

JUST.

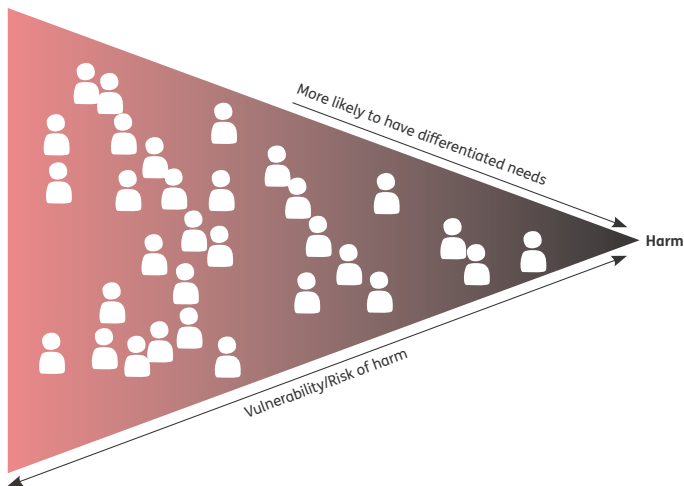
# VULNERABILITY MATTERS

Supporting wellbeing with useful tools and information  
to help clients in vulnerable circumstances.

# THE VULNERABILITY SPECTRUM

All clients are at risk of becoming vulnerable, whatever their age or financial status, but the risk is increased by having characteristics of vulnerability (see page 3).

The Financial Conduct Authority (FCA) adopted the concept of a 'spectrum of vulnerability' whereby clients can move up and down depending on their individual circumstances.



Source: FCA Finalised guidance (FG21/1)

# VULNERABILITY DRIVERS AND CHARACTERISTICS

DRIVERS	CHARACTERISTICS
HEALTH	<p><b>Examples include:</b></p> <ul style="list-style-type: none"><li>• Physical disability</li><li>• Severe or long-term illness</li><li>• Hearing or visual impairment</li><li>• Mental health condition or disability</li><li>• Addiction</li></ul>
LIFE EVENTS	<p><b>Examples include:</b></p> <ul style="list-style-type: none"><li>• Retirement</li><li>• Bereavement</li><li>• Income shock</li><li>• Relationship breakdown</li><li>• Domestic abuse (including economic control)</li></ul>
RESILIENCE	<p><b>Examples include:</b></p> <ul style="list-style-type: none"><li>• Insufficient or erratic income</li><li>• Over-indebtedness</li><li>• Low savings</li><li>• Low emotional resilience</li></ul>
CAPABILITY	<p><b>Examples include:</b></p> <ul style="list-style-type: none"><li>• Low knowledge or confidence in managing finances</li><li>• Low literacy or numeracy skills</li><li>• Low or non-existent digital skills</li><li>• Learning difficulties</li><li>• No or low access to help or support</li></ul>

# SPOTTING THE SIGNS

WHAT MIGHT I NOTICE?	HOW DO I SUPPORT MY CLIENT?
<b>My client has a visual impairment</b>	<ul style="list-style-type: none"><li>• Larger font documents</li><li>• Braille</li><li>• Audio</li><li>• Explore using accessibility tools e.g. screen readers and Recite Me</li><li>• Alexa and Google Assistant</li></ul>
<b>My client has a hearing impairment</b>	<ul style="list-style-type: none"><li>• Does the client have a hearing aid?</li><li>• Does it help to use a speaker phone?</li><li>• Could the client move somewhere quieter and be called back?</li><li>• Would the client prefer to communicate in writing?</li><li>• Offer a text talk option</li><li>• Is there a Power of Attorney (POA) in place or would they like to nominate someone to talk on their behalf?</li></ul>
<b>My client has full hearing loss</b>	<ul style="list-style-type: none"><li>• Is there a POA in place?</li><li>• Offer a text talk option</li><li>• Option for a video call with subtitles, along with making use of captions</li></ul>
<b>My client is unable to sign documents due to a physical disability</b>	<ul style="list-style-type: none"><li>• Offer other acceptable alternatives (eg stamp, digital signature etc)</li></ul>

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'.

# SPOTTING THE SIGNS (CONTINUED)

WHAT MIGHT I NOTICE?	HOW DO I SUPPORT MY CLIENT?
<b>My client is struggling to understand and make decisions</b>	<ul style="list-style-type: none"> <li>• Use the BRUCE model (see page 8) to support the client</li> <li>• Ask if a POA or trusted party is in place</li> </ul>
<b>My client seems low or is erratic</b>	<ul style="list-style-type: none"> <li>• Consider using IDEA (see page 6) to encourage the client to share information and how you could support their needs</li> </ul>
<b>My client is sharing suicidal thoughts or ideation</b>	<ul style="list-style-type: none"> <li>• Use the BLAKE model (see page 9) to help you assess the level of immediate risk</li> <li>• Speak to someone after the call for your own wellbeing</li> <li>• Use appropriate signposting or safeguarding options</li> </ul>
<b>My client is reducing their outgoings and struggling to pay bills</b>	<ul style="list-style-type: none"> <li>• Using IDEA will encourage your client to share information about their situation and how you might support them</li> <li>• Signposting your client to an organisation who may be able to help them</li> </ul>
<b>My client is struggling with the English language</b>	<ul style="list-style-type: none"> <li>• Does your client have someone who could translate for them?</li> <li>• Would it be easier to communicate in writing?</li> </ul>

Models BRUCE, IDEA, BLAKE and TEXAS: Developed by Chris Fitch, Colin Trend, and the Money Advice Trust.

# IDEA

## WHEN TALKING TO A CLIENT ABOUT THEIR SITUATION OR HEALTH CONDITION

### 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 enquired about whether you’re entitled to more support / assistance / benefits?”

# TEXAS

WHEN YOUR CLIENT  
SHARES SENSITIVE  
INFORMATION, GAIN  
EXPLICIT CONSENT  
TO RECORD IT

## THANK THEM

“Thank you for sharing.”

“I appreciate you telling me what’s happening with you.”

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

## EXPLAIN HOW YOU’LL USE THIS INFO

“Are you happy for me to make a note on our records?”

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

“It’ll help us support you better.”

“We can check 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 could 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 clients have found it helpful to speak to .....”

**(Does your organisation have a list of external experts you can signpost to?)**

# BRUCE

IF YOUR CLIENT  
IS STRUGGLING TO  
MAKE DECISIONS

## BEHAVIOURS

Consider the things a client 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

"Would you like 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?"



# BLAKE

## IF YOUR CLIENT IS SHARING SUICIDAL THOUGHTS

### BREATHE – TO FOCUS

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

### LISTEN ACTIVELY – TO UNDERSTAND

Always treat what the client 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 to 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 concerned about what you’ve told me, what can I do to keep you safe?”  
“It may be helpful to speak to someone who might be able to provide the right emotional support 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 client on the phone and message your manager or a colleague 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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## FOR MORE INFORMATION

We help firms develop vulnerability policies that are bespoke, appropriate and effective.

Scan below for more information on our vulnerability resources:



Call our dedicated team to find out more:

T: 0345 302 2287

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

E: [vulnerabilitysupport@wearejust.co.uk](mailto:vulnerabilitysupport@wearejust.co.uk)

Alternatively, go to [justadviser.com](https://justadviser.com) for more information and online support.

**FT** ADVISER

