Conflicts, Referrals & Specialist Escalation Policy

Keeping planning independent while bringing the right expertise to the right problem

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Applies to	Academy of Life Planning Limited and, where incorporated into their professional agreement, Academy-accredited or licensed practitioners.
Purpose	To identify and manage conflicts, keep referrals transparent, and ensure specialist expertise is introduced when the issue is beyond the practitioner's competence or permissions.
Core principle	The client remains at the centre. A referral should solve a defined problem, not transfer ownership of the client's whole financial life.
Status	This is an Academy policy. It does not replace any stricter legal, regulatory or professional-body requirement applying to a practitioner.

1. Purpose and scope

Total Wealth Planning often requires more than one form of expertise. A good planner does not try to become the client's solicitor, tax adviser, accountant, actuary, regulated investment adviser, pension transfer specialist, debt adviser, therapist or safeguarding professional.

This Policy sets the Academy's standards for identifying conflicts of interest, making introductions or referrals, and escalating matters to an appropriately authorised or qualified specialist.

The objective is client-led, federated expertise: the specialist is brought to the problem that requires specialist competence while the client retains an intelligible view of the whole plan.

2. Principles

Principle	Standard
Client interest first	A referral or specialist choice must not be driven primarily by the Academy's or practitioner's commercial interest.
Transparency	Material relationships, referral arrangements, remuneration and conflicts should be disclosed before the client relies on the introduction.
Freedom of choice	The client should remain free to choose another suitable specialist unless a specific service structure makes that impracticable and this is clearly disclosed.
Proportional escalation	Bring in specialist expertise where the consequences, complexity, uncertainty, competence or legal perimeter justify it - not merely because a professional relationship exists.
No disguised intermediation	A referral must not be used to disguise an activity that the Academy or practitioner is not authorised or competent to undertake.

Clear accountability	Each professional remains accountable for the work they actually perform.
Continuity of understanding	The client should not lose agency or understanding when a specialist becomes involved.

3. What is a conflict of interest?

A conflict exists where a personal, financial, professional or organisational interest could reasonably influence - or appear to influence - the impartiality of planning, analysis, a referral or the presentation of options.

Examples include:

- receiving a referral fee, commission, affiliate payment or revenue share;
- having an ownership, employment or family connection with the specialist or firm introduced;
- receiving reciprocal introductions or other non-cash benefits;
- having a commercial partnership, sponsorship or licensing relationship with a provider;
- holding a personal financial interest in an option being discussed;
- being rewarded for retaining a client, increasing assets, making a transaction or generating a particular outcome;
- having a personal dispute, loyalty or relationship that could impair objective judgement; or
- holding two professional roles whose incentives or duties may point in different directions.

4. Identifying and managing conflicts

Before acting where a conflict may exist, the practitioner should:

- identify the nature of the conflict;
- assess whether it is material to the client's decision;
- consider whether the conflict can be managed without compromising fair judgement;
- disclose the material facts in plain language before the client commits;
- record the conflict and the action taken where the matter is significant; and
- decline or withdraw from the affected work if the conflict cannot be managed adequately.

Disclosure is not a cure for every conflict. If the conflict is so strong that a reasonable client could not expect impartial judgement, the work should be restructured, independently reviewed or declined.

5. Conflicts that are not acceptable

The Academy does not permit a practitioner to:

- conceal a material referral payment, ownership interest or commercial relationship;
- present a paid or reciprocal introduction as independent when it is not;
- steer a client towards a product, provider or specialist primarily because the practitioner benefits financially;
- make an undisclosed side agreement that depends on the client's subsequent transaction;
- misrepresent the Academy's independence, accreditation or professional status to support a commercial referral; or
- accept an incentive that materially compromises the client's ability to receive impartial planning.

6. What a referral means

A referral or introduction means identifying or connecting a client with another person or organisation that may be able to provide a service outside the Academy's or practitioner's scope.

Unless expressly agreed otherwise, an introduction is not a guarantee, endorsement of every aspect of the specialist's service, joint venture, agency relationship or transfer of liability.

