HOW TO RECORD VULNERABILITY FERN

NEW WAY OF CAPTURING DATA ABOUT OUR VULNERABLE CUSTOMERS

In 2019, we introduced vulnerability flags to help us record the support needs of our vulnerable customers. This means customers only need to tell us once, and our teams can respond consistently with the right support.

We're now becoming more outcome-focused and want to use this information to better understand and improve outcomes for customers with characteristics of vulnerability.

Our current fields don't give us the detail we need to do this effectively, so we've refreshed them to make the information more accurate and useful.

The new fields are designed to be simple to use. Most are drop-down options, so capturing the right detail should be quicker and easier — not extra work.

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 how we've **migrated / older data** into new data fields
- Identify your responsibility in keeping vulnerability **data accurate and relevant**
- Work through **practical examples** to show how this applies in real customer conversations

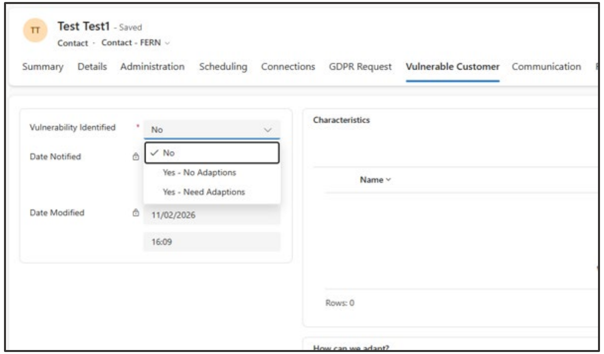
NEW DATA FIELDS AND HOW TO USE

LIST OF NEW DATA FIELDS

- 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)

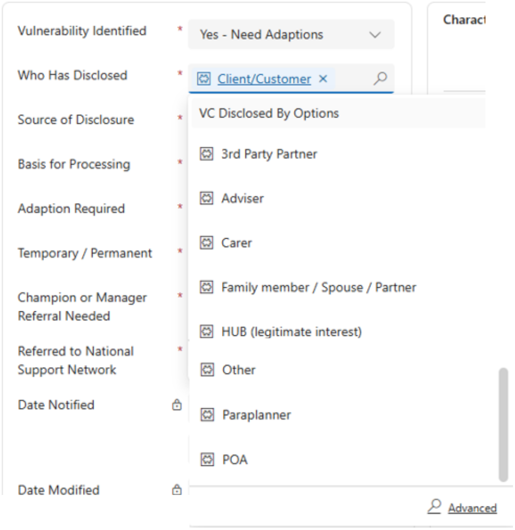
VULNERABILITY IDENTIFIED

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



NO	YES –NO ADAPTION NEEDED	YES –ADAPTION REQUIRED
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**	Use 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 or feel confident to complete the process without us having to do anything different. Agents should continue to actively listen throughout the conversation for any signs that the customer may need additional support. If at any point it becomes clear that the customer would benefit from us adapting our approach, you should update the vulnerability indicator and follow the process for recording adaptions required. For adaptions select ‘No support required’ or ‘Support already in place’	Use 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.** Remember that vulnerability can change over time, so continue to listen carefully for any signs that a customer’s needs may have shifted. If you identify anything that suggests additional support is required, update the vulnerability indicator and record the adaptions needed.

WHO HAS DISCLOSED

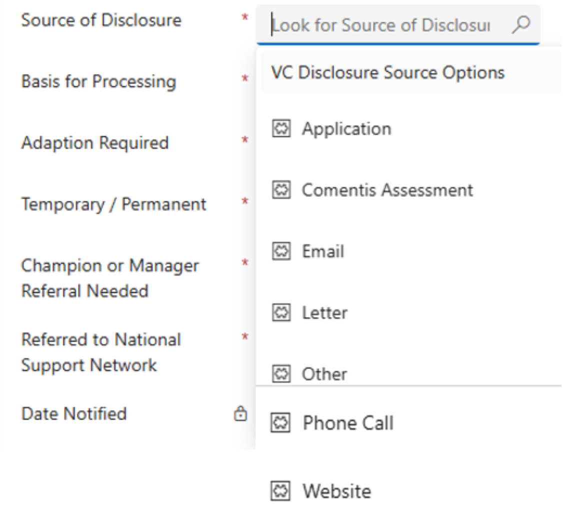


In some situations, we will be told about our customers' support needs from another party, such as an adviser, family member or shared with us by an external agency such as Vulnerability Registration Service

