

## WHAT IS A VULNERABLE CUSTOMER?

The Financial Conduct Authority (FCA) defines a vulnerable customer as “someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when a firm is not acting with appropriate levels of care.”

The FCA expects firms like Denman to treat customers fairly when we are dealing with people with vulnerable circumstances.

## IDENTIFYING A VULNERABLE CUSTOMER

Our staff are trained to identify vulnerable customers so we can take extra steps to assist outside of our standard procedures. However, it is not always possible to recognise these characteristics. Therefore, if you believe you may fit the criteria for a vulnerable customer, please let us know of your particular needs.

## VULNERABLE GROUPS

We recognise that certain groups of customers may be vulnerable. Whilst not all customers in these groups may be vulnerable, we will consider a customer’s individual circumstances where a potential vulnerability is identified. These groups may include, but are not restricted to:

- Customers with communication difficulties (including learning difficulties and English not being their first language, dyslexia)
- A customer with a reduction in physical or mental capacity
- Customer with health issues – illness, whether physical or mental illness, severe or long term
- A sudden diagnosis of serious illness to the customer or close family member
- Personal circumstances of the customer – factors such as financial difficulties, bereavement, caring responsibilities or redundancy
- The customers age particularly older and younger people. For example, a younger person may be considered inexperienced and the older person may be less technologically able

Our policy when dealing with a vulnerable customer:

As soon as we think we may be engaging with a vulnerable customer, whether this is through our identification or you notifying us, we will:

- Make a record of this and deal sensitively with your needs
- Provide additional opportunities for you to ask questions about the information we have provided
- Continuously seek confirmation that you have understood the information that has been provided
  - If there is difficulty in communicating, then we will discuss options with you to assess the best method of doing so, perhaps all via email or via a third party if English is not your first language
- Ask if there is anybody with you who is able to assist. If not, and we believe this will be beneficial, we will discuss the matter further with your insurers to see if we make arrangements to continue with the claim at another time

If a customer is identified as vulnerable then we will ensure we provide sufficient information to our staff to ensure they can offer the best possible assistance to that customer, but we will not provide any information we have obtained that we do not feel will be beneficial to the personnel involved

As a claim progressed and is ultimately completed, we will continue to liaise with the customer to ensure we are suitably managing their claim to meet their expectations and we will share lessons learned from such claims (anonymously) in our team feedback meetings to improve our procedures moving forward

If we can't help a customer, we will try and make sure that they understand what alternative options are available to them and do our best to provide an appropriate outcome to your claim



Mark Denman (Managing Director) – Reviewed - March 2021  
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Classification: Limited



## THE TEXAS MODEL

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**T – Thank** the customer for telling you about the situation



**E – Explain** how the information will be used



**X – gain eXplicit consent** to record the support need or needs



**A – Ask** questions to clarify the information provided, when necessary



**S – Signpost** the customer to what will happen next and where to go for further support

Confidential

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