

A woman with long dark hair, wearing a yellow shirt, is shown in profile, looking at a laptop. In the background, a large monitor displays lines of code. The setting appears to be a modern office or development environment with a window and some plants visible.

JUST.

VULNERABILITY DATA CAPTURE IRIS SYSTEM CHANGES

NEW WAY OF CAPTURING DATA ABOUT OUR VULNERABLE CUSTOMERS

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In 2019, we introduced vulnerability flags in Iris to record customers' support needs.

This means customers only need to tell us once, and our teams can support them appropriately each time they contact us.

We are now more outcome-focused and want to use this information to better understand and monitor outcomes for customers with characteristics of vulnerability.

However, the existing data fields do not provide the level of detail needed to achieve this.

As a result, we have updated the data fields, and this session will introduce the new fields and how to use them



**WE'RE IMPROVING
HOW WE CAPTURE
DATA ABOUT OUR
VULNERABLE
CUSTOMERS**

OVERVIEW OF TRAINING

The aim of this session will be to:

- Walk you through the **new drop-down fields** and how to use them
- Explain how to **view vulnerability information** once it has been recorded
- Show what **migrated / older data** may look like in the system
- Identify your responsibility in keeping vulnerability **data accurate and relevant**
- Share how we can be more **proactive when identifying vulnerability** by asking a disclosure question
- Work through **practical examples** to show how this applies in real customer conversations



NEW DATA FIELDS AND HOW TO USE

OVERVIEW OF TRAINING

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- Vulnerability identified
- Who has disclosed
- Source of disclosure
- Basis for processing
- Date flag added and date last updated (auto populate)
- Permanent or temporary characteristic
- Characteristics
- Drivers (auto populate)
- Adaption required
- Review date (only where vulnerability temporary)
- How can we adapt
- Signposted to NSN
- Referral needed
- Notes (free text)

Vulnerable Customer

454712 Mrs SCR-Christine Ann SCR-Smith

Vulnerability identified
Yes - Adaption needed

Who has disclosed
Customer

Source of disclosure
Phone call

Basis for processing
Consent

Flag added
07/09/2021

Last updated
04/12/2025

Permanent / Temporary
Permanent

Adaption required
Until a specific date

Review date
04/06/2026

How can we adapt

Description	Selected
Adapt process - Other	☒
Appointment - Longer time slots needed	☒
Adapt process - Pre-populate forms	☐
Adapt process - Prioritise tasks	☐
Adapt process - Use a stamp instead of a physical signature	☐
Appointment - Additional support in face to face meetings	☐
Appointment - Calls at preferred times	☐
Appointment - Shorter time slots needed	☐
Communication preference - Audio	☐

Signposted to NSN
No

Referral needed
Vulnerable Customer Champion

Additional notes

Cancel

Save

Characteristics

Description	Driver	Selected
Bereavement / Loss	Life events	☒
Speech impairments	Health	☒
Addiction	Health	☐
Brain injury	Health	☐
Caring responsibilities	Life events	☐
Cognitive disability	Health	☐
Customer in crisis	Life events	☐
Dementia	Health	☐
Divorce	Life events	☐

VULNERABILITY IDENTIFIED

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This new data field will replace the Green, Amber, Red rating.

Vulnerable Customer

454712 Mrs SCR-Christine Ann SCR-Smith

Vulnerability identified

Yes - No adaption
No
Yes - Adaption needed
Yes - No adaption

Who has disclosed

Customer

Basis for processing

Consent

Flag added

07/09/2021

Last updated

07/09/2021

Permanent / Temporary

Permanent

No

Use this option in instances where we have **taken proactive steps to identify vulnerability and the customer does not present any characteristics** that could mean they are vulnerable and need additional or different support needs.

Examples would be if we ask customer outright if they have any support needs and they respond no, and there are no subsequent triggers that indicate they could be vulnerable.

Or if we have sent a Customer Wellbeing Questionnaire and the report shows no indicators of vulnerable (Green).

When you select this option, you will only be asked to complete source of disclosure

No explicit consent is required as we are not recording any personal information

Yes –no adaption needed

Use if this option where we have identified a characteristic of vulnerability, but the customer does not need us to adapt our process/ or the way we communicate with them.

This would cover instances where customers have their own support in place.

For adaptations select 'No support required' or 'Support already in place'

Yes –adaption required

We would select this option where there is a characteristic of vulnerability present, and the customer would benefit from us adapting our process/ or the way we communicate with them.

WHO HAS DISCLOSED

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AUTO-POPULATE

This will auto-populate to customer

In some situations, we will be told about our customers' support needs from another party, such as an adviser, family member or shared with us by an external agency such as Vulnerability Registration Service.

