

Introduction

BJH Windows Ltd (BJH / the Company) has the principle of ensuring good customer outcomes at the heart of everything we do.

The Company understands the important role we play in ensuring vulnerable customers are treated appropriately and aims to ensure that all customers achieve good outcomes when interacting with the Company.

The Company is regulated by the Financial Conduct Authority (FCA) and takes steps to ensure compliance with relevant FCA Rules & Guidance on Vulnerable Customers.

Definition

BJH work to the FCA definition of vulnerable customers:

“A vulnerable customer is someone who, due to their personal circumstances, is especially susceptible to harm - particularly when a firm is not acting with appropriate levels of care”

The Company also understands that vulnerability is not “fixed” and that everyone is at risk of becoming vulnerable or being vulnerable at certain times / points in their lives.

However, there are certain characteristics which make an individual at increased risk of vulnerability.

The FCA has set out clear rules and guidance on the requirements and actions firms are expected to take.

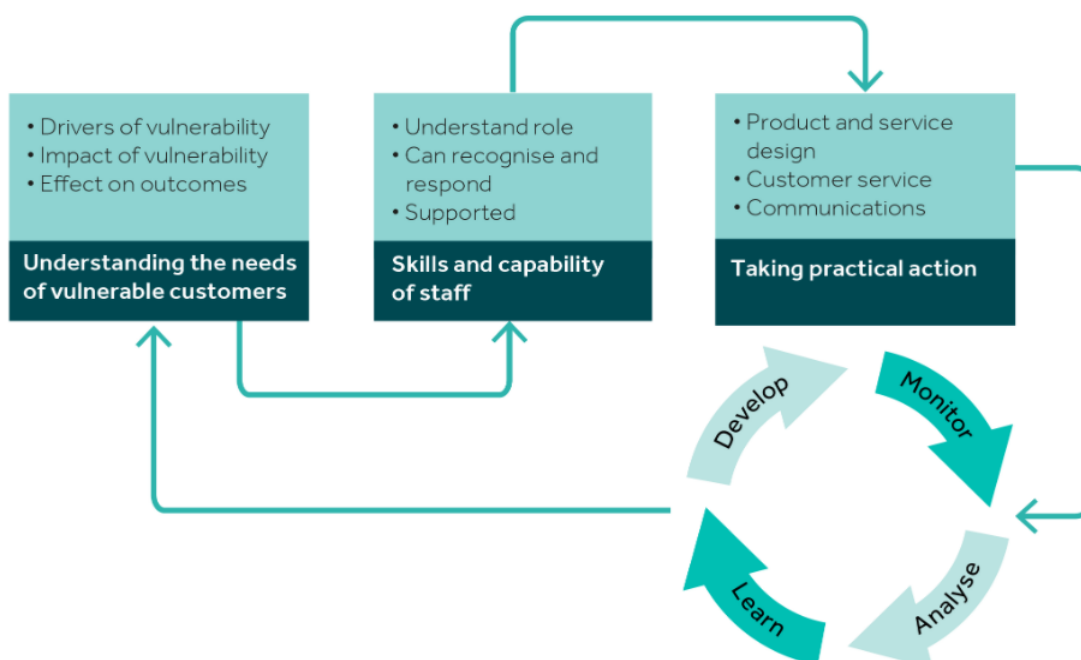


Figure 1. Vulnerability Guidance Infographic. FCA - FG21 Guidance for firms on the fair treatment of vulnerable customers. Full version available here: <https://www.fca.org.uk/publication/finalised-guidance/vulnerability-guidance-infographic.pdf>

Drivers and Characteristics

All customers are at risk of becoming vulnerable and this risk is increased by characteristics of vulnerability related to 4 key drivers:

1. **Health:** Health conditions or illnesses that can affect ability to carry our day-to-day tasks
2. **Life Events:** Such as bereavement, loss of job or relationship breakdown
3. **Resilience:** Low ability to withstand financial shocks
4. **Capability:** Low knowledge of financial matters or confidence managing money (financial capability). Low capability in other areas such as literacy or digital skills

The below table, from the 2021 FCA Final Guidance, illustrates specific characteristics of vulnerability and their drivers:

Health	Life events	Resilience	Capability
Physical disability	Retirement	Inadequate (outgoings exceed income) or erratic income	Low knowledge or confidence in managing finances
Severe or long-term illness	Bereavement	Over- indebtedness	Poor literacy or numeracy skills
Hearing or visual impairment	Income Shock	Low savings	Poor English language skills
Mental health condition or disability	Relationship Breakdown	Low emotional resilience	Poor or non-existent digital skills
Addiction	Domestic abuse (including economic control)		Learning difficulties
Low mental capacity or cognitive disability	Caring responsibilities		No or low access to help or support
	Other circumstances that affect people's experience of financial services eg, leaving care, migration or seeking asylum, human trafficking or modern slavery, convictions		

Table 1. Characteristics associated with the 4 drivers of vulnerability. FCA - FG21 Guidance for firms on the fair treatment of vulnerable customers.

