

# Your guide to disclosing a customer's vulnerability



# What's covered

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- Vulnerable categories
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- Customer conversations – How to structure the conversation with your customer
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# Disclosing vulnerability

If a new Santander customer has a vulnerability that they want to share, please record this in the application notes.

If an existing Santander customer needs extra support or is in financial difficulty, please ask them to call us on **0800 085 1135**. If you are acting on their behalf, we will need either:

- a signed letter of authority from the customer, or
- the customer to be present during the call.

**Sharing this information will not affect the application. It helps us give the right support.**



# Vulnerable categories



## Physical

Customers impacted by a physical limitation or impairment, e.g. a disability or condition that impacts their ability to manage their finances. This could include:

- customers who are deaf or have a hearing impairment
- customers who are blind or visually impaired.



## Emotional

Customers affected by an emotional situation or condition that impacts their ability to manage their finances. This could include:

- bereavement



## Communication

Customers impacted by a condition or situation that makes communication more difficult. This could include customers who:

- don't speak English or it's not their first language
- are deaf, blind, or have a hearing or visual impairment which impairs their ability to communicate.



## Cognitive

Customers might be impacted in their ability to quickly or easily make decisions. They may have difficulty understanding or an issue impacting their memory. This could include:

- mental health conditions
- neurodiverse conditions such as dyslexia, ADHD and autism.



## Financial

Customers impacted financially by their situation. This could include:

- loss of income
- relationship breakdown.



## Caring for another person

Customers impacted due to their caring responsibilities for another person. They may have to:

- give up work
- manage the finances of another person.



If you need to disclose a vulnerability on a customer's behalf, head to [our disclosure guide](#).

# Vulnerable categories



## Contacting the customer

Customers in a situation that means it may be difficult for us to contact them. The customer may be:

- homeless
- in an abusive relationship.



## Gambling

Customers impacted by gambling activities. This might have a negative impact on finances, relationships, health or work.



## Other

The customer's situation impacts ability to manage finances but doesn't fit other categories.

Use your best judgement to assign the information to an appropriate category. But if you feel that none of the others could be appropriate, you can select 'Other'.



## Domestic or financial abuse

Customers impacted by domestic, economic or financial abuse. This may be by a partner, family member, carer or someone else.

Abuse may be current or historic, and may pose risks to customer's safety, wellbeing or ability to manage their finances.



# Understanding vulnerability

The FCA (Financial Conduct Authority) defines a vulnerable customer as someone who, due to their personal circumstances, is especially susceptible to harm. Particularly when a firm isn't acting with appropriate levels of care.

All customers are at risk of becoming vulnerable. This risk is increased by having traits of vulnerability. These could be:

- poor health, such as cognitive impairment
- life events such as new caring responsibilities
- low resilience to cope with financial or emotional shocks
- low capability, such as poor literacy or numeracy skills.

It's important to identify vulnerable customers so we can give the right support. If we do not identify vulnerability, customers may receive poor outcomes.

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# Identifying vulnerability

The BRUCE protocol can be used when working with customers to help identify needs and support decision-making.

## Behaviour and talk

Are they acting out of character? Do they appear confused or are they relying on a third party for help? Changes in behaviour or speech may show vulnerability.

## Remembering

Is your customer having memory problems or asking for the same information to be repeated? Are they confused when asked basic questions such as personal details?

## Understanding

Do they understand the information? Can they explain the information clearly?

## Communicating

What's their style of communication? Are they responding in a way that's expected? Can they share their thoughts and questions? Are they able to make an informed decision?

## Evaluating

Is your customer understanding all the options? Are they able to weigh up the information and make an informed decision?

If the answer to any of these questions is no, the customer might be vulnerable.

## Things to consider

It's important to consider the best action to take when you identify that your customer may be vulnerable.

## Additional time

Give the customer extra time to understand the information. For example, this could mean offering an extra appointment. Have you communicated to suit their specific needs? Could you make this information easier to understand?

## Additional party

Offer the customer the option to bring a family member or friend for support. You could check to see if a Power of Attorney or Court of Protection is in place.

## Translator

This should be considered for customers who don't speak English and are looking to take out a mortgage with us.

**A sale should never go ahead if the customer cannot understand the information or advice they are given.**



If you need to disclose a vulnerability on a customer's behalf, head to [our disclosure guide](#).

# Customer conversations

## TEXAS model

The **TEXAS** model can help structure conversations and record customer vulnerability.

**T**hank 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.

**E**xplain the information they've given will be recorded, and they won't need to repeat it.

**X** The customer must provide explicit consent for you to record any sensitive information.

**A**sk some additional questions. For example, do you need more time to decide? Is there any extra support you'd like? Would you like to invite a family member to the meeting?

**S**ignpost any potential support available. For example, are there any third-party support groups or charities which may help the customer? Please see [page 6](#) for more information.

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## Customers in distress

Distressed customers may be more at risk of harm due to their personal or financial situation.

To support customers in distress here are some things you could consider.

### Creating a tailored plan

A clear plan helps customers feel more in control and encourages involvement.

### Flexible ways to communicate

Is talking on the phone the best way to interact with your customer? Are they more responsive through email or face to face? This might be something to consider when setting up a plan.

### Simplified language

Use simple language to help the customer understand. Ask if they understand certain wording to make sure, they're interpreting the information correctly.

### Documenting interactions

Having a written follow-up helps to keep information clear and consistent.

### Regular check-ins

Regular check-ins can help reduce worry about the process. Tailoring the frequency of the check-ins will be unique to each person.



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# Charities and organisations

Alzheimer's Society

[Dementia Support Line | Alzheimer's Society](#)

Age UK

[Age UK | The UK's leading charity helping every older person who needs us](#)

Macmillan Cancer Support

[Macmillan Cancer Support](#)

Mind

[Mind | Mental Health and Dementia Services](#)

Citizens Advice

[Citizens Advice](#)

GamCare

[GamCare - Founder of the National Gambling Helpline](#)

Samaritans

[Contact Us | Samaritans](#)

StepChange

[StepChange Debt Charity. Free Expert Debt Help & Advice](#)

Victim Support

[Home - Victim Support](#)

Cruse – Bereavement Support

[Home - Cruse Bereavement Support](#)

Mencap

[Learning Disability - Down syndrome - Williams syndrome | Mencap](#)

Woman's Aid

[Home - Women's Aid](#)