Ensure you have followed your local processes and have the appropriate consent to be able to record this information.

If we have used 'legitimate interest' to record, then the flag will need to be added by someone with the appropriate level of authority to approve this (VC Champ, VC Team, MLRO or DP Champ)

Vulnerable Customer

454712 Mrs SCR-Christine Ann SCR-Smith

Vulnerability identified

Yes - No adaption

Source of disclosure

Other

Flag added

07/09/2021

Last updated

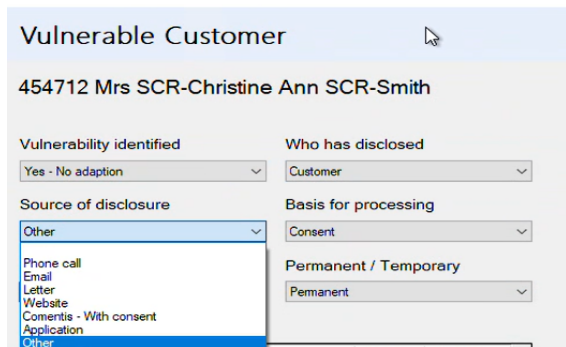
07/09/2021

Who has disclosed

Customer

Customer
Adviser
Paraplanner
Family member / Spouse / Partner
Carer
POA
Data Share
Permanent

SOURCE OF DISCLOSURE



Vulnerable Customer

454712 Mrs SCR-Christine Ann SCR-Smith

Vulnerability identified Yes - No adaption	Who has disclosed Customer
Source of disclosure Other Phone call Email Letter Website Comentis - With consent Application Other	Basis for processing Consent
	Permanent / Temporary Permanent

You can select multiple options from drop down boxes – where appropriate

This is the channel where we first found out about the support needs.

You're able to select multiple options if the customer shares information in a multitude of channels.

If there is an existing 'flag' on the policy and the customer completes a Wellbeing Questionnaire (Comentis), then also tick this as a source of disclosure.

This will be an indicator to anyone else who views policy that there will also be a report attached to the policy.

BASIS FOR PROCESSING

Vulnerable Customer

454712 Mrs SCR-Christine Ann SCR-Smith

Vulnerability identified

Yes - No adaption

Who has disclosed

Customer

Source of disclosure

Other

Basis for processing

Consent
Legitimate interest
Vital interest

Flag added

07/09/2021

Last updated

07/09/2021

This is your attestation that you have the appropriate level of consent to record our customers' data in a legal way using TEXAS.

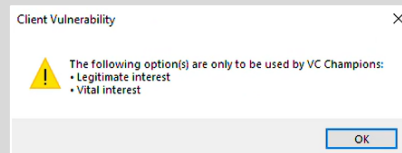
In some specific instances where we're unable to obtain explicit consent, we may use either legitimate or vital interests as our basis for recording vulnerability.

Your VC Champ or DP Champ will be able to approve this and will need to override 'explicit consent'.

Check your local processes for guidance on how to do this.

Unless you are in a security group you will only be able to select 'Explicit consent' as this is our preferred basis for recording.

You will see the following error message if you try and select one of the other messages.



DATE FLAG ADDED AND DATE LAST UPDATE



AUTO-POPULATE

Both these boxes will auto-populate when changes are made to the overall records.

It is an indicator as to how recent and relevant the information we have about our customers support needs. When looking at an existing flag you can use this information to help shape your conversation about support needs.

Vulnerable Customer

454712 Mrs SCR-Christine Ann SCR-Smith

Vulnerability identified	Who has disclosed
Yes - No adaption	Customer
Source of disclosure	Basis for processing
Other	
Flag added	Last updated
07/09/2021	07/09/2021
Permanent / Temporary	
Permanent	

PERMANENT OR TEMPORARY CHARACTERISTIC

The screenshot shows a form titled 'Vulnerable Customer' for a customer named '454712 Mrs SCR-Christine Ann SCR-Smith'. The form includes several dropdown menus and date fields. The 'Vulnerability identified' dropdown is set to 'Yes - No adaption'. The 'Who has disclosed' dropdown is set to 'Customer'. The 'Source of disclosure' dropdown is set to 'Other'. The 'Basis for processing' dropdown is set to 'Consent'. The 'Flag added' date is '07/09/2021' and the 'Last updated' date is '04/12/2025'. The 'Permanent / Temporary' dropdown is open, showing options: 'Permanent', 'Temporary', and 'Unknown'. The 'Characteristics' section has a 'Description' field.

