



## Initial Disclosure Document

*Important information about our services and how we work with you*

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## Who are we and what do we do?

**ClearView Wealth Management Ltd** is an independent financial planning firm, committed to helping clients make confident, informed decisions about their financial future. Our approach is **client-centric, long-term, and values-driven**, focused on building trusted relationships, providing clear, evidence-based advice and delivering consistent outcomes.

ClearView Wealth Management Ltd is an appointed representative of ValidPath Limited, which is authorised and regulated by the Financial Conduct Authority (Firm Reference Number 197107). You can check this on the FCA Register at: [www.fca.org.uk/register](http://www.fca.org.uk/register) or by calling 0800 111 6768.

The FCA is the independent regulator of financial services in the United Kingdom. Its role is to protect consumers, ensure firms operate fairly, and maintain confidence in the financial system.

This document explains who we are, how we work, and what you can expect from us. It's designed to help you understand our services before we begin working together.

## What can we do for you?

**Investments & pensions** – We provide independent advice. We will advise and make a recommendation for you after we have assessed your needs. Our recommendation will be based upon a comprehensive and fair analysis of the market.

**Insurance** – We offer products from a range of insurers for Term Assurance, Mortgage Protection, Critical Illness, Income Protection & Private Medical Insurance. We will advise and make a recommendation for you after we have assessed your needs and objectives and will provide a personal recommendation based on a fair and personal analysis of your circumstances. You will be presented with an illustration, prior to application, which will include any commissions payable.

**Home Finance Products** – We offer lifetime mortgage contracts from the whole market. We do not offer regulated mortgages, home reversion plans and equity release products. We will advise and make recommendations for you on lifetime mortgages after we have assessed your needs.

For all the services described above we will complete a detailed fact find so we can understand your circumstances, specific needs and objectives to determine if these services are suitable for you. We will then undertake research in order to provide a personal recommendation(s) and related information relevant to your individual circumstances. If, after due consideration you would like to accept any or all of our recommendation(s), we will then implement them and arrange any products and/or related services on your behalf.

Once your financial plans are in place it is important to keep them under review. Subject to the type of services you require from us, we can continue to act on your behalf through our ongoing review service. Alternatively, for those who prefer a more transactional or ad-hoc 'pay as you go' service, we are also happy to provide our services as and when you need them. Ultimately, whichever type or level of service you require from us we will act in your best interests at all times.

**Further details about these and other related services we provide are contained in the pages below. This also confirms the typical cost and how you can pay us for them.**



When we have discussed and agreed with you the services that we are to provide, we will confirm this to you in a **Client Agreement**. This will describe the scope and specific services to be provided, including any ongoing services, the cost and how it can be paid for.

## What will you pay for our services?

### **Investment**

You will pay for our services on the basis of the summary provided below. We will discuss payment options with you and answer any questions you have. We will not charge you until we have agreed with you how we are to be paid.

### Non-Advised Services

Where you retain our services to handle a specific transaction on your behalf, but without the requirement for advice, we will charge you a single fixed fee for such a service, which will be disclosed in our Client Agreement. Your signature of that Agreement is our authorisation to proceed with that transaction.

### Advised Services

Our **Initial Advice** and **Ongoing Advice** services are values-driven and we determine the level of our advice fees based on the complexity of your financial position, objectives and planning requirements. We group these factors into the following five categories:

1. **Life Stage** – e.g. *Accumulation, pre-retirement, drawdown/decumulation*
2. **Wrapper Structure & Complexity** – e.g. *Number and complexity of wrappers and financial products involved or reviewed*
3. **Tax Planning Intensity** – e.g. *Tax-driven decisions, strategy and/or third-party specialist involvement*
4. **Client Engagement Level** – e.g. *Number and complexity of wrappers and financial products involved or reviewed*
5. **Family / Estate Complexity** – e.g. *Considerations towards complex family, intergenerational, or estate planning matters*

## Initial Advice Services

Our initial advice fees reflect the level of financial planning, tax strategy and decision-making support our clients need — not simply how much money is invested.

<b>Foundation Planning</b>	<i>Typically for clients with up to £300,000</i>
Designed for clients with straightforward financial needs who want professional advice and clear direction, without the cost or complexity of full holistic planning.	
<i>Initial fees equal 1% of assets under advice, min. £1,500</i>	

<b>Core Planning — Standard Advice</b>	<i>Typically for clients with over £300,000</i>
Holistic financial planning taking into account full portfolio, guidance on contributions, wrappers, and basic tax matters. Ideal for accumulation or early retirement clients needing adviser-led support.	
<i>Initial fees range between £3,000 - £4,500 (based on complexity)</i>	

<b>Advanced Planning — High-Value, High Involvement</b>	<i>Typically for clients with over £500,000</i>
Comprehensive planning with cashflow modelling, tax strategy and/or drawdown advice. Designed for pre-retirement clients or those with multiple wrappers.	
<i>Initial fees range between £5,250 - £6,750 (based on complexity)</i>	

