

For financial intermediary use only.

JUST.

RECOGNISING

Vulnerability

**SUPPORTING
WELLBEING**

Useful tools and information to help you identify and support customers in vulnerable situations.

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IDEAS ON HOW TO SUPPORT CUSTOMERS

VULNERABILITY	OPTIONS
Sight challenges	<ul style="list-style-type: none">• Larger font documents• Braille• Audio
Hearing challenges – partially deaf	<ul style="list-style-type: none">• Does the customer have a hearing aid?• Does it help to use a speaker phone?• Could the customer move somewhere quieter and be called back?• Would the customer prefer to communicate in writing?• Offer a Text Talk facility.• Is there a Power of Attorney (POA) in place or would they like to nominate someone to talk on their behalf?
Hearing challenges – full hearing loss	<ul style="list-style-type: none">• Is there a POA in place?• Offer a Text Talk facility?• We can verify identity by requesting additional documentation – such as a passport.
Customer unable to sign documents due to a physical disability	<ul style="list-style-type: none">• Are there any acceptable alternatives (eg stamp, digital signature etc)?• Vulnerable Customer Champion*.

VULNERABILITY	OPTIONS
Mental capacity limitations	<ul style="list-style-type: none"> • Use the BRUCE model (see page 5) to support the customer. • Ask if a POA is in place. • In situations where you lack confidence in the customer's mental capacity speak to your Vulnerable Customer Champion* and Line Manager for further options.
Mental health issues	<ul style="list-style-type: none"> • You could use IDEA (see page 6) to encourage the customer to share information about the condition and let us know how we can support them.
Mentions of suicide	<ul style="list-style-type: none"> • Use the BLAKE model (see page 8) to help you assess the level of immediate risk. • Speak to someone after the call for your own wellbeing.
Financial difficulties	<ul style="list-style-type: none"> • You could use IDEA to encourage the customer to share information about their situation and let us know how we can support them. • Can internal processes be adapted? • Signpost the customer to an organisation who may be able to help them.
English is not first language	<ul style="list-style-type: none"> • Does the customer have someone who can translate for them? • Is it easier to communicate in writing?

* For any other solutions speak to your local Vulnerable Customer Champion for guidance.

In the finalised guidance, FG21/1, the FCA suggests that 'It could be helpful to have vulnerability champions with expertise in different types of vulnerability'.

MENTAL CAPACITY TRIGGERS

Mental capacity is the ability to make independent decisions about your property, finances and health.

The following behaviours may be signs the customer is experiencing mental capacity limitations. They may need additional support to help make decisions.

A third party is prompting in the background or takes over call.

They struggle to recall or communicate basic personal information.

They become unexpectedly and highly emotional.

They struggle to understand information or explanations.

They provide conflicting information or answers.

They're unaware of their policy with us, decisions they've made or conversations they've had with us recently.

They are repeating themselves.

Their conversation appears farfetched, extreme or erratic.

Someone mentions they're moving into care or in with family.

Their signature is quite different to the one you have on file.

They tell you they have a condition – such as dementia, mental health issue or learning difficulty – which can affect capacity.

A third party - such as a relative, friend or an official - raises a concern which needs to be investigated further.

You can use the **BRUCE** model (see page 5) for suggestions on how to support someone who you think may be experiencing mental capacity limitations.

BRUCE

WHEN YOUR CUSTOMER HAS MENTAL CAPACITY LIMITATIONS

SUGGESTED WORDING

BEHAVIOURS

Consider the things a customer says or does. These may be triggers that suggest they're struggling with decision making.

REMEMBERING

"Would it be helpful if I went over that again?"
"Would it be helpful if I put that in writing?"
"Is there someone that usually helps you with your finances?"

UNDERSTANDING

"Do you want to tell me what you've understood so far and I can fill in gaps."
"Would it help if I explained that again?"
"Is there someone that usually helps you with your finances?"

COMMUNICATING

"Is there another way you'd like us to communicate with you?"
"Is there another time when it would be better to have this conversation?"
"Take your time."

EVALUATE (OR WEIGH UP OPTIONS)

"Would it be helpful to go through each option again?"
"Do you have someone you normally talk these things through with?"

IDEA

WHEN TALKING TO A CUSTOMER ABOUT
THEIR SITUATION OR HEALTH CONDITION

SUGGESTED WORDING

IMPACT

“What are you finding hard?”

“What has been the impact on your day-to-day living?”

DURATION

“When did this first start to happen?”

“How long have you been experiencing this?”

EXPERIENCE

“Is this happening often?”

“Have you experienced this before?”

“Could it happen again?”

ASSISTANCE

“Are you receiving any support / assistance / medication?”

“Have you asked about whether you’re entitled to more support / assistance / benefits?”

MENTAL CAPACITY - THE FIVE PRINCIPLES

1. Always assume capacity.
2. Provide reasonable support.
3. Accept that customers can make unwise decisions.
4. Act in the customer’s best interest.
5. Take the least restrictive option.

TEXAS

TO GAIN CONSENT TO RECORD SENSITIVE INFORMATION SHARED BY YOUR CALLER

SUGGESTED WORDING

THANK THEM

“Thank you for sharing.”

“I appreciate you telling me what’s going on for you.”

“I appreciate you sharing how you’re feeling.”

EXPLAIN HOW WE’LL USE THIS INFO

“I can make a note on our records.”

“This will mean you won’t need to keep repeating yourself.”

“It will help us support you better.”

“We can see what we can do to help.”

“This information will only be shared within our organisation.”

GAIN EXPLICIT CONSENT

“Are you happy for me to make a note of what you’ve shared today?”

ASK

“Is there anything you’d like us to do which will help?”

“Are you getting any help from anywhere – for example family?”

You can also use IDEA for additional help on asking questions.

SIGNPOST

“Some of our customers have found it helpful to speak to”

Do you have a list of external experts we can signpost to?

“Leave it with me and I’ll see what more we can do to support you”

You can then either speak to your VC champion for more information or search online.

BLAKE

SPEAKING TO SOMEONE WHO'S TALKING ABOUT TAKING THEIR OWN LIFE, OR HAVING SUICIDAL THOUGHTS

SUGGESTED WORDING

BREATHE – TO FOCUS

It can be hard to hear so take a moment and acknowledge the customer “I’m so sorry to hear how you’re feeling. How can I help?”

LISTEN ACTIVELY – TO UNDERSTAND

Always treat what the customer is saying seriously. Listen out for signs of imminent risk.

ASK – TO DISCOVER

“Where are you now?”
“Is there anyone you can call or speak to?”
“What’s happened to lead you to how you’re feeling?”
“Is there anything I can do which will help you now?”
“Have you felt like this before?”
“What have you done before which helped you when you’ve had these feelings/thoughts?”

KEEP SAFE

“I’m worried about what you’ve told me, what can I do to keep you safe?”
“It may be helpful to speak to someone who may be able to provide the right emotional help you need. Have you thought of speaking to the Samaritans? Or maybe another listening organisation?”
“Would you like me to call you back at a later time and see if you’re feeling any better?”
If you feel there is an immediate risk then keep the customer on the phone and message your Team Manager or VC champion asking them to contact the police.

END – WITH SUMMARY

“Before we finish can I ask how are you feeling now?”
“What are you going to do after this call to help you feel better?”

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CONTACT US

The Just team helps firms develop vulnerability policies that are bespoke, appropriate and effective.

Contact our dedicated team to find out more:

T: **0345 302 2287**

Calls may be monitored and recorded, and call charges may apply.

E: **support@wearejust.co.uk**

Alternatively, go to justadviser.com or scan the QR code below for more information and online support.