Vulnerable Customer	
454712 Mrs SCR-Christine Ann SCR-Smith	
Vulnerability identified	Who has disclosed
Yes - No adaption	Customer
Source of disclosure	Basis for processing
Other	Consent
Flag added	Last updated
07/09/2021	04/12/2025
Permanent / Temporary	
Permanent	
Temporary	
Unknown	
Characteristics	
Description	

Permanent vulnerability is a long-term or ongoing condition, such as chronic illness, disability or chronic impairment that consistently affect a person's ability to manage daily life or make decisions.

Temporary vulnerability refers to a short-term situation where a customer's ability to cope or manage is reduced due to their situation or condition – such as certain life events, some illnesses or financial circumstances.

There may be situations where it's unclear whether a person's vulnerability is permanent or temporary, because vulnerability can be influenced by health, life events, and personal circumstances that may change over time. If this is the case, then select Unknown.

Vulnerable Customer

454712 Mrs SCR-Christine Ann SCR-Smith

Vulnerability identified: Yes - No adaption
Who has disclosed: Customer
Source of disclosure: Other
Basis for processing:
Flag added: 07/09/2021
Last updated: 07/09/2021
Permanent / Temporary: Permanent

Characteristics

Description	Driver	Selected
Other capability challenge	Capability	☐
Addiction	Health	☐
Bereavement / Loss	Life events	☐
Brain injury	Health	☐
Caring responsibilities	Life events	☐
Cognitive disability	Health	☐
Customer in crisis	Life events	☐
Dementia	Health	☐
Divorce	Life events	☐

This is a complete list of characteristics we typically see in our customer base. Each characteristics automatically mapped to the corresponding driver. For example, sight is a health driver

There is a slider on the side which you can use to scroll through the list. When first adding a record, the list will appear alphabetically. But you can also re-order the list by clicking on the header 'description' or 'driver'

When a flag has been added and characteristics selected the characteristics ticked will appear at the top of the list.

Many of our customers have more than characteristic of vulnerability. In these instances, you can select multiple characteristics.

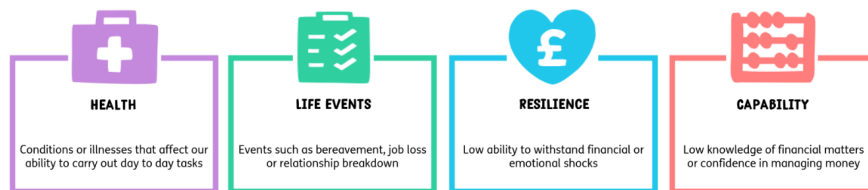
The FCA have defined four drivers of vulnerability – Health, Life events, Resilience, Capability
These will replace the 3C's - Circumstance, Channels and Access and Capability.

This data field will auto-populate dependant on what characteristic(s) you select.

This change will provide you with more information about customers' circumstances, and what they have told us. And will improve reporting capability.

CHARACTERISTICS AND DRIVERS

This is a complete list of characteristics we typically see in our customer base and the corresponding driver.



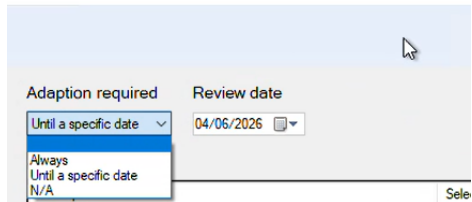
Health
Addiction
Dementia / Cognitive disability or brain injury
Hearing
Mental health condition or disability
Physical disability
Severe or long term illness
Sight
Speech impairments
Other health challenges (add details to notes)

Life events
Bereavement / loss
Caring responsibilities
Customer in crisis (refer to VC Champ)
Divorce
Domestic / social economic abuse
MLRO case (only to be used by financial crime)
Moving into long term care
Relationship breakdown
Unemployed / redundancy
Victim of fraud or scams
Other life event (add details to notes)

Resilience
Financial difficulties
Loneliness / no social support
Other resilience challenge (add details to notes)

Capability
Learning difficulties
Low financial capability
Neurodiversity
No or low access to help or support
Poor English skills
Poor numeracy or literacy skills
Poor or non-existent digital skills
Other capability challenge (add details to notes)

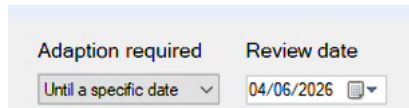
ADAPTIONS REQUIRED AND REVIEW DATE



A screenshot of a web form with two fields: 'Adaption required' and 'Review date'. The 'Adaption required' dropdown menu is open, showing three options: 'Always' (highlighted in blue), 'Until a specific date', and 'N/A'. The 'Review date' field contains the date '04/06/2026' and a calendar icon. A 'Sele' button is partially visible at the bottom right.

Some characteristics are permanent, and it is likely that adaptations we agree will be required every time customer interacts with us. For these situations select 'Always'.