<b>Strategic Planning — Bespoke, Complex Planning</b>	<i>Typically for clients with over £1million</i>
Bespoke, high-impact advice for complex situations including full drawdown, estate and IHT planning, intergenerational wealth, and business considerations.	
<i>Initial fees range between £7,500 - £9,000 (based on complexity)</i>	

### Examples – Initial investment advice

For example: If you required investment advice on reviewing an existing Stocks & Shares ISA portfolio, valued at £200,000, with no additional financial planning needs, the Foundation Planning fee of 1% would apply. ( $£200,000 \times 1.0\% = £2,000$ )

For example: If you required holistic advice across your investment and pension portfolio, reviewing several existing policies valued at £350,000, the Core Planning fee of £3,000 would apply. ( $£3,000 / £350,000 = \text{effective charge of } 0.86\%$ )

For example: If you required advice on your pension income options at retirement, reviewing several existing policies and investment plans, valued at £475,000, the Core Planning fee of £4,500 would apply. ( $£4,500 / £475,000 = \text{effective charge of } 0.95\%$ )

For example: If you required advice on your drawdown pension options, together with reviewing multiple other investment policies and estate planning matters, valued at £800,000, the Advanced Planning fee of £6,750 would apply. ( $£6,750 / £800,000 = \text{effective charge of } 0.84\%$ )

For example: If you required complex advice on your overall financial arrangements following a business sale, resulting in investment, pension and inheritance tax planning considerations, valued at £1.25m, the Strategic Planning fee of £7,500 would apply. ( $£7,500 / £1.25m = \text{effective charge of } 0.60\%$ )

## Ongoing Advice Services

We offer a professional, clear, evidence-based ongoing advice and annual review service charged on a fixed fee basis, agreed with you annually in advance and chargeable on a monthly basis. This pays for essential infrastructure, regulatory overheads and the provision of our annual review service. We will recommend the service to you where we consider this to be suitable for your needs.

Our ongoing service includes the following:

- ✓ Annual valuation report and commentary on changes
- ✓ Annual review meeting with your adviser
- ✓ Review and assessment of your financial circumstances and suitability of your arrangements
- ✓ Review and assessment of any tax considerations or relevant changes in legislation
- ✓ Online access to investment valuations
- ✓ Liaison with your other professional advisers as required
- ✓ Access to your adviser and/or support team at any time between review meetings

<b>Foundation Planning</b>	<i>Typically for clients with up to £300,000</i>
Designed for clients with straightforward financial needs who want professional oversight and clear direction, without the cost or complexity of full holistic planning.	
<i>1% of invested assets (subject to minimum of £1,200)</i>	

<b>Core Planning — Standard Ongoing Advice</b>	<i>Typically for clients with over £300,000</i>
Holistic financial planning with annual review, portfolio oversight, and guidance on contributions, wrappers, and basic tax matters. Ideal for accumulation or early retirement clients needing adviser-led support.	
<i>Annual fees range between £3,000 - £4,500 (based on complexity)</i>	

<b>Advanced Planning — High-Value, High Involvement</b>	<i>Typically for clients with over £500,000</i>
Comprehensive planning with cashflow modelling, tax strategy, drawdown advice, and mid-year reviews. Designed for pre-retirement clients or those with multiple wrappers requiring regular strategy updates.	
<i>Annual fees range between £5,250 - £6,750 (based on complexity)</i>	

<b>Strategic Planning — Bespoke, Complex Planning</b>	<i>Typically for clients with over £1million</i>
Bespoke, high-touch regular advice for complex situations including full drawdown, estate and IHT planning, intergenerational wealth, and business considerations. Provides proactive, ongoing guidance tailored to individual circumstances.	
<i>Annual fees range between £7,500 - £9,000 (based on complexity)</i>	

### Examples – Ongoing investment advice service

For example: If you required ongoing advice on a pension with ongoing contributions, valued at £250,000, with no additional financial planning needs, the Foundation Planning fee of 1% would apply.  
(£250,000 x 1.0% = £2,500)

For example: If you required ongoing advice on your personal pension in drawdown, valued at £325,000, the Core Planning fee of £3,000 would apply. (£3,000 / £325,000 = effective charge of 0.92%)

For example: If you required ongoing advice on your various investments and pensions, including multiple adviser meetings throughout the year, valued at £475,000, the Core Planning fee of £4,500 would apply.  
(£4,500 / £475,000 = effective charge of 0.95%)

For example: If you required ongoing advice on your pension in drawdown, as well as your other investment policies and estate planning strategies, valued at £800,000, the Advanced Planning fee of £6,750 would apply. ( $£6,750 / £800,000 = \text{effective charge of } 0.84\%$ )

For example: If you required ongoing complex financial planning advice involving investments, pensions or Trusts with materially different tax considerations and requiring specialist planning expertise, valued at a total of £1.2million, the Strategic Planning fee of £8,250 would apply. ( $£8,250 / £1.2\text{million} = \text{effective charge of } 0.69\%$ )

**Increases in advice fees are only applicable where complexity and planning involvement rise. Two clients with the same portfolio size can pay different fees — because the work involved can be very different.**

### **Insurance**

We charge hourly fees of £265 per hour for *Chartered Financial Planner* time, £150 per hour for *Paraplanner (technical report writer)* time and £75 per hour for *Technical Administrator* time for advice and implementation, or an agreed project fee as detailed in the Client Agreement.