Vulnerable Customers & Our Services – Credit broking

Whilst our target market is not inherently vulnerable, we recognise there are certain circumstances which may lead customers in vulnerable circumstances to us and our services. For example, customers may:

- Struggle to understand or retain information presented to them;
- Have affordability or debt issues; or
- Have mental health or capacity issues.

Not all customers who have these characteristics will experience harm. But they may be more likely to have additional or different needs which, if we do not meet them, could limit their ability to make decisions, putting them at greater risk of harm. So, the level of care that is appropriate for these consumers may be different from that for others.

Mental Health and Capacity

- **'Mental Capacity'** is a person's ability to make an informed decision at a specific point in time.
- A **'Mental Capacity Limitation'** is where a person cannot make such an informed decision due to 'impairment or disturbance in the mind or brain'. This potentially includes customers with mental health (or other) conditions.

BJH takes additional steps to ensure appropriate handling of individuals with the above issues / limitations. Those interacting with customers / applicants have undergone training to ensure they are able to identify and meet the needs of vulnerable customers.

Risks

An assessment of the risks posed to vulnerable customers has been completed. These risks are detailed below. Further information on how to we handle / mitigate these risks is detailed in the below vulnerable customer treatment process.

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Vulnerable Customer Treatment Principles

It is essential all customer facing staff and management understand these risks and how their role can potentially have a negative impact on vulnerable customers.

In all our interactions with vulnerable customers we must:

Listen to the customer - Discuss the information they provide and treat them appropriately if we assess that they are vulnerable.

Pay attention to customer communications - This may also be in person, by writing in letter or email.

Treat people as an individual – No two people are the same. We may commit to treating all of our customers fairly but staff should be sensitive to dealing with each person as an individual and listening to them on that basis.

Take time to listen – Listen carefully to each person and the detail of their particular circumstances;

Be aware – What is the customer saying and how they are saying it i.e. pitch, tone, are there signs of agitation? Do you hear signs that the customer has not understood, is confused or is repeating questions? Has the customer mentioned medication? If you are at the customer's home, are there signs or indicators of vulnerability. For example, has the house been adapted, is a carer present?

Encourage disclosure – Encourage the customer to give you further information on anything that you have become aware of. Explain to the customer how the information may be used to provide them with support. Explain that you will record the information and share it with your client and obtain their consent for that.

Provide a tailored response – Any customer, especially one who is vulnerable, will not be helped by being given a 'standard' response. After listening to what the customer has to say, staff should give a considered response based on what they have heard.

Refer onto someone with authority and discretion – Pass the details onto the lender and / or any third parties who you may feel may be able to assist e.g. Citizens' Advice – Refer to Signposting document

Record - Flag the account as vulnerable.

In the event that you need support, you should refer to the Vulnerable Customer Specialist.

Vulnerable Customer Treatment Process

In addition to the above treatment principles, we have identified specific likely scenarios and handling approaches. The support required will of course depend on the individual customer and their circumstances. Solutions may include those illustrated below. However, this list is not exhaustive, and guidance should be sought from the Director if needed.

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Stage 1 - Identification and Disclosure

Customers may disclose vulnerability issues, or we may identify them during our interactions. In all cases we must ensure information relating to vulnerability is captured and treated compliantly and in a way which supports good customer outcomes. We use the TEXAS model to ensure a consistent compliant approach. It helps ensure staff record the most relevant information about characteristics of vulnerability, how these characteristics affect support needs, while helping to meet data protection requirements.

The steps of the model include:

Thanking the customer for their disclosure.

Explaining how their disclosed information will be used.

eXPLICIT consent is sought

Asking the customer questions to find out key information to understand the situation better.

Signpost to internal support, or to external services with specialised expertise (where this is appropriate).

Only once this model has been used and consent gained will information be stored on our system. Information recorded must be adequate to enable future reviewers of the system to quickly identify the vulnerability issues and how they impact the customer

Stage 2 - Handling & Additional Support

Where vulnerability issues are identified the customer's case / application must be referred to the Director to ensure the appropriate additional support measures are taken.

