



Vulnerable People Policy

April 2019 v2

At Money and Me Claims we take our responsibility towards vulnerable consumers very seriously. This means we operate within legal guidelines that aim to protect 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 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.

Money and Me Claims may 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	Physical and learning disabilities	Low literacy
Health problems	Mental health issues	English as a second language

Situation

Bereavement	Victim of crime or accident
Loss of income	Having recently left care

Training

All employees, representatives and Agents of Money and Me Claims receive 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 regularly reviewed by senior management and are detailed in internal documents available for reference by all Money and Me Claims employees, representatives and Agents of Money and Me Claims. Below is an overview:

1. As soon as a Potential Client is identified as vulnerable, they are logged onto our CRM 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 Special Category Personal Data in accordance with the GDPR and DPA 2018
2. A senior member of our Money and Me Claims Management 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; in which case we assign the vulnerable Potential Client a specific a single point of contact within our company; or if we need to seek authority from a carer/trusted third party to deal with the case
3. We take extra care to ensure that a vulnerable Potential Client fully understands our Terms of Engagement 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 practical manner

For further information, please see:

- Equality Act 2010
- Mental Capacity Act 2005
- Distance Selling and E-Commerce Regulations (DSRs and ECRs)
- DMA White Paper 2015 - Guidelines for Call Centres dealing with Vulnerable Consumers Monitoring
- FCA Handbook
- Claims Management: Conduct of Business Sourcebook

It is the responsibility of the Senior Manager to ensure this policy is effective through monitoring, file reviews and complaints procedures.

All staff at Money and Me Claims have a responsibility to read, understand and implement this policy.

All staff should be trained and tested in relation to this Vulnerable People Policy with regular reviews and monitoring which will be recorded.