

### Overview

In the 2022 JUST Annual Care Report which you can find [here](#), it was stated that a staggering 91% of individuals who have helped find care didn't seek the help of a regulated financial adviser when exploring options.

As such, we recognise that in order for those individuals to access the support that they need, it would be beneficial for Long-Term Care Accredited Partners to create links with other businesses or individuals to promote themselves as specialists in this area. Working with care homes and/or domiciliary care providers is one such opportunity.

Given the vulnerable circumstances of the clients and their families involved in the care process, any such promotion should understandably be treated with a high degree of sensitivity, and we must also be mindful of the higher standards of regulation set by the FCA.

### Document History

Date	Version	Summary of key change/s
November 2022	1.0	New guidance and clarification of practice

### Working with care providers (including care homes)

Before considering whether to work with a particular care provider, it would be prudent to consider the quality of the home as well as reviewing their regulatory rating. Whilst this can change over time, by understanding a history of the level of care provided it will give a sense of ongoing standards.

The regulatory bodies in each jurisdiction are as follows:

England	Care Quality Commission <a href="http://www.cqc.org.uk">www.cqc.org.uk</a>
Wales	Care and Social Services Inspectorate <a href="http://www.careinspectorate.wales">www.careinspectorate.wales</a>
Scotland	Care Inspectorate <a href="http://www.careinspectorate.com">www.careinspectorate.com</a>
Northern Ireland	The Regulation and Quality Improvement Authority <a href="http://www.rqia.org.uk">www.rqia.org.uk</a>

Both the PROMS (Care Home), Introducer Agreement and Financial Promotions processes outlined in the 'Important Considerations' section should be followed before any arrangements are made.

## Seminars

A wide range of guidance and support material for hosting a successful Later Life/Long Term Care campaign is available in the Long-Term Care section of the Marketing Campaigns Portal [here](#).

Pre-approved, scripted seminar slides are also available in Marketing Store [here](#), and content can be selected to suit the relevant audience.

## Care homes

Some caution should be exercised when running seminars in care homes. The primary reason for the caution is one of risk, or perceived increased risk due to the potential for affiliation with the care provider to be considered as an endorsement of the care standard provided. In the event that the care provider were to fall foul of regulatory standards, this may cause reputational damage to your business and/or St. James's Place.

Should you choose to run a seminar at a care home you should check the regulatory rating of the care home is one of a good standard.

## Retirement villages/sheltered accommodation

Retirement Villages should not immediately indicate that a client has a care need, but some retirement villages do have dual-function and offer a care element.

Similarly, sheltered housing does not necessarily signify a care need, but to be eligible for this type of accommodation, an individual will generally be considered elderly or vulnerable, or both.

Therefore, the same considerations should be given to a seminar in a care home, when assessing the suitability of hosting a seminar in this setting.

## External venues

Hosting and promoting long-term care seminars at venues such as hotels or local interest groups (i.e. Women's Institute, Probus etc.) is permitted.

## One-to-one surgeries

The perceived risk of hosting 'Friends & Family Surgeries' for clients who are already resident within the home is greatly reduced compared with seminars; as residents/clients are more likely to have already chosen to receive care within that particular setting. Therefore, it is less likely for your association to be considered a commendation of standard, resulting in a more relaxed position with this approach.

## Open days/events

Where an open day or event is being organised and run by a care provider, and a Partner has been invited to attend in conjunction with other professionals, this is considered an acceptable event to participate in.

## Working with SOLLA and other third parties

Partners that hold the SOLLA 'Later Life Adviser Accreditation' are permitted to attend and support seminars in care homes or other venues under the SOLLA banner.

Partners are permitted to support events and seminars that are being hosted and arranged by a third party affiliation (e.g. solicitor firm).

In these circumstances, any promotional material created to support the event still requires approval from Financial Promotions with disclaimer wording included as appropriate. See below for further information.