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

If we have used 'legitimate consent' 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)

SOURCE OF DISCLOSURE



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

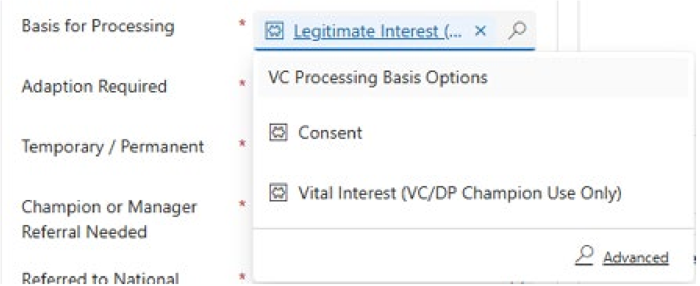
This is the channel where we first found out about the support needs.

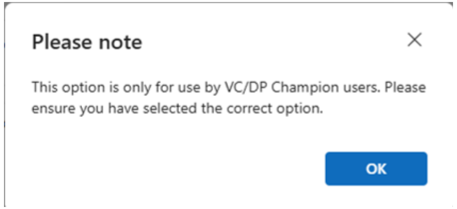
You're able to select multiple options if the customer shares information in a multitude of channels.

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





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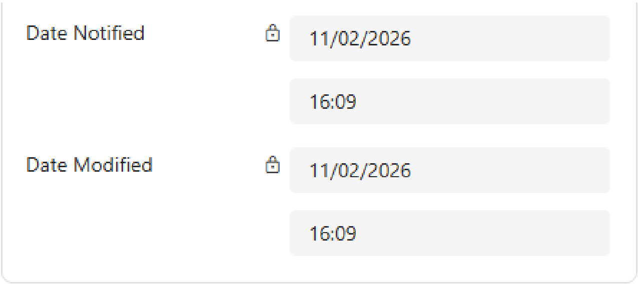
This is your attestation that you have the appropriate level of consent to record our customers' data in a legal way using TEXAS.

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.

DATE FLAG ADDED AND DATE LAST UPDATED

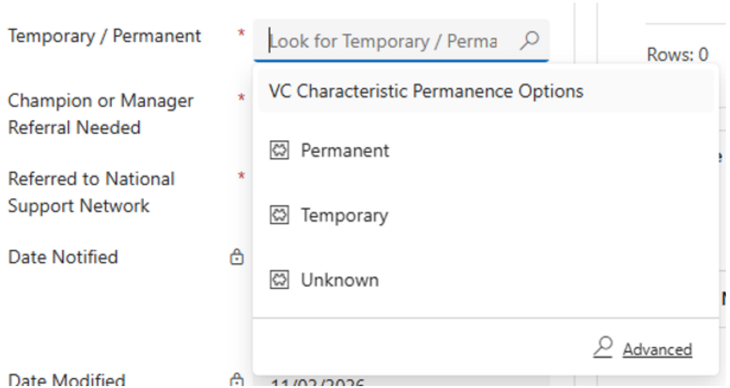


AUTO-POPULATE

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.

