



Care and Well-being Through Chronic Health

Supporting Vulnerable Members

The policy refers to definitions from the Financial Conduct Authority (FCA). You can find these definitions in the FCA's Consumer Credit Sourcebook.

What is vulnerability?

Vulnerability cannot be defined with a one-size-fits-all statement. It will not always be clear straight away which of our members are vulnerable. But it is important that as an organisation we have an awareness of the potential of all of our members to be vulnerable. The following factors could be helpful in determining if a client is vulnerable:

- Individual factors
- Wider circumstances
- Creditor or adviser action or inaction

The Financial Conduct Authority (FCA) has defined a vulnerable consumer 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.” ([Financial Conduct Authority \(2015\) Occasional Paper No. 8 Consumer Vulnerability: Executive summary](#)).

Our approach to identifying and supporting vulnerable members

As an organisation we will:

- Ensure that we remain aware of the potential for our members to be vulnerable
- Encourage members to feel comfortable disclosing any vulnerabilities to us
- Understand that we may need to make adjustments to our standard processes to allow vulnerable members to request and access our services
- Take vulnerabilities into consideration in how we then provide our service to vulnerable members

Common areas of concern

Mental capacity

The FCA defines mental capacity as “The ability to make an informed decision at a specific point in time. Members with mental capacity to make a decision can understand, remember and weigh up information which is presented to them, and communicate their decision.” (CONC 2.10.3G)



Care and Well-being Through Chronic Health

Mental capacity limitation is explained by the FCA in the following way: “people with a mental capacity limitation are **unable** to understand, remember or weigh up informed information presented to them, or to communicate a decision.” (CONC 2.10.8.G)

It is important not to presume that all members with mental health issues also have a mental capacity limitation. Mental capacity is not the same as mental health. Some members with mental health difficulties may have mental capacity limitations, but some will not.

Mental capacity limitations can also fluctuate. For example a person with dementia may find that they have capacity in the mornings, but struggle to understand and retain information as the day progresses. In this instance we would accommodate the client by offering advice and appointments in the mornings.

- We will encourage members to feel comfortable disclosing any potential mental capacity limitations
- We will not solely rely on members to tell us, but will also look for indicators that a client may be lacking mental capacity
- Where we identify that a client lacks mental capacity we will take reasonable steps to establish this, document it and assist the client to make an informed decision

Disclosures of sensitive personal data

Members in vulnerable situations will often disclose personal data. We have adopted a data protection policy. We will ensure that all trustees are aware of the importance of following this policy. You can read our data protection policy in the office manual. A hard copy of the office manual is available in Haverfordwest (CO’s office) and in Pembroke Dock (Advisers’ office). Alternatively you can find an electronic version of the office manual on both Haverfordwest and Pembroke Dock servers (Useful Stuff folder).

Members who talk about taking their own life

There may be occasions when and volunteers suspect or are told by vulnerable members that they are considering taking their own lives. We recognise that these situations may be a rarity, but that it is important that trustees and volunteers are clear on what action to take.



Care and Well-being Through Chronic Health

We will ensure that trustees and volunteers are aware of the importance of the following steps:

- Listening to the client, acknowledging their circumstances and feelings and making it clear we are taking them seriously
- Understanding our safeguarding policies which explain the circumstances around breaching client confidentiality and calling 999 in an emergency. You can read our policies for safeguarding adults and children. You can read the policy on the website. Please contact us if you require a hard copy. We will ensure that trustees and volunteers are able to seek support following these challenging situations.

Members with a terminal, life-threatening or long-term condition

We recognise that being told a client is suffering from a serious illness or condition can be difficult to hear. Trustees and volunteers may be concerned about how to respond and the best way to support members in these circumstances.

We will ensure that our trustees and volunteers are aware of the following ways to help in these situations:

- Provide the client with support and guidance relevant to their situation, recognising that there are likely to be areas of the client's illness or condition in which they are not experts. Trustees and volunteers will be aware of their own boundaries and ensure these are communicated to the client
- Acknowledge the disclosure of a serious condition in an appropriate and sympathetic way. Ask the client if they mind talking about the situation, and if it is not an illness or condition they have an awareness of, tell the client this and ask for more information
- Be aware of the importance of listening to a client who has disclosed a serious illness or condition and taking on board what the client feels they need support with rather than presuming
- Demonstrate empathy, but avoid the use of phrases such as “I know how you feel”
- Be aware that members in these situations may have a range of emotions including confusion, anger, distress, fear, depression and sadness

We will ensure that trustees and volunteers are aware of the importance of looking after their own wellbeing and that they can seek support from their line managers whenever needed.



Care and Well-being Through Chronic Health

When someone else gives us information about a client

In some situations we may receive advice from a carer or family member about a vulnerable client.

We will ensure that our trustees and volunteers understand that whilst they should not discuss a client's case with anyone who does not hold the appropriate authority, this does not mean they cannot listen to the information being provided by a third party.

We recognise that disclosures from carers can be valuable. We are committed to engaging with carers and taking appropriate action, whilst ensuring that we maintain client confidentiality.

Our confidentiality policy has more detail about this. We will ensure that all trustees and volunteers are aware of the policy. You can read our confidentiality policy on our website. If you require a hard copy, please contact us.

Supporting and training trustees and volunteers

We will make steps to ensure that all trustees and volunteers receive appropriate training, to allow them the knowledge to effectively identify and support vulnerable members.

We recognise that trustees and volunteers may require extra advice, support and guidance when working with vulnerable members. This support is available from the trustees in the first instance.

Review of policy

This policy will be reviewed annually. If the law changes before the policy is due for review, we will update the policy as needed.

Date adopted by Trustees: 26.06.18

Dates policy annually reviewed: