thrive

Consumer Duty

Consumer Support Review 2025

Product Details.

Description of the product

Thrive is a digital employee benefits platform that provides access to a curated range of third-party benefits. The platform facilitates engagement between employers, employees, and benefit providers but does not provide regulated financial advice.

Describe the key features and benefits of the product

- Centralised access to employee benefits
- Curated selection of providers
- Digital platform with user-friendly interface
- Employer-sponsored access at low cost
- Ongoing engagement and benefit discovery

Review Completed By

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Growth Director

Events.

Has there been an event which could result in the product posing a risk to customers?

(Event = any concerns identified during review about the product or its literature that may be perceived as a consumer harm).

Yes.

If yes: explain the risks now posed to customers

An issue was identified whereby a connected company was appointed as an Appointed Representative (IAR) of a directly authorised firm in order to utilise that firm's regulatory permissions to make introductions.

This arrangement was not aligned with FCA expectations regarding the use of regulatory permissions and created the following risks:

- Customers may be introduced to the product via entities not appropriately authorised for the activity.
- Customers may rely on perceived regulatory status (trust/authority bias), reducing their ability to assess the product appropriately.
- Risk of unclear or inconsistent communication of the product's nature and limitations.
- Potential for customers, particularly vulnerable customers, to misunderstand the level of protection or regulatory oversight.

Detail mitigating action taken [or to be taken]

- Immediate review of the IAR arrangement
- Cessation of the arrangement to ensure compliance with FCA requirements
- Appointment of Thrive as an Appointed Representative (IAR) of a Directly Authorised third party with the appropriate regulatory permissions
- Review of all distribution relationships to confirm appropriate regulatory permissions
- Clarification of permitted activities for all introducing parties
- Strengthened onboarding and due diligence processes for partners
- Updated contractual arrangements to reflect regulatory expectations
- Enhanced compliance monitoring and governance oversight
- Staff training on regulatory permissions and distribution requirements

Following mitigating action, is the product still suitable?

Yes - The product remains suitable for its target market where distribution is conducted in line with appropriate regulatory permissions.

Needs and Objectives.

Describe the needs and objectives [including financial objectives] of the target market for the product [include vulnerable customers].

The target market consists of employers and employees seeking convenient access to a range of employee benefits.

Customer needs and objectives include:

- Easy access to relevant benefits
- Cost-effective solutions
- Clear understanding of available options
- Ability to make informed decisions

For vulnerable customers:

- Simplicity and clarity of communication
- Confidence in legitimacy and safety of the product
- Additional support where required

The product is designed to meet these needs when distributed appropriately.

Product Risks.

Identify the risks posed by the complexity or nature of the product

- Customers may misunderstand the role of the platform (facilitator vs adviser)
- Reliance on third-party providers for benefit delivery
- Digital interface may not suit all users

Explain how these risks are mitigated

- Clear communication that the product does not provide regulated advice
- Transparent presentation of third-party providers
- User-friendly design and support channels

Identify the risks posed to the target market by the Product

- Misunderstanding of regulatory status of introducing parties
- Inconsistent or unclear communication due to non-standard distribution arrangements
- Reduced ability to assess product value

Explain how these risks are mitigated

- Removal or correction of non-compliant IAR arrangements
- Standardisation of distribution channels
- Enhanced oversight of communications used by distributors

Identify the risks posed to vulnerable customers by the Product

- Increased reliance on perceived regulatory protection
- Greater likelihood of misunderstanding product limitations
- Reduced ability to challenge or question the service

Explain how these risks are mitigated

- Improved clarity of communications
- Strengthened controls over who can introduce the product
- Monitoring to ensure consistent and compliant messaging

Testing.

As part of this review a structured test of the project must be undertaken, this test should sample current accounts to enable this section to be completed.

Is the product meeting the needs and objectives of its target market and vulnerable customers?

Yes, based on product design and usage data, subject to compliant distribution.

Has a value assessment been completed, and does it demonstrate good value?

Yes. A separate Price & Value Assessment confirms the product offers fair value.

Has the product been distributed in accordance with the value assessment findings?

Not fully. The identified IAR arrangement represented a deviation from intended distribution strategy and regulatory expectations.

Are communications being used as detailed within the product approval?

Generally yes; however, the identified distribution arrangement created a risk of inconsistent communication.

Does data demonstrate the communications are effective in allowing the target market to understand the key features and benefits of the product and make effective decisions?

There is no evidence of widespread misunderstanding; however, the identified issue indicates potential risk where distribution is not controlled.

Does testing demonstrate the communications are clear, fair and not misleading?

Yes, for approved channels. Additional controls have been implemented to ensure consistency across all distribution.

Are customers adequately supported after the point of sale?

Yes. Support is provided through the platform and customer service channels.

Have testing of the actions of distributors been undertaken?

Yes. The review identified the IAR arrangement as an exception requiring remediation.

Where testing identifies the product is not meeting the needs of some or all of its target market [including through identified issues with communications] has the following action been taken:

Cease distribution, Mitigate failures, Inform distribution chain.

- Mitigate failures
- Inform distribution chain

(Distribution has been reviewed and corrected; relevant parties have been informed.)

Consumer Support.

Has the product been designed to support retail customers such that it meets the needs of retail customers, including those with characteristics of vulnerability?

Yes. The platform is designed to be simple and accessible.

Is there evidence demonstrating that retail customers can use the product as reasonably anticipated?

Yes. Usage data indicates customers are able to access and engage with benefits.

Is there evidence demonstrating appropriate friction in the customer journeys to mitigate the risk of harm and give retail customers sufficient opportunity to understand and assess their options, including any risks

Yes. Customers are provided with sufficient information before engaging with benefits.

Is there evidence demonstrating retail customers do not face unreasonable barriers (including unreasonable additional costs) during the lifecycle of the product, such as when they want to:

(a) make general enquiries or requests.
(b) amend or switch the product.
(c) transfer to a new product provider.
(d) access a benefit which the product is intended to provide.
(e) submit a claim.
(f) make a complaint; or
(g) cancel a contract, agreement or arrangement or otherwise terminate their relationship

No. Customers can:

- Make enquiries
- Access benefits
- Raise complaints
- Exit the platform

without undue difficulty or cost.

Findings.

Is the product demonstrating a clear set of benefits for its target market [including vulnerable customers]

Yes. The platform provides accessible, cost-effective benefits.

Does the product provide fair value for the target market [including vulnerable customers]

Yes, subject to compliant distribution arrangements.

Have identified risks of the product been reasonably mitigated and distribution strategies designed to significantly reduce such risks?

Yes. The identified risk relating to distribution has been addressed through remediation actions.

Is the product allowing identified groups of customers to pursue their financial objectives?

Yes. Customers are able to access benefits aligned with their needs.

Have customers been able to use the full benefits of the product?

Yes. There is no evidence of systemic barriers to usage.

Is the product design avoiding foreseeable harm as set out in PRIN 2A.2.10 G?

Yes, following remediation of the identified distribution issue.

The incident highlighted a foreseeable harm relating to misuse of regulatory permissions; this has now been addressed.

Thrive by Blackfinch Ltd, Meadow Barn, Elkstone Studios, Cheltenham, GL53 9PQ.
Company no. 13734526. Thrive is not authorised to provide financial advice.

All information correct as at June 2026.