Sometimes vulnerability is intermittent. It can come and go – depending on circumstance. In these instances, select 'until a specific time'.



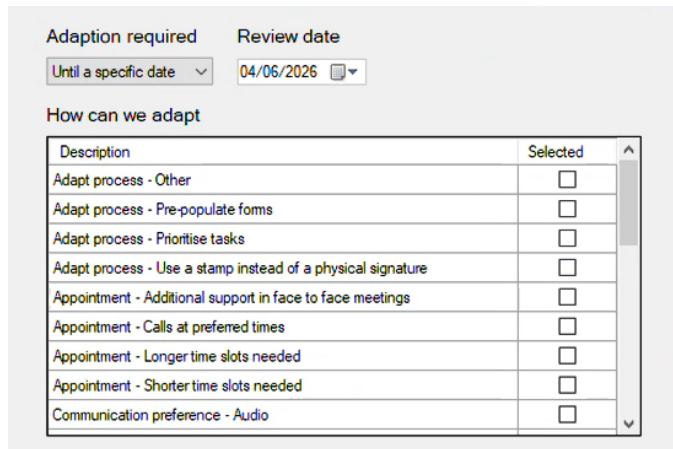
A screenshot of a web form with two fields: 'Adaption required' and 'Review date'. The 'Adaption required' dropdown menu is open, showing three options: 'Until a specific date' (highlighted in blue), 'Always', and 'N/A'. The 'Review date' field contains the date '04/06/2026' and a calendar icon.

This is only required if agent has selected 'until a specific time' when asked whether adaptations required.

This date is when it would be appropriate to speak to the customer again about the support, they need from us when interacting. It ensures that the data we are holding is relevant and helps us support the customer in the best possible way.

You can not set this date any longer than 6 months.

HOW CAN WE ADAPT?



Description	Selected
Adapt process - Other	☐
Adapt process - Pre-populate forms	☐
Adapt process - Prioritise tasks	☐
Adapt process - Use a stamp instead of a physical signature	☐
Appointment - Additional support in face to face meetings	☐
Appointment - Calls at preferred times	☐
Appointment - Longer time slots needed	☐
Appointment - Shorter time slots needed	☐
Communication preference - Audio	☐

This is critical information to help you and your colleagues support our customers. It'll also give us more visibility in our reporting on the ways we are supporting our customers.

You can select multiple options as some customers we may need to adapt in multiple ways. We have grouped support into the following categories:

- Adapt process
- Appointment support
- Communication preference
- Decision making support
- Third party support

Just like when selecting characteristics, you have a slider on the side to scroll through the different options, and change the order of list by clicking on 'description'

Once support options have been selected colleagues will be able to see these displayed at the top of the list each time they open a customer record.

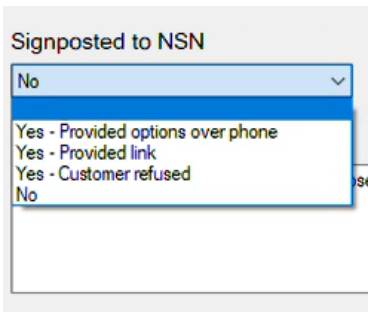
See slide 16 for full list of support options we can offer to help teams adapt to customer support needs

HOW CAN WE ADAPT?

This is a complete list of ways we can adapt to meet customers' support needs.

Adapt process	Appointment support	Communication preference	Decision making support	Third-party support
Prioritise tasks	Additional support in face-to-face meetings	Large font	Understanding	Verbal authority obtained
Pre-populate forms	Longer time slots needed	Braille	Remembering	POA / Deputyship in place / being applied for
Use a stamp instead of a physical signature	Shorter time slots needed	Audio	Understanding	Third party support - other
Adapt process - other	Calls at preferred times	Email only	Communication	
	Other	In writing	Evaluating options	
		No phone		
		Text to Talk / Relay UK		
		Video calls		
		Face to face meetings preferred (advice calls only)		
		Paper based application		
		Other		

Sometimes, customers may display a characteristic of vulnerability but do not need us to adapt to meet their needs.
In these instances, select – **No additional support required**



Signposted to NSN

- No
- Yes - Provided options over phone
- Yes - Provided link
- Yes - Customer refused
- No

NSN stands for the **National Support Network**.

When we identify vulnerability, we should always be exploring what support customer needs.

We can support customers when they interact with us – but in other situations a customer may need support from a specialist organisation.

This is when we would signpost customer to our bespoke support hub – provided by NSN.

We will either this on behalf of customer over the phone or send the link for the customer to do in their own time.

Customers may refuse – and it will be helpful for us to know this. And in other situations, it may not be necessary or appropriate to signpost support.