This will generally be offset against any commission received by us should you proceed with a recommended product. You will receive a quotation that will confirm any applicable commission payable as well as any other fees or commissions relating to any particular insurance policy.

### **Home Finance Products (Lifetime Mortgages)**

There is no upfront fee, however, we will receive a procuration payment from the lender on completion of the mortgage. If this does not cover our minimum charge of £1,995, we will invoice you for the difference on completion of the mortgage.

Typical example assuming the lender pays us 2% of your borrowing amount:

If you borrowed £50,000, we would receive £1,000 from the lender as a procuration fee. Your fee payable would be £995.

We would make you aware if there is any fee to pay and the amount in our recommendation report. We will also give you an idea during the initial meeting so you are aware upfront of the potential payment you would have to make and the different ways you can pay for this.

You will receive a key facts illustration when considering a particular lifetime mortgage which will tell you about fees relating to it.

What happens if you no longer wish to proceed after instructing us to advise you:

We reserve the right to charge you for the work we have completed to date, up to a maximum of £1,995, which is our minimum charge as stated above.



Our actual charges and fees will be agreed with you before we do any work, and we'll explain your payment options too.

## Regular premium savings & investments

You can choose to pay your implementation fee through your policy. The payment will be deducted proportionately from each monthly contribution, and it normally needs to be paid within the first 12 months of your plan. The deductions are limited to a maximum of 50% of each monthly contribution and any balance due at the end of the first year will be payable by the same monthly instalments until settled in full. Please note that if you decide to pay this charge through your policy and payments to the policy subsequently cease, we will calculate total payments received to date and charge you the balance.

## Payment options

We offer a range of payment options including:

- Settling your adviser charge through a single payment: Invoice plus payment by client within 14 days of receipt on completion of work. Whether you buy a product or not, you will pay us an adviser charge for our advice and services, which will become payable upon completion of our work.
- Settling your adviser charge by instalments: Where no ongoing service is being provided, and only where regular premium products are recommended, we offer the facility to pay by instalments through your recommended product.

If you buy a financial product, you can choose to have your adviser charge deducted from the product through instalments. Although you pay nothing to us up front, that does not mean that our service is free. You still pay us indirectly through deductions from the amount you pay into the product. These deductions will pay towards settling the adviser charge. These charges could reduce the amount left for investment. If you select this method of payment, we will detail the terms in our Adviser Charging Agreement.

- Paying through other arrangements: An agreed charge to be taken from the product, and paid to us by the product-provider, rather than you writing us a cheque.
- Payment for ongoing services: Annual retainer paid to our firm out of the product in order to pay for annual review services.

## Client satisfaction

If at any time you would like to discuss with us how our service could be improved, please do not hesitate to contact us.

If you have a complaint about financial loss, material inconvenience or material distress, please refer this to our Complaints Officer at ValidPath Limited, Complaints Department, The Maltings, East Tyndall Street, Cardiff, CF24 5EA who will investigate the matter in full and provide you with a formal analysis of their findings. If you are not satisfied with their response, you have the right to refer the matter to the Financial Ombudsman Service (FOS) within 6 months of the date of their letter.

We reserve the right to reclaim costs and expenses reasonably incurred by the Firm or ValidPath Limited in defending any complaints to the Ombudsman or Courts or similar system which are of a frivolous or vexatious nature. This applies to circumstances surrounding any products or advice given from this point, as well as previously. If the complaint is not upheld, we will recover whatever costs, if any, are allowed.

## Are we covered by the Financial Services Compensation Scheme (FSCS)?

We are covered by the Financial Services Compensation Scheme (FSCS). You may be entitled to compensation from the scheme if we cannot meet our obligations. This depends on the type of business and the circumstances of the claim. Typical limits include:

- **Investments** – Up to £85,000 per eligible person, per firm
- **Deposits** – Up to £120,000 per person, per firm (£240,000 for joint accounts)
- **Insurance** – 90% of the claim (100% for compulsory insurance), no upper limit
- **Lifetime Mortgage advice** – Up to £85,000 per eligible person, per firm

Further information about compensation scheme arrangements is available from the FSCS.

Our authorising Network (ValidPath Limited) holds compliant Professional Indemnity Insurance that satisfies FCA requirements.

**If anything in this document is unclear, please ask. We're always happy to explain.**