

Vulnerable Customers

Protecting vulnerable customers has never been more important. The current cost of living crisis has resulted in people unexpectedly falling into the vulnerability category.

The Financial Conduct Authority (FCA) requires all financial service organisations to recognise and understand the importance of vulnerable customers experiencing outcomes as good as other consumers and to receive consistently fair treatment.

Who is a vulnerable customer?

The FCA has defined a vulnerable customer as:

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

The Society has defined a vulnerable customer as:

Vulnerability is when a customer's personal circumstances and characteristics result in situations where they are:

- *More likely than a typical customer to suffer harm, or that harm is likely to be more substantial and/or*
- *Less able than a typical customer to protect or represent their interests.*

Examples of vulnerability

Anyone can find themselves in vulnerable circumstances at any time. Examples of vulnerability are:

- Health – illnesses or conditions which make it difficult to carry out daily tasks.
- Life events – such as bereavement, job loss or relationship breakdown.
- Resilience – low ability to withstand financial or emotional shocks, e.g. over-indebtedness
- Capability – such as lack of knowledge in financial matters, poor literacy, numeracy, or IT skills

Supporting a vulnerable customer

The Society is taking action to understand and respond to vulnerable customers' needs – from identification, treatment, and products.

Supporting those in vulnerable circumstances begins with training our staff to equip them with the skills they need. All our Society staff have taken training on what a vulnerability is and how they should be identified and handled. Additionally, every branch will have a specialist team member.

The Society is also a JAM card organisation, partnering with NOW Group. Being JAM card friendly ensures that people know they can ask for Just A Minute of patience and understanding when they talk to us.

The Society is committed to:

- The fair and appropriate treatment of all our customers, who the Society understands or reasonably suspects to be particularly vulnerable.

- Providing support to our more vulnerable customers – this is central to the Society's commitment to treat customers fairly.

The Society's aim is, so far as is reasonably practicable, to:

- Provide awareness training to all our staff regardless of role.
- Develop practical and consistent guidance for staff so we can better support our vulnerable customers.
- Understand the impact of vulnerability and how it changes customers needs.
- Practically consider how processes and services can help our vulnerable customers
- Where necessary and practical, (without breaching legal or regulatory requirements) adapt the environment, policies or procedures to accommodate our vulnerable customers' needs and circumstances.
- Treat all our vulnerable customers in a fair, considerate and respectful manner.
- Where appropriate, to positively signpost our vulnerable customers to experts/services that will be better placed to support and assist them.