



Guidance Note: Supporting Vulnerable Customers

This Guide is to help your business set up processes to ensure vulnerable customers receive the support and assistance they need tailored to their individual circumstances. It sets out the actions and behaviours we expect from traders in our scheme.

What is a vulnerable customer?

A vulnerable customer can be described as:

'An individual who, due to their personal circumstances and characteristics, is significantly more likely than an average person to be at risk of harm; particularly in connection with how a firm deals with them, or where the nature of their vulnerability is likely to result in a more substantial risk of harm.'

Vulnerability Factors

Vulnerability can be caused by a number of linked factors that can create a vulnerable situation, such as:

- **Individual factors:** health condition, their emotional state, or communication difficulties
- **Wider circumstances:** life events, sudden household or social changes
- **Organisational actions** (or lack of): how an organisation treats its customers and the actions it takes or fails to take.

Stages of Vulnerability

Vulnerability comes in many forms. These are often not visible and can be acquired, temporary, situational or permanent. Many people in vulnerable circumstances would not regard themselves as 'vulnerable', and two people experiencing the same issue or event might interpret their degree of vulnerability differently.

Vulnerability Characteristics

For the purposes of this guide an individual may be potentially vulnerable or vulnerable if they (or their appointed representative) disclose or indirectly mention one, or more of the following circumstances or characteristics (but not limited to):-



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Mental Capacity or Mental Health Impairment	Physical Impairment	Life Event
Cognitive incapacity (e.g. Dementia, brain damage)	Sensory loss or impairment (e.g sight, hearing)	Redundancy
Psychosis, anxiety, stress, depression, dissociative identity disorder (DID)	Physical disability	Bereavement
Addiction (e.g drugs, gambling, alcohol)	Life limiting condition (e.g. cancer, motor neurone disease)	Fraud/scam victim Intimidation
Learning & communication difficulties (e.g. dyslexia, autism)	Mobility/dexterity	Age-related issues
Poor literacy/numeracy	Speech loss or disorder	Debt/bankruptcy
Low financial understanding	Temporary ill-health/accident/injury	Divorce/separation

Note:- It is important not to place an assumption on a customer that they are vulnerable. For example not all elderly or disabled people are vulnerable.

Reasonable Adjustments

Consideration will need to be given to any reasonable adjustments that certain individuals may need due to their vulnerable characteristics; taking into account mental capacity and equality legislation. Such adjustments can include (but not limited to):

- The need for material to be translated into a different language, and or braille.
- Using their preferred way of communication - by email, telephone (time of a call morning/afternoon). Speaking to a friend, family member or appointed attorney, if asked to do so.
- Increased text size, and or alternate fonts, and colours used.
- Providing information in a format that is easier for them to read



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- Allowing them additional time to consider any advice provided by your customer facing teams.
- Assigning a single point of contact to manage a consumer's interaction (communication) with you, if appropriate
- Offering possible alternate solutions based on our current capabilities, if the consumer is unable to use your online service or alternative payment solutions.
- Offering early morning appointments or appointments at a given time slot.

What do we expect from our Which? Trusted Traders?

Dealing with vulnerable consumers applies to current and prospective customers. It involves being able to identify a vulnerable customer and having processes in place to protect them from any potential harm caused by business practices.

Understanding your customer base will help you to identify and make adjustments for those customers with vulnerability issues. Some businesses will interact more with vulnerable customers than others depending on the industry, for example the mobility or removals sector. It is important to note that businesses can exacerbate the effects of vulnerability or create barriers for customers through poor practices.

As a Which? Trusted Trader we expect the following from your business:-

1. Ensure customer facing staff are trained on how to spot a vulnerable consumer and how to deal with that customer appropriately.
2. Ensure customer facing staff are trained on how to comply with data protection legislation regarding sensitive personal data. The customer's freely given consent must be obtained to record and use information about their vulnerable circumstances.
3. Ensure that policies and/or procedures are in place for the identification of vulnerable customers and how to protect them from any potential harm.
4. Appoint a person or group of people in your business to take responsibility for vulnerable customer issues as a whole and deal with any staff queries.