



**TAMWORTH COOPERATIVE VULNERABLE CONSUMER POLICY – September 2020**

**Introduction**

Any person can suffer from vulnerability. This may be a short-isolated period of time or long term and even Permanent. A vulnerability can be identified as a result of either health issues or the impact of life events. These can take the form of both physical and mental health vulnerability.

It is our responsibility to do our best to identify clients and potential clients who may be vulnerable, understand and offering additional support when needed.

<b>The four key drivers of vulnerability</b>			
<i>Health</i>	<i>Life events</i>	<i>Resilience</i>	<i>Capability</i>
Physical disability	Caring responsibilities	Low or erratic income	Low knowledge or confidence in handling financial matters
Severe or long-term illness	Bereavement	Over indebtedness	Poor literacy or numeracy skills
Hearing or visual impairments	Income shock	Low savings	Low English language skills
Poor mental health	Relationship breakdown	Low emotional resilience	Poor or non-existent digital skills
Low mental capacity or cognitive disabilities	Having non-standard requirements such as ex-offenders, care leavers, refugees	Lack of support structure	Learning impairments

Source FCA

## Identifying vulnerable people

To help us identify those who may be vulnerable and in need of additional support we would use key triggers such as those recognised by the **BRUCE** protocol. Whenever engaged with a client or potential client Remembering vulnerability can be displayed some of the time or all of the time, dependant on circumstances.

**Behaviour** - is the client's behaviour and/or speech indicating a difficulty in remembering or understanding?

**Remembering** - Does the client have a problem with memory or recall?

**Understanding** - Can the client understand the information given to them?

**Communication** - Are they able to communicate their thoughts, questions and decisions?

**Evaluation** - can the client 'weigh up' the different options?

Source Money Advice Trust

## Policy Statement.

Our aim is to treat every potential, new and existing customer as individuals evaluating their personal circumstances and assess the level of their vulnerability. Support and guide their decision making to allow them to make the best decision which suits their personal needs.

- Any person identified as vulnerable will be treated with respect and confidentiality.
- We will ensure all colleagues are aware of our "Vulnerable Consumer Policy" allowing them to act accordingly in the best interests of the customer.
- Any information known to us will disclosed to other members of the company on a need to know basis and not disclosed to any external entities.
- 

Vulnerability	Risk	Mitigation
Language	Client cannot fully understand important details and information provided by Tamworth Cooperative Funeral Service putting them at a disadvantage	<ul style="list-style-type: none"><li>• Client should nominate a suitable and competent person to act as interpreter.</li><li>• Client should suggest a suitable medium of communication that they are comfortable with.</li></ul>
Mental incapacity – Short Term. (intoxication,	<ul style="list-style-type: none"><li>• Client cannot fully understand important details and information</li></ul>	<ul style="list-style-type: none"><li>• Client should be encouraged to seek independent advice. E.G.</li></ul>

intermittent mental incapacity)	<p>provided by Tamworth Cooperative Funeral Service putting them at a disadvantage.</p> <ul style="list-style-type: none"> <li>• Potential reckless disregard of guidance</li> </ul>	Family friend or professional.
Mental incapacity – Permanent.	<ul style="list-style-type: none"> <li>• Client cannot fully understand important details and information provided by Tamworth Cooperative Funeral Service putting them at a disadvantage.</li> </ul> <p>Potential reckless disregard of guidance</p>	<ul style="list-style-type: none"> <li>• Client should be encouraged to seek independent advice. E.G. Family friend or professional.</li> <li>• Client must provide power of attorney for a competent individual to act on their behalf</li> </ul>
Sight and Hearing	<ul style="list-style-type: none"> <li>• Client disadvantaged by not understanding terms and conditions of any contractual obligations.</li> <li>• Client unable to confirm instructions and mutual agreement to those instructions.</li> </ul>	<ul style="list-style-type: none"> <li>• Provide client additional time to assess information provided to them.</li> <li>• Client should nominate a suitable and competent person to act on their behalf.</li> </ul>
Physical disability Temporary or permanent.	<ul style="list-style-type: none"> <li>• Clients access to any company premises may be hindered, allowing them to accommodate a meeting for business to take place.</li> </ul>	<ul style="list-style-type: none"> <li>• Offer reasonable adjustments to premises allowing better access.</li> <li>• Suggest alternative mediums of communication. E.G Telephone or email.</li> <li>• Suggest alternative location more suitable to the client.</li> </ul>