

The following diagram from the FCA demonstrates the level of vulnerability in the UK

The Financial Conduct Authority (FCA) defines vulnerable customers as the following:

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

How can a customer be vulnerable?

Vulnerability can come in a range of guises and can be temporary, sporadic or permanent in nature. It is a fluid state that needs a flexible, tailored response from firms.

The following are examples of how customers can be vulnerable:

1. Mental health problems i.e. depression or anxiety
2. Difficult financial circumstances i.e. recent unemployment
3. Physical health problems i.e. disability or long-term illnesses
4. Communication skills i.e. an individual who has limited English

How can businesses assist vulnerable customers?

Consistency

Firms should have effective policies and procedures in place to ensure a consistent approach across operations.

Clear Information

Providing clear information to customers before and after sale ensures that vulnerable customers are more likely to make informed decisions.

Staff Training

Providing staff with sufficient training to enable vulnerable customers to be identified and have their sensitive issues handled appropriately.

Empowering Staff

Referring vulnerable customers to staff who have the authority and discretion to take a tailored approach to a customer's circumstances.

Flexibility in Service

Treating customers as individuals and considering how our service can be adapted to meet their specific circumstances Being Pro-Active Pro-actively contacting customers and offering a tailored service to meet their specific circumstances.

Specialist Advice

Referring customers to organizations that can offer specialist advice to assist a customer with their vulnerability.

What guidance is available?

SM Cars Norwich Ltd believes that to deliver a truly ethical approach in delivering a service that is extremely sensitive the commitment has to permeate throughout all activity as the business as a whole. We believe that the adoption and application of the right policies, standards and approaches will deliver an ethical approach in a practical and measurable way. SM Cars Norwich Ltd also gives full consideration to any mitigating or vulnerable conditions, and seeks the advice and approval of our clients before proceeding with any action in the following circumstances:

- Serious illness/long-term sickness
- Ethnic minorities who cannot understand or speak English
- Pregnancy or recent birth of a child
- Recent bereavement
- Recent unemployment
- Severe financial difficulties
- Any other guidelines stipulated by our client

SM Cars Norwich Ltd process for identifying vulnerable claimants is set out in 3 stages:

1. Prior to us receiving a case
2. Once we have received a case
3. Whilst making first contact with the client

All staff is trained, display a positive attitude and are considerate to customers in financial difficulties, responding sympathetically to their difficulties and encouraging them to obtain guidance from relevant advisory organisations. Through regular dialogue with customers and advisory bodies, we will ensure that staff are kept up to date with any changes in our collection/sign-up policy and carry the most up-to-date contact details for advisory groups within the client's area.

In accordance with legislation and best practice, SM Cars Norwich Ltd will establish and maintain effective quality assurance systems for monitoring and reporting Adult safeguarding issues and will share all adult protection information across agencies.

Please note that this table is not indicative of all vulnerable customer considerations. SM Cars Norwich Ltd is unable to offer businesses advice, the FCA and the British Bankers' Association provide guidance about how to identify and respond to vulnerable customers. This can be found at • www.fca.org.uk/consumer-vulnerability • www.bba.org.uk/publication/bba-reports/improving-outcomes-for-customers-in-vulnerablecircumstances

There are also a number of organizations that can provide specialist assistance to customers; here are some that may be considered: • www.moneyadviceservice.org.uk • www.citizensadvice.org.uk • www.samaritans.org