The specialist is responsible for their own advice, recommendations, professional judgement, fees, regulatory permissions, insurance, client agreement and complaints process.

7. Before making a referral

The planner should be able to explain:

- what problem or specialist question has triggered the referral;

- why the issue is outside, or better handled outside, the planner's own scope;
- what type of professional expertise is required;
- whether the client is free to choose another suitable professional;
- whether the planner or Academy receives any benefit from the introduction;
- what information, if any, the client has authorised to be shared; and
- which parts of the overall plan remain with the client and planner.

8. When specialist escalation may be appropriate

Specialist	Typical escalation trigger
FCA-authorised investment adviser	A personal recommendation concerning a particular regulated investment, regulated arranging or another FCA-regulated activity.
Pension transfer specialist	A matter requiring regulated advice on transfer, conversion or retention of safeguarded pension benefits.
Solicitor / legal specialist	Reserved legal activities, litigation, complex trusts, legal ownership disputes, contracts, probate or other matters requiring legal advice.
Tax adviser / accountant	Material tax planning, tax compliance, business accounts, complex corporate or personal tax questions, or matters where tax treatment is central to the decision.
Actuary	Complex actuarial valuation, pension or longevity analysis beyond the planner's competence.
Debt specialist	Formal debt solutions, insolvency, regulated debt counselling or debt-adjusting where applicable.
Safeguarding / fraud / law-enforcement support	Suspected coercion, financial abuse, exploitation, fraud or circumstances requiring protective or investigative action.
Health / mental-health professional	Where health, capacity, acute distress or psychological risk is central and beyond financial planning competence.
Other specialist	Any matter where the planner lacks sufficient competence or where an independent specialist view would materially improve the quality or safety of the decision.

9. Specialist escalation test

A planner should actively consider escalation where one or more of the following applies:

- the matter falls outside the planner's competence or professional experience;
- the activity requires a statutory permission or qualification the planner does not hold;
- the potential loss or irreversible consequence of error is high;
- the facts are disputed, legally complex or technically uncertain;
- a conflict of interest reduces confidence in the planner's impartiality;
- the client specifically requests independent specialist advice;
- the matter involves a vulnerable client or potential safeguarding issue;
- the planner is relying on assumptions that require specialist validation; or
- peer review indicates that an independent specialist should be involved.

10. FCA-regulated activity

The Academy's planning model is broader than regulated retail investment activity. However, where a particular activity falls within the FCA perimeter, the appropriate authorisation must exist before that activity is carried on.

Academy accreditation does not confer FCA authorisation. A planner who is not appropriately authorised must not provide a regulated personal recommendation, arrange a regulated transaction, or present a referral as a device for doing indirectly what they could not lawfully do directly.

Where regulated advice is required, the regulated firm is responsible for that regulated advice. The Academy or planner may continue to support the client's wider Total Wealth Plan, provided roles and responsibilities remain clear.

11. Dual-role practitioners

Some practitioners may separately operate under FCA authorisation, an appointed representative arrangement, a legal or accountancy practice, or another professional capacity.

Where the same person operates in more than one capacity, they should:

- tell the client which entity and professional capacity applies to each service;
- use the correct client agreement and disclosures for each role;
- avoid implying that Academy services inherit protections that belong only to a separate regulated service;
- avoid using a regulated relationship to create unnecessary product bias within Total Wealth Planning;
- keep records sufficiently clear to show which capacity was being used; and
- manage remuneration and referral conflicts transparently.

12. Referral fees, affiliates and other benefits

A referral arrangement is not prohibited merely because a fee or other benefit exists. The controlling issue is whether it is lawful, transparent and compatible with impartial client-centred planning.

Where the Academy or practitioner receives a material referral fee, affiliate payment, reciprocal introduction, revenue share or other benefit connected to the client's choice, the existence and nature of that benefit should be disclosed before the client acts on the referral.

Where practicable, the disclosure should state whether the amount is fixed, percentage-based or otherwise linked to the client's transaction. If the exact amount cannot reasonably be known in advance, the method of calculation should be explained.

13. Unpaid and pro bono referrals

A referral may be entirely unpaid. The absence of a referral fee does not remove the need to consider other conflicts such as friendship, reciprocal business, organisational affiliation or reputational interest.