## Working with Symponia

Symponia was formed in 2005 with a vision to ensure every family facing the dilemma of funding private care fees would have access to a suitably qualified adviser, not just local to them, but also well versed in the subject of care fees planning.

Symponia's 'Circle of Trust' programme attempts to bring together care providers, private client solicitors and financial advisers into an easy to navigate one stop shop for consumers and professionals. Symponia work with care homes throughout the UK to build relationships and break down some of the barriers ensuring their professional members are given a receptive welcome.

We are aware that Partners occasionally receive correspondence from Symponia inviting them to become members. Partners should be aware that we do not have a corporate relationship with Symponia and this is unlikely to change in the future. However, the choice to take out membership is at your discretion. If you do decide it's worth pursuing, then an Introducer Agreement will be required.

A number of Partners have elected to become members and has been mixed - some have been happy with the opportunities provided, while others have discontinued the relationship due to lack of commercial benefit.

Before committing to this opportunity, as with all memberships of this nature, it is important to understand both the benefits and limitations available from the membership before handing over any fees. It is also important to understand any membership refund policy should Symponia be unable to meet the commitments of the membership.

Partners that choose to affiliate with Symponia are permitted to attend and support seminars in care homes or other venues under the Symponia banner, however, any promotional material created to support a Symponia event should still be approved from Financial Promotions with disclaimer wording included as appropriate. See below for further information.

## Important considerations (PROMS, Introducer Agreements & Financial Promotions)

### PROMS Prospect Manager

Prospect Manager should be used at the outset of any new relationship or prior to a marketing campaign to ensure a business relationship does not exist with another Partner. Any enquiries received following a Long-Term Care event should therefore follow the PROMS process before any advice is given.

Ring-Fencing – consideration should also be given to care home residents that may already be clients of another Partner

For more information, please refer to the PROMS page of the intranet [here](#).

### Introducer Agreements

Depending on your business relationship with any care provider, there may be a need for an Introducer Agreement to be put in place.

Rack cards – you may arrange with the care home to display your business card or other promotional material in the reception/communal area of the care home that Individuals can peruse at their discretion. This type of arrangement is not normally considered a direct introduction, and an Introducer Agreement will not usually be required. However It Isn't generally considered to offer a high success rate.

Where there is an intention to establish a more commercial relationship, it is likely that an Introducer Agreement will be required – for example, where Partner information is being provided in the care home information pack. The Regulatory Authorisations process looks to enable these arrangements to be put in place as efficiently as possible. Introducer arrangements are common within financial services, as it can often provide other businesses with the option to support their customers' needs beyond what they can offer themselves, creating added value.

Further information about Introducer Agreements can be found [here](#).

### Financial Promotions

If you wish to make any amendments to the pre-approved marketing material, or create your own presentation content or promotional/advertising material, approval will need to be obtained from Financial Promotions before the event. For more Information [Financial Promotions intranet page](#)

Promotional material created to support seminars/events being organised/hosted by third parties, any promotional material created to support the event that advertises the Partner attendance, should still be approved by Financial Promotions.

For more Information [Financial Promotions intranet page](#) [Financial Promotions Checklist](#)

### Accreditation

It is important to be aware that this guidance is only applicable to Partners who are suitably accredited and hold a Long-Term Care licence. Further information relating to Long-Term Care Accreditation can be found [here](#).

Partners who do not hold an appropriate licence are not permitted to promote themselves as specialists in Long-Term Care in any capacity, and as such, are prohibited from providing seminars on this subject. However, consideration will be given to joint seminars with another Partner who holds the LTC Accreditation, providing it is clear that any resulting advice relating to a long term care client is provided by the licensed Partner.

### Hints & Tips

- ◆ Getting in front of the right person is key
- ◆ Cold calling generally not successful
- ◆ Use opportunity to work with a care home if new resident taking out INA
- ◆ Use Care Cap as an opportunity to start initial discussions
- ◆ Not just advice for residents... what about the care home too?