CONSUMER DUTY POLICY -VULNERABLE ADULTS

Formerly Vulnerable Adults policy
Based on national guidance, The Care Act 2014 & The Debt Management Vulnerability Toolkit

FCA Guidance can be accessed from
https://www.fca.org.uk/publication/finalised-guidance/fg21-1.pdf

HM Government Debt Management Vulnerability Toolkit for service and policy managers will be downloaded from
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1148597/Debt_Management_Vulnerability_Toolkit_for_service_and_policy_Managers_V2.pdf

In addition all Huntingdon Area Money Advice (HAMA) Staff, trustees and volunteers will be made aware of how these documents and toolkit can be accessed.

The Objectives of this policy are

- To provide an environment in which vulnerable adults feel safe and valued.
- To ensure that staff and volunteers ('personnel') and Trustees take responsibility to protect vulnerable adults from harm at all times.
- To elect a member of the Trustees as the designated representative for all vulnerable adult matters (Consumer Champion), and to identify appropriate training opportunities for that member.
- To develop and adopt a set of guidelines/code of conduct for working with vulnerable adults, which all members, personnel are aware of and adhere to.
- To exercise a *Duty of Care* and, when necessary, share information and/or concerns in a confidential manner with the appropriate outside agency e.g. Social Services.
- To ensure that all personnel who work with, or have responsibility for, vulnerable adults are checked under the Disclosure Barring Scheme in accordance with the specific requirement of DBS for our service.
- To ensure all new personnel are introduced to guidelines for working with vulnerable adults and conversant with HAMA's policy and procedures.
- To ensure appropriate training is in place for all HAMA personnel
- To review and update this policy and practice annually.

This policy is to make sure that HAMA has all the right things in place to be able to identify a vulnerable client and know the correct process and procedures when helping them to provide the best service possible

Mission

HAMA is committed to ensuring the best possible service provision alongside the protection of vulnerable adults through the development and implementation of effective policies and best practice.

Members of HAMA Trustees, staff and volunteers, recognise and accept the responsibility to develop and raise awareness of the issues involved in working with vulnerable adults.

Definition

The FCA's definition of vulnerability refers to clients who, due to their personal circumstances, are especially susceptible to harm, particularly when an advice centre is not acting with appropriate levels of care. Advice personnel should think about vulnerability as a spectrum of risk. All clients are at risk of becoming vulnerable and this risk is increased by characteristics of vulnerability related to 4 key drivers.

1. ***Health*** *- a condition or illness affecting the ability to carry out daily tasks*
2. ***Life events*** *- these events include bereavement, job loss or retirement*
3. ***Resilence*** *- reduced ability to withstand financial or emotional shock*
4. ***Capability*** *- low confidence and confidence in managing money/financial matters includes low capability in literacy and numeracy*

Alongside this the formal definition of a vulnerable adult is as follows:

'A person who is eighteen years of age or over, and who may be in need of community care services by reason of mental or other disability, age or illness, and who is or may be unable to take care of him/herself, or unable to protect him/herself against significant harm or exploitation.'
("Who Decides":1997, Lord Chancellor's department)

Therefore HAMA personnel will fully endeavour to understand what types of harm or disadvantage clients may be vulnerable to, and how their own actions can increase or reduce the risk of harm.

Clients may be too afraid or embarrassed to talk about their vulnerability or raise any complaint and also may be reluctant to discuss their concerns with HAMA personnel or unsure who to trust or approach with their worries. HAMA personnel will provide every client the opportunity to self-disclose and HAMA will operate multiple channels and routes to encourage clients to share information about their vulnerability and any associated needs.

HAMA personnel will also let all clients know, from the outset, that disclosing a vulnerable situation will enable them to be provided with any additional support as necessary.

In addition, there may be some situations where clients are unaware that they are vulnerable, don't categorise themselves as such or have difficulty in communicating this information to others therefore HAMA personnel will be trained to recognise 'red flags' including;

- Individual factors – passing mentions of illness, disability or impairment; reference to contact with the health sector or social care sector; reference to the receipt of specific benefits, inability to understand language, read or write.
- Behavioural cues - sounding flustered, anxious, confused or asking unrelated questions.
- Wider circumstances – excessive or unusual expenditure, life events (such as time in hospital, imprisonment, bereavement, income shocks).
- Organisational actions – reference by the customer to things that have or haven't been done that have caused difficulty.

Disclosures of vulnerability

HAMA personnel will employ the TEXAS* protocol to support vulnerable clients

T Thank the client

E Explain how the information will be used under GDPR

X Gain eXplicit consent under GDPR to record information

A Ask the client questions to get key information about how their situation affects them in relation to the advice sought including the use of IDEA framework

S Signpost or refer to internal or external help if appropriate

HAMA recognises that it is important to recognise the role that personnel play in meeting the needs of vulnerable clients as these clients are more likely to suffer harm if personnel do not understand how vulnerability is relevant to their role, or if frontline personnel do not have the skills and capability to recognise and respond to their needs.

HAMA will endeavour to understand and respond to each individual client's need through the use of the **IDEA Framework*** by looking at and understanding the following for each situation

I Impact

D Duration of circumstances

E Experience

A Assistance needed

HAMA will ensure that personnel have the necessary skills and capability to recognise and respond to a range of characteristics of vulnerability and be able to offer practical and emotional support to frontline personnel dealing with vulnerable consumers.

Training

In addition to the vulnerability training within CMA's Level 3 training course, all HAMA personnel will be expected to access additional training on helping vulnerable Clients via **Wiseradviser's** Understanding and Supporting Clients in Vulnerable Circumstances - E-learning course or equivalent.

All HAMA personnel will have the opportunity within regular sessions to share knowledge and experiences of managing vulnerable clients with other personnel members as well as 1 to 1 debriefing sessions with the Centre Manager to help improve the level of support and increase understanding of how to take into account vulnerable clients when performing their duties. Ongoing training relevant to their role within HAMA will be discussed within each personnel member's annual appraisal.

Rights of vulnerable adults

The vulnerable adults have the right to:

- be made aware of this policy.
- have alleged incidents recognised and taken seriously.
- receive fair and respectful treatment throughout.
- be involved in any process as appropriate.
- receive information about any outcomes.

The Centre Manager will be responsible for overseeing and the implementation of this policy

This Policy is to be used in conjunction with Safeguarding Policy & Treating Clients Fairly Policy

Approved by Trustees 14th July 2026

Due for Review July 2027