

Providing A Helping Hand

We are committed to helping vulnerable customers and supporting those who need a little extra help.

Understanding vulnerability

Vulnerability can present in a number of ways and in varying degrees. For example, when someone's personal circumstances may result in them being confused, perhaps less able to understand things and make decisions. This can lead to an increased risk of harm, or a bad outcome, which is why we are here to help. Vulnerability isn't always permanent, it may be temporary, depending on the circumstances of each individual.

We accept that a customer's welfare could be put at risk through choosing an in appropriate or unsuitable product from us. We need to ensure that no customer would be put at detriment from taking any policy from us and as such, will provide additional help and support based on individual circumstances.

We will always to our best to identify a customer who may be vulnerable and need extra help, but it's not always easy for us to do. If you feel that you may be vulnerable, we encourage you to speak to us in confidence so we can fully understand your position and tailor a package of support that is best for you.

We have identified certain risk factors which may tend towards vulnerability:

- Age
- Mental health issues
- Cultural / language barriers
- Bereavement
- Health problems
- Being a carer
- Loss of income
- Relationship breakdown
- Learning disabilities
- Physical disabilities
- English as a second language
- Low literacy
- Living in a 'high risk' area
- Lack of internet access
- Inexperience

We recognise that while these factors indicate a possibility of vulnerability, they won't always result in a customer needing to be treated as vulnerable.

Being 'vulnerable' will mean different things to different people. If you are unsure if you would be considered vulnerable, we have given some information, which may help you.

Mental Capacity

Your mental capacity is your ability to make decisions. This includes having the ability to understand, remember and give due consideration to relevant information and can affect whether you are able to make an informed decision based on that information we provide and how you are able to communicate your decision to us.



It is very important to us that you understand the information we are providing you, including about the policy/products we are providing you with. So, we are always happy to explain things as many times as you need to feel comfortable about making a decision to buy a policy with us.

Understanding Money

You may not have a strong understanding of money and finances. This could result in you feeling less empowered when managing your finances, which may result in you not making the best decision about how you spend your money.

We will always ensure that we are providing you with the right product, at a fair price. We will, where appropriate, and in your best interest, offer you the chance to spread your payments. We hope this will give you confidence to engage with us.

Signs of Vulnerability

When we speak with you, we would consider the following as signs indicating vulnerability:

- Difficulty or an inability to hear or understand what we are saying to you
- If you repeat questions or statements
- If your comments, or answers to our questions are not consistent with the discussion as this indicates that you may not be understanding what we are saying
- If you appear to be struggling to make relatively straightforward decisions
- If you have someone else with you during the call that is prompting you or assisting you during the conversation

Even as a vulnerable customer, you may be very able to deal with your financial arrangements and obtaining financial services without the need for special arrangements; however, we aim to ensure that where this is not the case, we can work with you and providing you with appropriate help and support, ensuring you get a good outcome and are able to achieve your financial objectives.

How We Will Support You

When we engage with you, we listen carefully and take into account your personal characteristics and circumstances.

We have sought to ensure that each one of our customers can be confident that at all times, we are working in their best interests to ensure they have:

- access to appropriate products which are clear, transparent and easy to understand
- a choice in how they wish to communicate with us
- individual attention and a personalised service which avoids stock responses and “computer says no” responses
- a tailored response which is flexible enough to be able to respond quickly in the event of a sudden change in their circumstances
- the attention of someone who will take the time to listen, who is empathetic and responsive enough to let the conversation take its natural course, and who is sufficiently trained to spot signs of vulnerability and refer on to a more experienced colleague where necessary
- access to someone who has the authority and discretion to take a tailored approach to the situation if necessary
- the knowledge that information disclosed about their personal circumstances will be treated in confidence by the firm and recorded so that it does not have to be repeated



We aim to give you the individual approach you need while maintaining consistency with our service standards and assist when a person has a power of attorney or other authority to act on your behalf.

You may require the assistance of third parties, such as carers, family members, advocates and other representatives. We work with such third parties to assist you, but will at all times, maintain the necessary level of customer confidentiality.

Where appropriate, we may suggest to you that you contact support agencies that may be able to provide relevant assistance.

Treating vulnerable consumers fairly

We strive to always respond to customer vulnerability in a way which is sensitive and responsible, while providing products and services which meets their demands and needs.

If we suspect that we are dealing with a vulnerable consumer we make a record of this and proceed in accordance with this policy.

Should we consider a customer to be a vulnerable consumer we:

- give the customer ample opportunity to ask questions about the information we are providing
- seek to verification from them that they have understood the information we are providing
- where appropriate, ask if they have anyone available able to assist them and work with them
- if appropriate, we make it possible for them to speak to a senior colleague or a member of staff with more relevant experience
- offer them the chance to complete the transaction after a further period of time
- do not proceed with the transaction if it is clear that the customer does not understand the product or service being offered or is unable to make an informed decision
- offer to provide the customer with additional details (in writing where appropriate) to enable them to consider the product or service in their own time

Debt recovery

If you are experiencing financial hardship may find yourself in a position of being unable to pay your premiums or instalments. As such, we would consider you to be vulnerable by virtue of your financial circumstances.

We would always encourage you to talk to us if you are experiencing financial hardship so that we can support you in a way which avoids you falling into debt with us.

We offer a premium credit facility via third party providers, so your instalments are paid to them. If you cannot pay an instalment, you should contact them in the first instance and explain your situation to them. They will try to support you as far as they can.

If you fail to do this and your payments default, the credit agreement will be cancelled, which may adversely affect your credit score. We would therefore urge you to keep communicating with them so they can help you are far as they are able to.

In the event that the credit agreement is cancelled, the debt attaching to the credit agreement passes from the third party premium finance provider to us. If this happens, we will work with you to put in place a

payment plan, allowing you to spread the outstanding amount, and avoid your policy from being cancelled, leaving you without cover.

Should you feel it appropriate or necessary, you can refer a vulnerable customer to the following agencies/counselling services:

DMA Guidelines for call centres dealing with vulnerable customers: http://dma.org.uk/uploads/call-centres-vulnerable-consumers_final_53d7c237289c1.pdf

Mental capacity guidance – FCA Handbook: <http://fshandbook.info/FS/html/FCA/CONC/2/10>

FCA Paper – Consumer vulnerability & practitioner pack:

<http://www.fca.org.uk/static/documents/occasional-papers/occasional-paper-8.pdf>

Money Advice Liaison Group’s “Good Practice Awareness Guidelines for Consumers with Mental Health Problems and Debt:

[http://www.malg.org.uk/dmhddocuments/Mental%20Health%20Guidelines%20Ed%202%20Final%202009.p](http://www.malg.org.uk/dmhddocuments/Mental%20Health%20Guidelines%20Ed%202%20Final%202009.pdf)
[df](http://www.malg.org.uk/dmhddocuments/Mental%20Health%20Guidelines%20Ed%202%20Final%202009.pdf)

Support agencies (check locally for others)

Money Advice Service: www.moneyadviceservice.org.uk or phone 0300 500 5000

AdviceUK - Member centres offer debt advice including specialist advice for minority communities and people with disabilities: www.adviceuk.org.uk or phone or phone 0300 777 0107

Citizens Advice - For advice and information on debt and other topics: local Citizens Advice Bureau (address in the phone book) or go to www.adviceguide.org.uk

Age UK: www.ageuk.org.uk or phone 0800 169 6565

National Debtline for England, Wales and Scotland: www.nationaldebtline.org or phone 0808 808 4000