

*Simple Claims Assistance* takes its responsibility towards all our clients very seriously. They are all vulnerable, as they have lost money and are often confused and concerned. There are several situations where this vulnerability is even greater, and clients need even higher levels of care and assistance.

To achieve this extra level of care and assistance, we operate within legal guidelines that aim to protect these extra-vulnerable people, and we follow best practice to ensure we deal with them in a fair, non-discriminatory, ethical way.

This policy outlines how we identify these extra-vulnerable people and the procedures we have put in place for dealing with them.

## Identifying vulnerable people

The Mental Capacity Act 2005 says that a person is unable to make a specific decision if they cannot understand information about the decision to be made, cannot retain that information in their mind, cannot use or weigh up that information as part of the decision-making process, or cannot communicate their decision.

*Simple Claims Assistance* will consider a potential client vulnerable if one or more of the personal situations or personal characteristics listed below are identified during an initial call or home visit.

Characteristics		
Old age	Low income	Inexperience
Low literacy	Learning disabilities	Cultural barriers
Physical disabilities	Mental health issues	English as a second language
Health problems	Location	Being a carer
Lack of internet access	Lone parent	Living alone or in poor living conditions
Situation		
Threat of harm		Victim of crime or accident
Bereavement		Loss of income
Relationship breakdown		Loss of employment
Having recently left care		Threat of deportation
Concern over access to children		Concern over child welfare

## Training

All future employees and representatives of *Simple Claims Assistance* will receive regular training and updates on how to identify and deal with vulnerable people. Training is based on standards of best practice and how to apply them. This includes practical tips on how we talk with vulnerable people on the phone and face-to-face, how we check they have understood conversations and contractual terms, and what we do if they are confused or show distress.

The specific procedures we have in place for identifying and dealing with vulnerable people are shown below and are available for reference on our web site.

1. As soon as a potential client is identified as vulnerable, they are logged onto our CRM (Customer Relationship Management) system with details of their vulnerability and how they wish to be contacted. If their communication needs are due to a medical disability, e.g. they can only be contacted by telephone since they are blind, we give them the opportunity to make a personal declaration about their capabilities and communication needs and record it in our CRM system, taking extra care to process the information as *Sensitive Personal Data* in accordance with the DPA 1998
2. A senior member of staff who is experienced in dealing with vulnerable people is notified and will seek to establish if we can deal with the vulnerable potential client directly. If so, we assign the vulnerable potential client a specific, single point of contact within our company. If we need to seek authority from a carer/third party to deal with the case, then the single point of contact will deal with the carer/third party.
3. We take extra care to ensure that a vulnerable potential client fully understands our *Terms of Business* in order to protect their financial interests. We also ensure that they understand what will happen and what to expect throughout the claims process.
4. If the vulnerable potential client authorises a third party to deal with us on their behalf, we introduce extra security checks to verify the third party's identity and to identify any possibility of fraud and financial abuse.
5. Once we feel happy to proceed with a vulnerable potential client's case, we make every effort to ensure we conduct business in a sympathetic, ethical and professional manner.

For further information, please see:

- Equality Act 2010
- Mental Capacity Act 2005
- Distance Selling and E-Commerce Regulations (DSRs and ECRs)
- DPA 1998
- MOJ Enforcement Standards 2014
- SRA Handbook – Providing Services to People who are Vulnerable 2016
- DMA White Paper 2015 – Guidelines for Call Centres dealing with Vulnerable Consumers

