Looking out for vulnerable customers

A guide to identifying and understanding vulnerable customers.
Understanding vulnerability

Santander for Intermediaries want to help all customers secure the mortgage they want, but it’s important that they truly understand the commitment and if it’s right for their circumstances.

You should be alert to any evidence that a potentially vulnerable customer is entering into a commitment which they don’t understand or are being coerced into taking an action which may not be in their best interests.

Vulnerable customers may require further help with their mortgage application and the following information in this document will give you guidance on what you should do in these cases.

Signs of vulnerability could include temporary situational issues or inherent issues.

**Inherent issues**
- Dementia
- Long term illness
- A disability

**Temporary situational issues**
- Bereavement
- Divorce
- Redundancy
Identifying vulnerability

Please consider the following during all customer interactions to help identify vulnerability (BRUCE):

**Behaviour and talk:** is the customer acting out of character? Look for indicators of vulnerability through the customer’s behaviour and speech.

**Remembering:** is the customer experiencing problems with their memory or repeatedly requesting information? Is the customer confused when asked basic questions such as personal details?

**Understanding:** is the customer showing they understand all of the information they are being provided with? Are they able to replay that information to you in a coherent manner? This would include the customer showing they understand the potential consequences both of making or not making their decision.

**Communicating:** can the customer communicate their thoughts and questions and are they ultimately able to make an informed decision?

**Evaluating:** can the customer weigh up the information and options open to them to make an informed decision?

A negative response to one or more of these questions, at any time during the meeting, suggests that further clarification is required as the customer could be vulnerable.
Vulnerability identified

It’s important to consider the most appropriate action to take when you identify a potential vulnerable customer:

- **Additional time:** allow the customer additional time to understand, retain, use and weigh up the information provided to make an informed decision, e.g. offering the customer a further appointment(s). Are you supporting that customer in understanding the information? Can you adapt the speed you deliver the information to the customer to support them further? How could you make this information as easy to understand as possible for the individual customer needs? Think about alternative options for the customer.

- **Additional party:** provide the opportunity to bring a family member/friend/third party who could help to support weighing up the information before making an informed decision. You can also check, if appropriate, to see if a Power of Attorney or Court of Protection is in place to make decisions about their financial affairs on their behalf.

- **Translator:** this should also be considered for customers who don’t speak English and are looking to take a mortgage with Santander.

Under no circumstances should any sale proceed if the customer is not capable of understanding the information or advice given to them.
Supporting and documenting

The TEXAS model can help you to structure the conversation and record where the customer has disclosed sensitive information indicating a potential vulnerable customer.

**Thank them** as it may have been a big step for a customer to share their situation with us, it’s important to acknowledge this and put them at ease.

**Explain** any information will be captured and used to match their needs to an appropriate product or service and that they won’t need to repeat themselves when talking to us.

The customer must provide **explicit consent** and confirm they’re comfortable for you to record any sensitive information about their circumstances.

**Ask** some additional questions, for example, do you require any additional time to make a decision to proceed? Is there any additional support you would like? Would you like to invite a family member to the meeting?

**Signpost** any potential support required, e.g. are there any appropriate third party support groups or charities which may help the customer? Please see page 6 for more information.

**Santander customers**

- If you have a new Santander customer and you’ve identified a vulnerability that you’d like us to be aware of, please record the details within the notes on the application if your customer is happy for you to do so.

- For existing Santander customers who are in financial difficulty and who need specialist support, please advise the customer to call Santander on **0800 085 0951**. If you’d like to deal with this on their behalf, we’d need a signed letter from your customer giving authority for you to do so, or for the customer to be present when you call.

- Disclosure of these issues won’t negatively affect their application but will help us to make sure our customers get the best service.
There are many organisations that can provide help and support to customers. Here’s a list of some of them and their contact information:

<table>
<thead>
<tr>
<th>Organisation</th>
<th>Telephone</th>
<th>Website</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alzheimer’s Society</td>
<td>0300 222 1122</td>
<td><a href="http://www.alzheimers.org.uk">www.alzheimers.org.uk</a></td>
</tr>
<tr>
<td>Age UK</td>
<td>0800 055 6112</td>
<td><a href="http://www.ageuk.org.uk">www.ageuk.org.uk</a></td>
</tr>
<tr>
<td>Macmillan Cancer Care</td>
<td>0808 808 0000</td>
<td><a href="http://www.macmillan.org.uk">www.macmillan.org.uk</a></td>
</tr>
<tr>
<td>Mind</td>
<td>0300 123 3393</td>
<td><a href="http://www.mind.org.uk">www.mind.org.uk</a></td>
</tr>
<tr>
<td>Citizens Advice Bureau</td>
<td>03444 111 4444</td>
<td><a href="http://www.citizensadvice.org.uk">www.citizensadvice.org.uk</a></td>
</tr>
<tr>
<td>Samaritans</td>
<td>116 123</td>
<td><a href="http://www.samaritans.org">www.samaritans.org</a></td>
</tr>
<tr>
<td>StepChange Debt Charity</td>
<td>0800 138 1111</td>
<td><a href="http://www.stepchange.org">www.stepchange.org</a></td>
</tr>
<tr>
<td>Victim Support</td>
<td>0808 168 9111</td>
<td><a href="http://www.victimsupport.org.uk">www.victimsupport.org.uk</a></td>
</tr>
<tr>
<td>Cruse Bereavement Care</td>
<td>0808 808 1677</td>
<td><a href="http://www.cruse.org.uk">www.cruse.org.uk</a></td>
</tr>
<tr>
<td>Mencap</td>
<td>0808 808 1111</td>
<td><a href="http://www.mencap.org.uk">www.mencap.org.uk</a></td>
</tr>
</tbody>
</table>
Our purpose is to help people and business prosper. Our culture is based on believing that everything we do should be.

Thank you.