

# BECOMING A CLC REGULATED BUSINESS

## FACTSHEET 3

### Compliant Polices

Factsheet 3 is aimed at helping potential CLC Practice applicants to think about the types of polices that a compliant business should have in place.

Polices should be written so that the purpose of policy can easily be incorporated into the daily running of the business. An effective policy will help the business actively mitigate risk and activity and protect the interests of the business, its Clients and any third parties.

### What makes a good written policy?

Polices should:

- be written using simple, clear, concise language;
- be reviewed regularly and updated;
- avoid jargon and overly technical descriptions;
- be written assuming the user has a basic knowledge of the specific policy and procedure being described;
- clearly differentiate between "policy" AND "procedure";
- consider why the user will need the information and what the user will likely be doing when looking for information; and
- provide accurate contact information for clients that have questions or situations that fall outside of the normal situation.

### What makes a policy effective?

Polices should be:

- familiar to all staff, so that they can be explained to clients and third parties; and
- current, reflecting changes as they happen to ensure the policy remains useful.

### Different types of policies

As a new-start-up business you may be starting from scratch when developing your companies polices.

Typically, policies are intended to:

- A. safeguard client interests;
- B. safeguard employment rights;
- C. uphold regulatory compliance (as mentioned in the CLC Frameworks and Codes); and
- D. ensure business continuity arrangements.

Although polices to protect employees are important and must be put in place for statutory reasons; polices that should be included in your Practice Application are those that fall into categories A, C and D.

## Policies to Safeguard Client and Third Party Interests

*It is likely that clients will not ask to see these policies but it is important clients are made aware that they are easily accessible if needed. For example...*

- Client Terms of Engagement
- Cybercrime
- Fraud prevention and Anti-Money Laundering

## Policies to uphold Regulatory Compliance

For example...

- Complaints
- Equality and Diversity  
AND
- those needed to support the CLC's Code of Conduct

## Policies to ensure business continuity arrangements

For example...

- Business Continuity Planning –covering areas such as:
  - Terrorism 'Response Plan'
  - Cyber Attack 'Response Plan'
  - Fraud 'Response Plan'
  - General areas of contingency – such as
    - Locums - planned and unplanned absences for key personnel;
    - Succession planning;
    - Financial sustainability; loss of work, PII excess payments.

## Some Example Policies

Prospective Practice Licence applicants are welcome to use the selection of example policies provided in the new start up business pack. The policy examples provided, although not exhaustive, provide a useful starting point.