

Property Owners Insurance UK

Product Approval Process and Target Market

Intermediary Target Market and Product Release Information

This information is for **broker use only** and **not intended for customer use**

Product Name:	Property Owners Insurance UK	
Status:	New Product Development	
	Existing Product Refresh	
	Product Change	
	Other 🗌	
Live Date:	Currently Live – 2023 Review	
Product Type Description:	Property Owners Insurance, catering for residential, commercial and/or mixed portfolios.	
	Additional information about the product can be found at:	
	<u>https://insurance.archgroup.com/international/uk/offering/property-</u> owners/	
Characteristics and features of the product:	This product is designed for businesses, individuals or institutions and has been designed to enhance our previous separate commercial property and residential property offerings.	
	This includes residential leaseholders ('policy stakeholders') who are:	
	 A tenant within the meaning of Section 30 of the Landlord and Tenant Act 1985; and Liable to pay a service charge as defined in Section 18 of the Landlord and Tenant Act 1985; and (where relevant) a recognised tenants' association within the meaning of Section 29 of the Landlord and Tenant Act 1985. 	
	The following covers can be included; property damage, loss of rental income following property damage, equipment breakdown, legal liabilities for third party injury and property damage, employers'	

Target Market:

Who is this product designed for?

This product has been designed to meet the needs of a variety of businesses, including but not limited to single site risks, multi-site portfolios, as well as investors and private individuals, property owning organisations, property management organisations, and policy stakeholders within the United Kingdom, Isle of Man and The Channel Islands.

Who is this product not designed for?

Home owner-occupiers. Customers with property outside of the territorial limits specified above.

Vulnerable Customers:

(Select ALL that apply)

Arch recognises that vulnerability characteristics can present themselves, even in the case of commercial policies. These risks have been factored into our product level reviews. Information regarding expectations over and above this standard likelihood are captured here.

Broker Guidance: You should ensure that you assess the presence of vulnerable customer characteristics, including policy stakeholders, and verify the suitability of the product should they arise.

Did any Vulnerable customer characteristics present themselves as risks during the development of the product?

 Health – Conditions that affect ability to carry out day-to-day tasks
 □

 Life events - Such as bereavement, job loss or relationship breakdown
 □

 Resilience – Low ability to withstand financial or emotional shocks
 □

 Capability –Low knowledge of financial matters or low confidence
 □

 None of the Above
 □

Arch's Role:	Manufacturer	\boxtimes
(Select ALL that apply)	Co Manufacturer	
	Distributer	
Distribution Channel(s):	Broker (Open Market)	\boxtimes
(Select ALL that apply)	Broker (Single broker or Platform)	
	Direct to Commercial Client (define size of client)	
	Direct to Consumer	
	Delegated arrangements	\boxtimes
	Other	
Distribution Method(s):	Face-to-Face ['F2F']	\boxtimes
(Select ALL that apply)	Telephone	\boxtimes
	Online Journey	
	Webchat	
	Postal	
	Email	\boxtimes
Type of Sale: (Select One)	Advised 🗆 🛛 Advised & Non-Advised 🖂	Non-Advised 🗌

Property Owners UK – Distributor Summary

Summary of Product Testing:

Arch has in place various processes to test products

- prior to bringing to the market;
- where there is a significant adaptation of the product;
- when the target market changes significantly;
- when legal and / or regulatory change brings within scope, additional parties who are not named parties to the insurance contract; and
- When MI indicates that further testing is warranted.

Over its lifetime, testing will consider whether a product meets the identified needs, objectives and characteristics of the target market. Testing is carried out in both a qualitative and quantitative manner. This may include - but is not limited to - areas such as examination of complaints, claims volumes and frequencies, claim declinatures, remuneration arrangements, policy cancellations, retention rates, loss ratio analysis and external analysis/benchmarking against existing products. Policy wordings, summaries, IPIDs and other customer communication documents are reviewed as part of this process.

For multi-occupancy buildings insurance, testing will extend to include how compliance with the disclosure requirements in ICOBS 6A.7 is demonstrated by those parties involved within the distribution chain.

The presence of vulnerable customer characteristics is reviewed at Product Development stage and throughout the ongoing Product Review Process.

