheduled review meetings with clients. This allows for direct dialogue and personalized explanations.
 - **Record of Acknowledgement:**
 - Clients will be asked to acknowledge receipt of the notification regarding rule book updates. This may be done electronically through the client portal or manually during client meetings. This process ensures that all clients have been informed and understand the new terms.
 - **Feedback Opportunity:**
 - Following the update notification, clients will be provided a period to offer feedback or ask questions regarding the changes. This feedback will be reviewed by our client service team and addressed promptly to ensure clarity and resolve any concerns.

Appendix and Contact Information

This section of the rule book provides comprehensive contact details for "The Financial Life Coach" and useful links to further resources that can help clients understand their consumer rights and relevant trading regulations.

- **Contact Details:**
 - **Main Office:**
 - **Address:** 9 Franklin Way, Spilsby, Lincolnshire PE23 5GG
 - **Phone:** 07850 102070
 - **Email:** steve@finlife.coach
 - **Operating Hours:** Monday to Friday, 9:00 AM to 5:00 PM (Local Time)
 - **Customer Service:**
 - **Contact Number:** 07850 102070
 - **Email:** steve@finlife.coach
 - **Contact Form:** Clients can also reach us via the contact form available on our website at www.finlife.coach/contact.
 - **Availability:** Our customer service team is available from 8:00 AM to 6:00 PM (Local Time) to assist with any inquiries or support needs.
 - **Complaint Handling:**
 - **Direct Line for Complaints:** 07850 102070
 - **Email for Complaints:** steve@finlife.coach
 - **Procedure:** Clients wishing to make a complaint can contact us directly via the above phone number or email, or alternatively, fill out a complaint on our website at www.finlife.coach/contact.
 - **Response Time:** All complaints will be acknowledged within 2 working days, and we aim to resolve any issues within 14 working days.
- **Further Resources:**
 - **Consumer Rights and Protections:**
 - **Link to Consumer Protection from Unfair Trading Regulations 2008:** www.legislation.gov.uk/ukxi/2008/1277/contents/made
 - **Financial Ombudsman Service:** For additional support and to learn more about your rights under financial services, visit www.financial-ombudsman.org.uk.
 - **Trading Standards:** Information on consumer rights and protections can be found at www.tradingstandards.uk.
 - **Educational Resources:**

- **Money Advice Service:** Free and impartial money advice, set up by the government, that can be found at www.moneyadviceservice.org.uk.
- **Citizens Advice:** For comprehensive advice and to understand the rights provided by consumer law, visit www.citizensadvice.org.uk.

This rule book layout ensures compliance with UK consumer laws while providing clear, actionable information to both your staff and clients. It aims to promote transparency, fairness, and understanding, critical components in the financial planning sector.