In future conversations with customers, you will then be able to see when we have already provided a link will enable your colleagues to tailor future conversations.

It will also enable us to monitor how many customers visit the platform and what support they are looking for.

REFERRAL NEEDED

Referral needed

N/A
Vulnerable Customer Champion
Team / People Manager
Data Protection Champion
Financial Crime Specialist
N/A

In some instances, the customer may have additional or more complex needs that may need to be referred to a specialist.

Check your **Escalation Processes** for information on when and how to escalate

Vulnerable Customer Champion is for VC Support Team, email VCSupport@wearejust.co.uk.

In scenarios where MLRO and VC Team is needed, select MLRO as priority.

If no referral is needed select N/A.



If any of these boxes are selected the hand will show as 'Red'

FOLLOW OUR EXISTING ESCALATION PROCESS

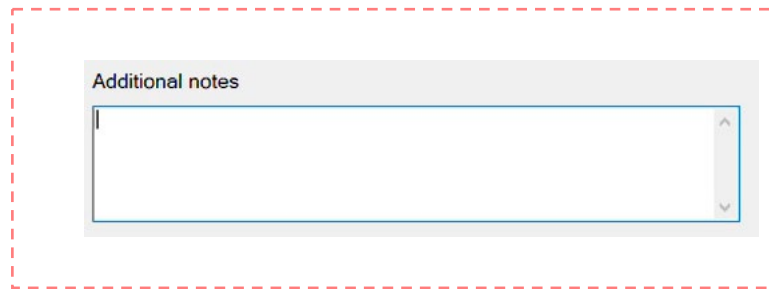
NOTES AND SAVE

This is a **free text box**

It is a place to provide additional information that helps us meet customer support needs.

Please limit the amount of information you add here (there is a maximum limit).

Too much information could mean we are capturing excessive information.

A screenshot of a user interface element labeled 'Additional notes'. It consists of a light gray rectangular container with a blue border. Inside the container is a white text input field with a vertical scrollbar on the right side. The entire container is enclosed within a dashed red rectangular border.

Here are some examples of where you would add notes:

- What type of braille (grade 1 or 2)
- How we'll help customer remember key information
- How we'll help customer understand key information
- How we'll help customers with communicate decision
- How we'll help customers weigh up options to help make decisions
- Where communication preference is not listed
- Where third party is not listed
- Where process adaption is not listed
- Reason for escalation
- Reason for using legitimate / vital interests

PRESS SAVE

If you try and exit the record without saving you will see a pop-up box that will ask you whether you want to save changes before you exit.

If you select 'cancel' again a pop-up box will appear to remind you that by pressing cancel you will lose any information you have just added.

VIEWING VULNERABILITY INFORMATION



POP UP BOX

Once vulnerability data has been added a 'pop-up' box will appear each time you open the record. Exactly as it does today.

Vulnerable Customer

27218 Mrs SCR-Sumedha Kumari
SCR-Scrymgeour

Vulnerability identified: Yes - Adaption needed
Who has disclosed: Customer

Source of disclosure: Phone call
Basis for processing: Consent

Flag added: 19/10/2021
Last updated: 26/06/2026
Permanent / Temporary: Permanent

Characteristics

Description	Driver	Selected
No or low access to help or support	Capability	☒
Addiction	Health	☐
Bereavement / Loss	Life events	☐
Brain injury	Health	☐
Caring responsibilities	Life events	☐
Cognitive disability	Health	☐
Customer in crisis	Life events	☐
Dementia	Health	☐
Divorce	Life events	☐

Adaption required: Always
Review date: []

How can we adapt

Description	Selected
Adapt process - Other	☒
Adapt process - Pre-populate forms	☐
Adapt process - Prioritise tasks	☐
Adapt process - Use a stamp instead of a physical signature	☐
Appointment - Additional support in face to face meetings	☐
Appointment - Calls at preferred times	☐
Appointment - Longer time slots needed	☐
Appointment - Shorter time slots needed	☐
Communication preference - Audio	☐

Signposted to NSN: Yes - Provided options over phone
Referral needed: Data Protection Champion

Additional notes: Content Removed for Data Protection Purposes.