This is a long-standing product in the market that has a proven track record of providing coverage for the specific requirements of its target market. The distribution channel is believed to be appropriate, and remuneration levels reasonable and in line with market standards, but this is subject to the current review process set out in the next section.

Product Review Process:Arch maintains a stringent Product Review Process, full details of
which are contained in our Product Oversight and Governance Policy.
The Process is in line with FCA PROD and Consumer Duty requirements
and is conducted at least annually, or more frequently when
considered necessary.

This product continues to be reviewed in the context of ICOBS 6A.7, to assess both distributor compliance with the new disclosure requirements, and the suitability of MI which allows an appropriate fair value analysis to be documented in relation to policy stakeholders.

Risks and Cost:

The **risks** and **costs** have been reviewed through Arch's Product Review process, as part of product development. Due to the number of risks written under any given product, average premiums have been used to

assess value – with averages allocated to differing levels of cover or limits where appropriate.

For multi-occupancy buildings insurance involving policy stakeholders, the analysis of costs must include a comparative and proportionate assessment of each policy stakeholder's insurance premium payment, considering each policy stakeholder's individual property value, and its proportionality against the overall premium cost (to the policyholder customer) and combined property values.

For mixed property portfolios involving residential and commercial leaseholds, the cost analysis should further assess the proportionality between commercial leaseholders and policy stakeholders (holding a residential leasehold only).

You should ensure that, in assessing the suitability of the product, you identify the risks posed to the insured and all policy stakeholders, and that all costs associated are appropriate to their needs, including any additional fees you may add to the premium paid or additional products offered alongside Arch's core offering. Where Arch has been made aware of add-ons, or additional fees, these have featured in our value assessments.

Product Value is the relationship between the overall price to the customer and the quality of the product(s) and or services provided. Where policy stakeholders are involved, Product Value also includes the fairness of the proportionate cost allocated to them as tenants, the fairness of the administrative costs incurred within the distribution chain (to which they contribute), and quality of the insurance information they are provided with (which must be clear, fair, and not misleading).

Arch has considered this product provides fair value to customers in the target market historically. We have reached this conclusion after consideration of the price, benefits and features, available MI and the distribution chain involved (this is a non-exhaustive list).

The ongoing fairness of this product will continue to be determined based on the outcome of the current ICOBS 6A.7 review.

Conflicts of Interest: Arch has identified no conflicts of interest in the manufacture, underwriting and distribution of this product historically.

As part of the ICOBS 6A.7 review process, the presence of conflicts (actual or potential) is reassessed in line with ICOBS 6.A.7.14 R.

Should you become aware of any information that leads you to believe a conflict of interest may be present, please contact Arch without delay.

Product Value:

Arch Product Oversight and Governance Arrangements

Following the implementation of the Insurance Distribution Directive ['IDD'] on 1st October 2018, the Pricing Practices changes from 1st October 2021 and 1st January 2022 and Consumer Duty requirements as at 31st July 2023, this document outlines Arch's approach to Product Oversight and Governance to demonstrate the way we design, monitor, review and distribute our insurance products.

When regulatory change necessitates a revision to Arch's Product Oversight and Governance Arrangements, these revisions will be highlighted in this Distributor Summary, regardless of whether the revisions represent a transitional phase or a final position (which articulates how regulatory requirements are demonstrated).

Why are we telling you this?

As part of the regulatory framework Arch adheres to, we are informing you of the product governance arrangements we have in place for designing, monitoring, reviewing, and distributing this product. The key areas outlined cover the various processes we have in place to monitor our products as well as the information we may require from brokers/coverholders (distributors) throughout the lifecycle of a product.

Product Development Process

The product development process has been designed to ensure that we have a consistent approach to the development of new products, or significant revisions to existing products.

Product Review Process

The product review process ensures that those already within the market continue to be designed in a way that meets the needs of the target market and offers fair value to customers.

Information for brokers and other distribution partners

As we carry out these reviews, we may request information from distributors to be able to evidence that our products are being distributed correctly - examples of this could be evidence that the product has been sold to the right target market or complaints received relating to the product. In most instances we will hold this data already on our systems, but there will be occasions when we may request it from relevant distributors. We will endeavour to provide adequate notice where we seek this information from you.

Further Information- If you have any questions, please contact your Arch representative.