VULNERABLE PERSON'S POLICY

AIM OF THIS POLICY
The aim of this policy is to outline the practice and procedures to enable us to assist clients better who feel they may be in vulnerable circumstances.

The information below has been set out for us as a guide by the Financial Conduct Authority, we felt it would be clearer for us the share their views for all our customers and prospective customers.

DEFINITION OF VULNERABILITY
The Financial Conduct Authority (FCA) has developed the following definition to guide work in this area:

"A vulnerable consumer to be someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when a firm is not acting with appropriate levels of care."

Vulnerability occurs in a variety of ways which may be permanent, temporary, or even sporadic, dependent on its nature. In many circumstances the individual may not recognise themselves as 'vulnerable'.

We recognise that vulnerability may not be simply due to the situation of the consumer but caused or aggravated by the actions or processes of the firms they may deal with.

We recognise that clients who might be considered as being in vulnerable circumstances could include clients with:

1. mental capacity deficiencies (including language or communication), including mental illness and dementia.
2. stress or subject to financial shock of all types, such as employment concerns, bereavement (or potential bereavement), marital or relationship difficulties.
3. a physical impairment that may not allow them to engage with automated, or other standard process requirements (such as photographic ID, phone keypad recognition, or internet applications);
4. severe and long-term illness (both life-limiting and where recovery is expected);
5. little or no financial experience or have no access to mainstream financial services.
6. low income.
7. an existing distressed financial situation.
8. responsibilities for others, such as 'carers' or acting as power of attorney.
9. no access to the internet or other digital media.
10. poor language skills.
11. a general vulnerability due to being aged 75 and over or aged 18 years and under

As a firm we must remain mindful of the potential for enquiry by these clients and the potential for any change of circumstance in respect of existing customers.

IDENTIFICATION OF CLIENTS IN VULNERABLE CIRCUMSTANCES
Vulnerability is broad and may occur at any time. It will usually involve the interplay of characteristics of the individual, their circumstances, and static or transitory status.

We only deal with customers in vulnerable circumstances where we are aware of their needs:

1. mental capacity deficiencies – the FCA provides clear guidance on the identification of mental capacity limitation issues in their Handbook.
2. stress or financial shock – may be identifiable (facial expression, posture or stance etc.), but otherwise may be revealed through conversation before and during interview
3. physical impairment – may be identified visually, or through interview
4. severe and long-term illness – may be identifiable through conversation or through interview
5. financial inexperience – may be identified through the fact find process and their credit profile
6. low income – may be identified through interview and credit profile
7. in financial distress – may be identified through interview and credit profile
8. carers – may be identified through interview or conversation
9. digital exclusion – identifiable through interview or via routes of engagement (or non-engagement) with the firm
10. poor language skills – may be audible or identifiable via routes of engagement with firm
11. clients aged 75 and over or clients aged 18 years and under – should be offered the opportunity to have a relative or friend accompany the client to a meeting

The nature of the need area to be addressed may also indicate vulnerability. For example, people wanting to arrange:

- An equity release product
- Right-to-buy
- A first-time buyer mortgage
- Debt consolidation or further credit
- Debt management
- The provision of long-term care
- Excessive monetary withdrawals from investments