Equally, providing help without charge does not create authority to act outside competence or legal permissions.

14. Selecting specialists and due diligence

Where the Academy or practitioner actively recommends a named specialist rather than simply identifying a category of professional, reasonable care should be taken in the selection process.

Depending on the risk and type of specialist, checks may include:

- current regulatory or professional registration where relevant;
- scope of permissions or practising rights;
- relevant qualifications and experience;
- professional indemnity insurance where appropriate;
- disciplinary or public enforcement information that is reasonably available and material;
- the specialist's service model, fees and complaints arrangements; and
- whether there is any conflict that should be disclosed to the client.

Due diligence is proportionate and time-sensitive. A historic check is not a lifetime guarantee. The client remains free to carry out their own checks and choose an alternative specialist.

15. Sharing client information with specialists

Client information should not be shared merely because a referral has been suggested. The planner should obtain appropriate authority and share only information reasonably necessary for the specialist to assess or perform the requested work.

Where the client prefers, they may pass documents or planning outputs to the specialist directly.

Special-category, health, identity, fraud-related and highly sensitive financial information requires particular care. The Academy's Privacy Notice and applicable data-protection law apply.

16. Working with the specialist

Where the client wants coordinated working, the planner may help frame the specialist question, organise relevant information, attend meetings with consent, translate specialist conclusions into the wider plan and help the client understand resulting trade-offs.

The planner must not alter, dilute or misrepresent the specialist's conclusion. If the planner disagrees materially with a specialist, the disagreement should be made explicit and, where necessary, resolved through clarification, second opinion or a different specialist.

17. Avoiding fragmented accountability

Specialist escalation should not result in everyone assuming that somebody else owns the problem. The client should understand who is responsible for each part of the work.

For material cases, the planner should clarify:

- the question being answered by the specialist;
- what information the specialist is relying on;
- whether the specialist is advising, implementing or merely providing information;
- what decision remains with the client;
- what the Total Wealth Planner will do after the specialist work is complete; and
- what follow-up, monitoring or review - if any - has been agreed.

18. When the planner should decline or pause work

A planner should pause, decline or withdraw from work where:

- continuing would require activity outside competence or legal permission;
- the client asks the planner to conceal information from another professional or authority where doing so would be improper;
- a conflict cannot be managed fairly;
- the planner cannot obtain information necessary to perform the work with reasonable care;
- the client is being coerced or exploited and ordinary planning cannot safely continue;
- the engagement has become abusive, threatening or unlawful; or
- another specialist is clearly necessary and the client refuses to obtain that input despite a material risk of harm.

19. Records

For a material referral or escalation, records should be proportionate but sufficient to show:

- why escalation was considered necessary or appropriate;
- what type of specialist was identified;
- any material conflict or referral benefit disclosed;
- the client's consent to relevant information sharing;
- the specialist selected, where one was named;
- the respective responsibilities of the parties; and
- any significant conclusion fed back into the client's wider plan.

20. Complaints and concerns about a specialist

A complaint about the specialist's own service should normally be directed to that specialist or firm under their complaints process.

A complaint that the Academy or planner made a misleading referral, concealed a conflict, failed to disclose remuneration, or acted without reasonable care in the referral process may be considered under the Academy's Complaints Procedure where the Academy is responsible for the conduct complained of.

If information raises a serious client-protection concern about an Academy-accredited practitioner or a specialist used within the Academy network, the Academy may consider whether further referrals should be paused and whether accreditation, licensing or other governance action is appropriate.

21. Conflicts and referral register

The Academy will maintain a proportionate internal record of standing commercial referral arrangements and other material conflicts relevant to its services.

Accredited practitioners are expected to maintain their own appropriate record of material conflicts and referral arrangements within their practice.

22. Review and governance

This Policy will be reviewed at least annually and sooner where there is a material change in law, Academy services, professional standards, referral arrangements or identified consumer risk.

Where a practitioner is subject to a stricter legal, regulatory or professional-body requirement, the stricter applicable obligation takes precedence.

23. Company information

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