PERMANENT OR TEMPORARY CHARACTERISTIC



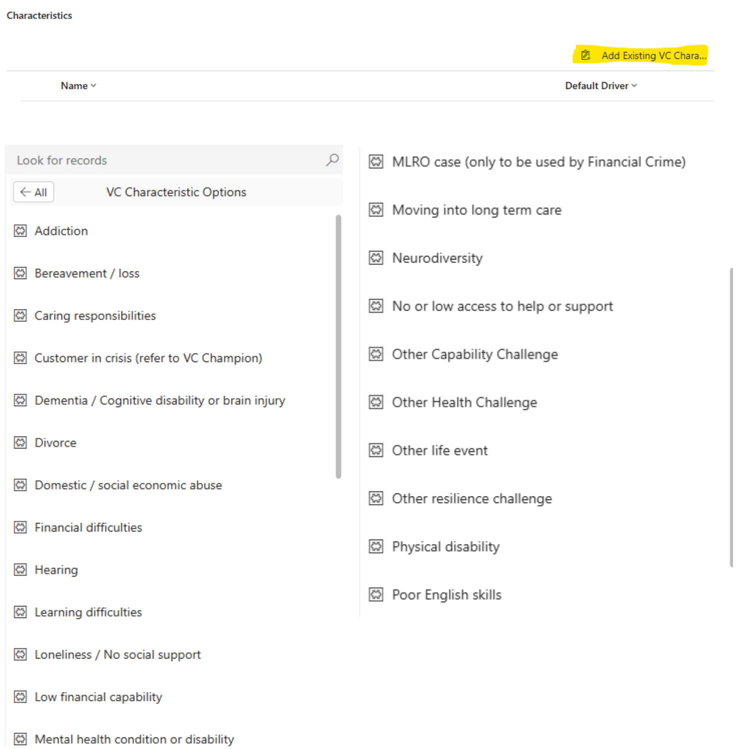
Permanent vulnerability is a long-term or ongoing condition, such as chronic illness, disability or chronic impairment that consistently affect a person's ability to manage daily life or make decisions.

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 **Don’t know**

This is done at a **customer level not characteristic level**. So, if customer has multiple characteristics if any of the characteristics are permanent then record as permanent.

CHARACTERISTICS AND DRIVERS



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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.

See slide 11 for full list of characteristics and corresponding driver

CHARACTERISTICS AND DRIVERS

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

HEALTH
Conditions or illnesses that affect our ability to carry out day to day tasks

LIFE EVENTS
Events such as bereavement, job loss or relationship breakdown

RESILIENCE
Low ability to withstand financial or emotional shocks

CAPABILITY
Low knowledge of financial matters or confidence in managing money

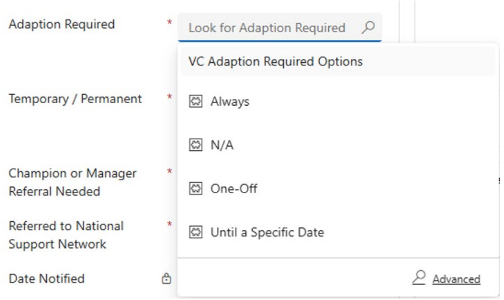
Health
Addiction
Dementia / Cognitive disability or brain injury
Hearing
Mental health condition or disability
Physical disability
Severe or long term illness
Sight
Speech impairements
Other health challenges (add details to notes)

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)

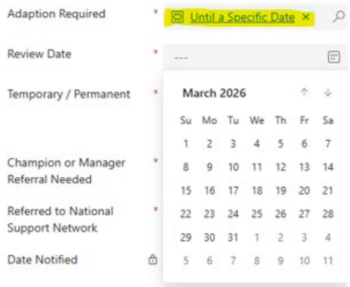
Capability
Learning difficulties
Low financial capability
Neurodiversity
No or low access to help or support
Poor English skills
Poor numeracy or literacy skills
Poor or non-existent digital skills
Other capability challenge (add details to notes)

ADAPTIONS REQUIRED AND REVIEW DATE



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

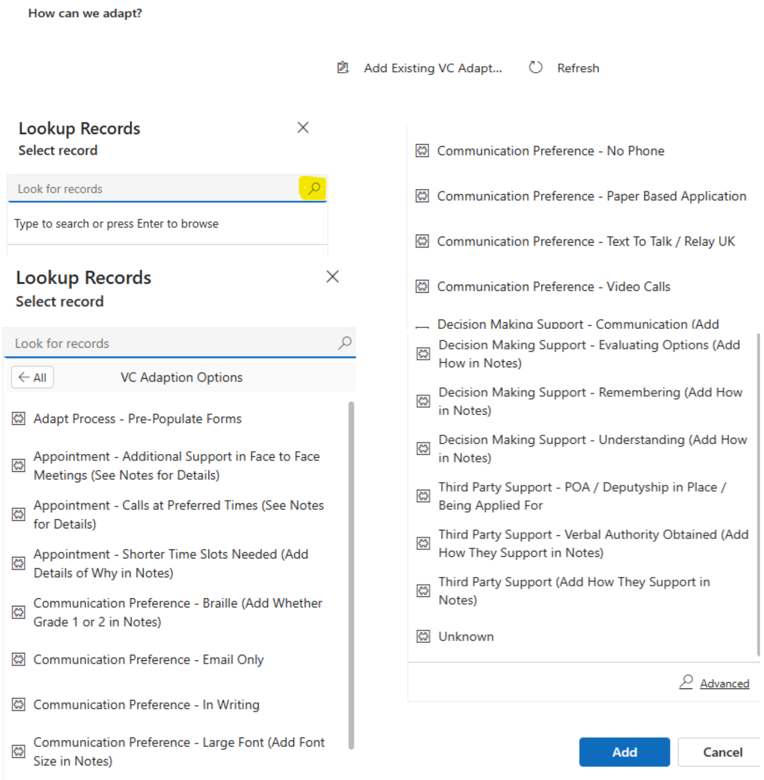
Sometimes vulnerability is intermittent. It can come and go – depending on circumstance. In these instances, select ‘until a specific time’.