Buttons: Remove, Cancel, Save

Log

1717751	04/06/2018 11:41:42	Account Event	Redemption Statement has been Completed
1717751	20/08/2019 11:47:26	Account Event	Redemption Statement has been Started

KEY THINGS TO LOOK FOR

Vulnerable Customer

454712 Mrs SCR-Christine Ann SCR-Smith

1 Vulnerability identified: Yes - Adaption needed

5 Source of disclosure: Phone call

6 Flag added: 07/09/2021, Last updated: 04/12/2025

Who has disclosed: Customer

Basis for processing: Consent

Permanent / Temporary: Permanent

4 Adaption required: Until a specific date

2 Review date: 04/06/2026

3 Additional notes: Customer prefers to make notes through conversation and requires us to send a summary after call

Description	Selected
Adapt process - Other	☒
Appointment - Longer time slots needed	☒
Adapt process - Pre-populate forms	☐
Adapt process - Prioritise tasks	☐
Adapt process - Use a stamp instead of a physical signature	☐
Appointment - Additional support in face to face meetings	☐
Appointment - Calls at preferred times	☐
Appointment - Shorter time slots needed	☐
Communication preference - Audio	☐

Description	Selected
Bereavement / Loss	☒
Speech impairments	☒
Addiction	☐
Brain injury	☐
Caring responsibilities	☐
Cognitive disability	☐
Customer in crisis	☐
Dementia	☐
Divorce	☐

Signposted to NSN: No

Referral needed: Vulnerable Customer Champion

Cancel Save

Key things to look for

1. Check **vulnerability indicator** to see if vulnerability has been identified
2. If 'Yes' and support needed, then check what **adaptations** have been agreed – as this was not recorded in old systems for a temporary period this will show as 'other'
3. Check **Additional Notes** for any additional information
4. If vulnerability is temporary or circumstantial then check **review date**. If review date is close / or past, then use IDEA to understand customers current support needs
5. If we have noted 'Wellbeing Questionnaire' as **source of disclosure** you may want to have a look at report
6. **Date last updated** – its important data is accurate and up-to-date, so we want to make sure what we have recorded is still appropriate

VULNERABILITY INDICATORS – THE HAND



There will continue to be a 'hand' on the front screen to indicate that we have taken steps to identify vulnerability.

This will typically be 'blue' if there are any details in these fields – this will include when we have proactively checked for vulnerability and was not present.

In instances where the customer has been escalated the hand will show as 'Red' (this feature is coming soon)



In instances where the customer has been escalated the hand will show as 'Red' (this feature is coming soon)



KEEPING DATA ACCURATE AND RELEVANT



UPDATING LEGACY DATA

25

At the point we created new data fields we had over 6,000 customers flagged as vulnerable and we needed to migrate this data over. However, many of the new fields will show as 'other' as this information may have been missing or was captured in free text box.

The screenshot shows a web form titled 'Vulnerable Customer' for a customer named '454712 Mrs SCR-Christine Ann SCR-Smith'. The form contains several sections:

- Vulnerability identified:** A dropdown menu set to 'Yes - Adaption needed'.
- Who has disclosed:** A dropdown menu set to 'Customer'.
- Source of disclosure:** A dropdown menu set to 'Phone call'.
- Basis for processing:** A dropdown menu set to 'Consent'.
- Flag added:** A date field showing '07/09/2021'.
- Last updated:** A date field showing '04/12/2025'.
- Permanent / Temporary:** A dropdown menu set to 'Permanent'.
- Characteristics:** A table with columns 'Description', 'Driver', and 'Selected'. It lists various conditions like 'Bereavement / Loss', 'Speech impairments', 'Addiction', etc., with checkboxes in the 'Selected' column.
- Adaption required:** A dropdown menu set to 'Until a specific date'.
- Review date:** A date field showing '04/06/2026'.
- How can we adapt:** A table with columns 'Description' and 'Selected'. It lists various adaptation options like 'Adapt process - Other', 'Appointment - Longer time slots needed', etc., with checkboxes in the 'Selected' column.
- Signposted to NSN:** A dropdown menu set to 'No'.
- Referral needed:** A dropdown menu set to 'Vulnerable Customer Champion'.
- Additional notes:** A text area for additional information.
- Buttons:** 'Cancel' and 'Save' buttons at the bottom right.

We have been able to map some of the existing data fields over.

- Anything flagged as **GREEN** we marked these as 'vulnerability identified' = 'Yes – no adaption' and for anything flagged as **AMBER** we marked as 'Yes – adaption required'
- For anything flagged as **RED** we marked these as 'Referral needed' = VC champ
- We have also recently added new data fields where we could capture in what format customer wanted to receive their comms – such as large print, audio or braille. We have been able to map these over so we still have this information.
- A lot of data will migrate over as 'other' as it previously had not been updated

MIGRATION EXAMPLE

26

Previous Screen

Potential Vulnerability

Client: 7248 - Mrs Mavis Fay Dodds

☒ Channel & Access
☐ Comprehension
☐ Circumstance Circumstance Review Date
☒ Customer confirmed future communication format

Communication Preferences

☐ Audio
☒ Large Print
☐ Braille
☐ Other (Please Specify)

RAG Status: Green Amber Red

Notes:
14/10/22 The dependant is visually impaired. all letters need to be sent in large print. permission to note

VULNERABILITY

Step 1 - Levels of vulnerability
Consider the level of vulnerability the customer is facing.