This is only required if agent has selected ‘until a specific time’ when asked whether adaptions required.

This date is when it would be appropriate to speak to the customer again about the support, they need from us when interacting.
If it is likely the customer will not need us to adapt for the whole of their application then set the review date for an appropriate time for us to review – based on your conversation with the customer.
If it will be fore the whole time of application, then set review date for 2 years.
It ensures that the data we are holding is relevant and helps us support the customer in the best possible way.

HOW CAN WE ADAPT?



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 14 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

Referred to National Support Network * ---

Until we officially roll out in HUB select 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 portal – 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.

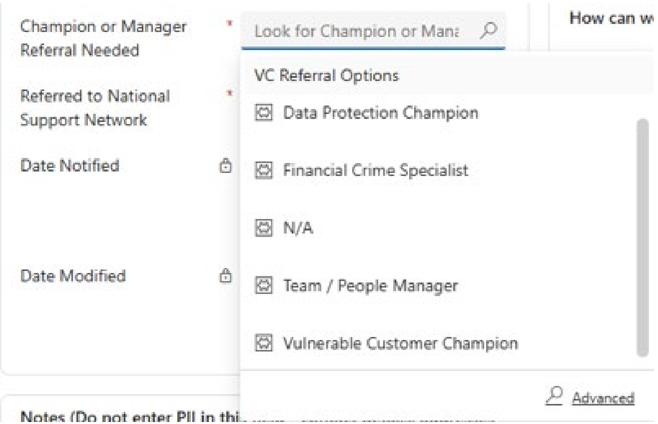
Customers may refuse – and it will be helpful for us to know this. And in other situations, it may not be necessary or appropriate to signpost support.

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.

Find Help Fast | Just Group

REFERRAL NEEDED



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'

***WE ARE IN THE PROCESS OF AGREEING AN ESCALATION PROCESSES**
FOR NOW IF CUSTOMER NEEDS ADDITIONAL SUPPORT SELECT REFER TO TEAM/PEOPLE MANAGER

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.

Notes (Do not enter PII in this field - contact details, addresses or sensitive personal data)

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

VULNERABILITY INDICATOR – DETAILS ALREADY RECORDED

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

1st Applicant

Vulnerable Customer Details

Vulnerable Customer	Test Test1
Vulnerability Identified *	Yes - No Adaptions
Characteristic *	Learning difficulties Hearing
How can we adapt? *	Communication Preference - Braille (Add Whether Grade 1 or 2 in Notes)
Referral *	N/A
NSN Referral *	No
Additional Notes	

2nd Applicant

You can still add and view information for second applicant in the same way you view today

VULNERABILITY INDICATOR – 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)

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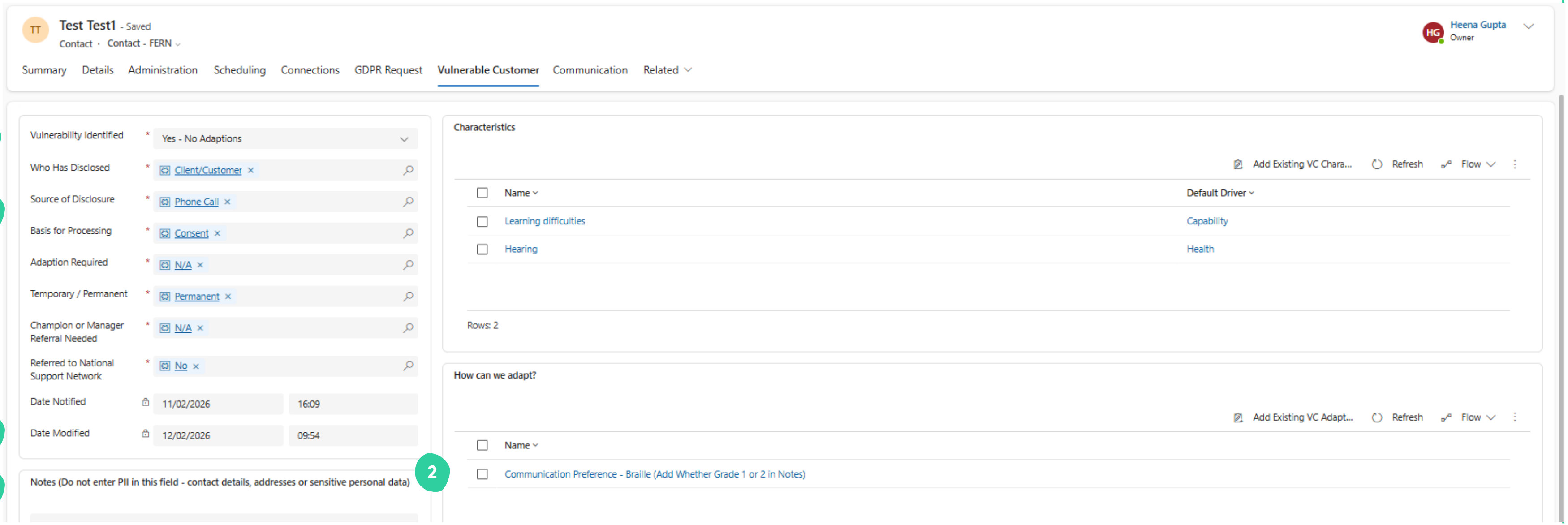
KEY THINGS TO LOOK FOR



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 review date is close / or past, then use IDEA to understand customers current support need
5. If we have noted 'Wellbeing Questionnaire' as source of disclosure you may want to have a look at report
6. Date last updated if this is not current then ensure that data is still accurate and relevant

Can not see review date on this example as support is needed ongoing

KEEPING DATA ACCURATE AND RELEVANT

KEEPING DATA ACCURATE AND RELEVANT

It is important that he information we have recorded for customers is accurate and relevant.

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 Questionnairre
- 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 for 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

UPDATING LEGACY DATA

At the point we created new data fields we had a number of customers flagged as vulnerable an 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.

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

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 adaptions 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	**Auto - populated**
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 2 years 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 through the different appointments with customer.

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 setting up an appointment with a customer and ask whether there is anything we should know to support them better through application (disclosure question) Customer tells you they 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 are also the key carer for their adult son who has learning difficulties so better to schedule calls when the additional support is there with him.

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	Caring 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
Signposted to NSN	No
Referral needed	No
Notes (free text)	Customer had mini-stroke recently affects short term memory / main carer for son Schedule appts when support there for son Repeat information / send key information in writing after call

SCENARIO FOUR

You are just about to call customer for 2nd appointment and want to be prepped to support with any vulnerability needs.
You can see that the customer has already told the Retirement Introducer that they experience anxiety and like to have their sister present on calls when they feel anxious.
We have just received a completed Comentis Questionnaire through and there is some additional information that will be helpful in supporting customer through call.
As well as anxiety the report is also showing customer as mood fluctuations, low concentration and lack of confidence.
You need to update the record.

New data field	What you select
Vulnerability identified	Yes – adaption needed
Who has disclosed	Customer
Source of disclosure	Phone call / Comentis assessment
Basis for processing	Explicit consent
Date flag added and date	**Auto populate**
last updated (auto populate)	**Auto populate**
Permanent or temporary	Permanent
Characteristics	Low emotional resilience Other capability challenge
Drivers (auto populate)	**Resilience / Capability**
Adaption required	Always
Review date	
How can we adapt	Third party - other
Signposted to NSN	No
Champion or Manager Referral Needed	No
Notes (free text)	Sister may take over on call when customer becomes anxious. Comentis report also showing customer may have mood fluctuations, low concentration and lack confidence in finances.