Potentially vulnerable
If a customer is currently able to manage their finances and make informed decisions, they are neither vulnerable (amber) nor particularly vulnerable (red).
Whilst they may be fine at the moment things can change, and in this respect, our customers are all potentially vulnerable.

Vulnerable
Something's changed. And the customer is currently more exposed to harm, loss, or disadvantage than others. We may need to adapt our approach, processes, procedures and/or systems to achieve an appropriate outcome for the customer.
Our aim here is to support the customer throughout the period of vulnerability and return them to being 'potentially vulnerable' over time.

Particularly vulnerable
Customers who are currently at great risk of experiencing detriment. This detriment could happen soon and could be far more serious in terms of its negative impact on the customer's situation. Identify these customers quickly and take swift action to avoid significant harm occurring.
Any customer who is facing mental capacity limitations and/or mental health problems will be classified as 'particularly vulnerable' over time.
Any customer who may be either the victim or perpetrator of financial crime will also be classified as 'particularly vulnerable' - in all instances please follow our suspicious activity reporting process and refer to MLRO@wearejust.co.uk. Never tell a customer (or a third party) that they are being investigated. If in doubt, stall and consult with your line manager or MLRO about what to say.

Step 2 - Cause of the vulnerability

New Screen

Vulnerable Customer

7248 Mrs SCR-Kathleen SCR-Kelly

Vulnerability identified
Yes - Adaption needed

Who has disclosed
Customer

Source of disclosure
Other

Basis for processing
Consent

Flag added
14/10/2022

Last updated
28/11/2023

Permanent / Temporary
Permanent

Characteristics

Description	Driver	Selected
Other health challenges	Health	☒
Sight	Health	☒
Addiction	Health	☐
Bereavement / Loss	Life events	☐
Brain injury	Health	☐
Caring responsibilities	Life events	☐
Cognitive disability	Health	☐
Customer in crisis	Life events	☐
Dementia	Health	☐

Adaption required
Always

Review date

How can we adapt

Description	Selected
Communication preference - Large font	☒
Other / Unknown	☒
Adapt process - Other	☐
Adapt process - Pre-populate forms	☐
Adapt process - Prioritise tasks	☐
Adapt process - Use a stamp instead of a physical signature	☐
Appointment - Additional support in face to face meetings	☐
Appointment - Calls at preferred times	☐
Appointment - Longer time slots needed	☐

Signposted to NSN
No

Referral needed
N/A

Additional notes
Content Removed For Data Protection Purposes.

Part of the migration some fields may have 'other' selected in key fields, if this is the case, select the relevant option from the drop-down list.

*****UPDATING VC RECORD AS AND WHEN YOU TOUCH A POLICY IS A MUST. THIS WILL FORM PART OF YOUR PROCESSING AND QA.*****

If the selection from the drop-down fields are not present, use the information from the free text box to update accordingly.

VC DATA NEEDS UPDATING POST MIGRATION

As we work policies, we must review and update any vulnerability data that has been migrated into the new fields.

Vulnerability is not static, so we should remain alert to signs that recorded information may be outdated, inaccurate, or no longer relevant.

PART OF THE MIGRATION SOME FIELDS MAY HAVE 'OTHER/UNKNOWN' SELECTED IN KEY FIELDS, IF THIS IS THE CASE – SELECT THE RELEVANT OPTION FROM THE DROP-DOWN LIST. IT'S EVERYONE'S RESPONSIBILITY TO KEEP THIS DATA UP TO DATE AND ACCURATE.

What to do when you come across a policy that needs updating

- Review the VC information we have on file to assess its accuracy and relevance to customer's current circumstances.
- Contact the customer to get an update to their circumstances and support needs.
- If the review date has passed and after checking with the customer the adaption needs have changed, update the VC record with new information.
- If the selection from the drop-down fields are not present, use the information from the free text box to update accordingly.

Some changes can only be made by authorised persons. This will apply if:

- We have legitimate consent to record
- Policy has been escalated to a VC or DP Champ or Team Manager)

KEEPING DATA ACCURATE AND RELEVANT

Remember, vulnerability is not static, so we should remain alert to signs that recorded information may be outdated, inaccurate, or no longer relevant.

Triggers when we need to update information

- Review date is due / or past
- Customer gives us new information which means support needs have changed
- Support was in place, but this support is no longer in place
- Customer has completed a Wellbeing Questionnaire, and we have additional information about customer
- We have signposted customer to NSN
- The customer's vulnerability was temporary due to a circumstance – and this now past
- The information was migrated before new data fields – so some fields will show as other (see slide 23 for details)
- Remove details from notes if we previously captured excessive information

Some changes can only be made by authorised persons. This will apply if:

- We have legitimate consent to record
- Policy has been escalated to a VC or DP Champ or Team Manager)

**REMEMBER TO SAVE
ANY CHANGES**

WORKING EXAMPLES

SCENARIO ONE

Through conversation with customer, you find out customer has experienced a bereavement in their family but does not require us to make any adaptations while going through their application. They are happy for you to make a record of this.

New data field	What you select
Vulnerability identified	Yes – no adaption needed
Who has disclosed	Customer
Source of disclosure	Phone
Basis for processing	Explicit consent
Date flag added and date last updated (auto populate)	Auto - populated
Permanent or temporary	Temporary
Characteristics	Bereavement
Drivers (auto populate)	Life event (auto populate)
Adaption required	No
Review date	Select a date 6 months ahead
How can we adapt	
Signposted to NSN	No
Champion or Manager Referral Needed	N/A
Notes (free text)	Close family member died recently

SCENARIO TWO

Customer has completed their Comentis Wellbeing Questionnaire and report is showing that no vulnerabilities identified. There have been no other signs of vulnerabilities when speaking to customer about their drawdown request.

New data field	What you select
Vulnerability identified	No
Who has disclosed	
Source of disclosure	
Basis for processing	
Date flag added and date	
last updated (auto populate)	
Permanent or temporary	
Characteristics	
Drivers (auto populate)	
Adaption required	
Review date	
How can we adapt	
Signposted to NSN	
Champion or Manager Referral Needed	
Notes (free text)	

SCENARIO THREE

You are speaking to customer but a change of address and ask whether there is anything we should know to support them better through application (disclosure question)

Customer tells you they are moving as have recently had a mini-stroke which has impacted short term memory – so may need things repeated or ideally put in writing after calls.

They ask if you could schedule calls when their son is with them for additional support.

New data field	What you select
Vulnerability identified	Yes – adaption needed
Who has disclosed	Customer
Source of disclosure	Phone call
Basis for processing	Explicit consent
Date flag added and date	Auto populate
last updated (auto populate)	Auto populate
Permanent or temporary	Permanent
Characteristics	Dementia / Cognitive disability or brain injury
Drivers (auto populate)	Life events Health
Adaption required	Always
Review date	
How can we adapt	Appointment - Calls at preferred times Decision making - remembering Third-Party Support
Signposted to NSN	No
Referral needed	No
Notes (free text)	Customer had mini-stroke recently affects short term memory / Schedule appts when son is there to support (key support) Repeat information / send key information in writing after call

SCENARIO FOUR

You are just about to call customer as there is some additional information we need to progress their application.

You can see that there is information on the policy that has migrated over and needs updating.

This is what you can see.

What changes do you need to make to ensure the data meets our new data requirements is up to date and relevant.

New data field	What you see
Vulnerability identified	Yes – no adaption
Who has disclosed	Customer
Source of disclosure	Other
Basis for processing	Consent
Date flag added and date	30/05/2026
last updated (auto populate)	30/05/2025
Permanent or temporary	Permeant
Characteristics	Other circumstance
Drivers (auto populate)	Life events
Adaption required	
Review date	
How can we adapt	
Signposted to NSN	No
Champion or Manager Referral Needed	N/A
Notes (free text)	Customer has erosive osteoarthritis which affects his right elbow and is waiting an operation. He is on 140 types of meds and daily injections. Customer has his operation on 24 August 2026. Does not need us to make any adjustments right now.

SCENARIO FOUR – CONTINUED

On the call the customer says that the stiffness in his arm has been getting worse.

There are some forms that he still needs to complete so we offer to pre-populate as much as possible if they is happy with that.

Customer says that would be very helpful.

We agree to do this whenever possible.

New data field	What you see
Vulnerability identified	Yes – adaption needed
Who has disclosed	Customer
Source of disclosure	Phone
Basis for processing	Consent
Date flag added and date	30/05/2026
last updated (auto populate)	Auto-populate
Permanent or temporary	Permeant
Characteristics	Severe or long-term illness
Drivers (auto populate)	Health (auto-populate)
Adaption required	Always
Review date	
How can we adapt	Adapt process – pre-populate forms
Signposted to NSN	Yes – provided link
Champion or Manager Referral Needed	N/A
Notes (free text)	Customer has erosive osteoarthritis which is currently effecting elbow – operation due in August

**FOR ANY QUESTIONS, PLEASE SPEAK TO
MANPREET THETHI**