Our Vulnerable Customer Policy identifies certain capacity issues and risks and suggests mitigating actions - the Vulnerable Customer Specialist will advise the team member on the right course of action depending on the nature of the concern, following the instructions from the said policy (e.g. asking the customer who doesn't speak English very well to instruct a competent person to act as interpreter).

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The support required will of course depend on the individual customer and their circumstances. Solutions may include:

Issue	Indicators	Risk	Mitigation/ Approach
<p>Understanding. Possibly as result of a limitation/ disability</p>	<ul style="list-style-type: none"> Do you hear signs that the customer has not understood, is confused or is repeating questions? Has the customer mentioned medication or health issues? Can the customer repeat back/ engage in conversation about the products being discussed 	<p>Some documents and information can appear complex. There is a risk the customers do not understand the documents/ information presented to them or the nature of the finance agreement.</p>	<ul style="list-style-type: none"> Applications managed using CCS application software. Customer to instruct a competent person to act as interpreter. If the interpreter is not a professional but a family member, he or she will have to go on the application as a joint hirer. Customer to nominate a reasonable communication medium suitable for their disability Allocating additional time for appointments/ calls Spreading the process over several shorter appointments
<p>Language Barriers</p>	<ul style="list-style-type: none"> Customer is not able to hold a conversation in English Customer requests information is sent/ relayed to a 3rd party Do you hear signs that the customer has not understood, is confused or is repeating questions? Can the customer repeat back/ engage in conversation about the products being discussed 	<p>Customer cannot fully understand important features of their agreement with us, the finance company, their recommendation or the consequences of that recommendation</p>	<ul style="list-style-type: none"> Applications managed using CCS application software. Customer to instruct a competent person to act as interpreter. If the interpreter is not a professional (e.g. a family member) he or she will have to go on the application as a joint hirer.

<p>Communication Barriers</p>	<ul style="list-style-type: none"> • Customer is deaf/ hard of hearing. • Customer unable to use website due to lack of access to internet/ technology or other limitation 	<p>Customer cannot communicate using a certain method e.g. phone</p>	<ul style="list-style-type: none"> • Applications managed using CCS application software. • Offer an alternate communication method e.g. email (ensuring adequate records of all communications are retained) or in person with an interpreter.
<p>Mental incapacity (temporary) e.g. intoxication</p>	<ul style="list-style-type: none"> • Do you hear signs that the customer has not understood, is confused or is repeating questions? • Is the customer slurring words? • Can the customer repeat back/ engage in conversation about the products being discussed • Has the customer mentioned medication/ drugs / alcohol 	<p>As above plus the potential for disregard for consequence</p>	<ul style="list-style-type: none"> • Applications managed using CCS application software. • Agreement must be reached outside of any period of incapacity. • Customer should be encouraged to seek independent professional advice. • If legal agreement cannot be reached outside of any incapacity, client must provide "Power of Attorney" for a competent individual to act on their behalf.
<p>Mental incapacity (Permanent)</p>	<ul style="list-style-type: none"> • Do you hear signs that the customer has not understood, is confused or is repeating questions? • Has the customer mentioned medication, health issues or a specific condition? • Can the customer repeat back/ engage in conversation about the products being discussed 	<p>As above plus the possibility that any agreement might be unenforceable as a result of known incapacity.</p>	<ul style="list-style-type: none"> • Applications managed using CCS application software. • Customer must provide "Power of Attorney" to a competent individual to act on their behalf
<p>Affordability/ Debt</p>	<ul style="list-style-type: none"> • Has the customer referred to debt problems or worries about wider financial situation? 	<p>Customer cannot afford to service the agreement on an ongoing basis</p>	<ul style="list-style-type: none"> • Applications managed using CCS application software where Affordability & Creditworthiness assessments completed.

	<ul style="list-style-type: none">• References to issues obtaining credit elsewhere		<ul style="list-style-type: none">• Only customers with affordability in line with lenders criteria are accepted.
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Colleagues should make use of the **IDEA** and/ or **Bruce Protocol** to establish severity and duration of condition/ issues.

The individual handling the application will consult the **Director** throughout the whole process of dealing with the customer so that the team can assess the situation together and see if they are satisfied that recommended actions produced the desired result.

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Before the customer commits to any agreement, a final assessment will be made. We will determine whether they believe the customer is able to understand information presented to them and make an informed decision.

Additional Processes in Place to Ensure Good Outcomes for Vulnerable Customers

The various methods for customers to contact us are clearly visible on all communications and our website and provide a choice of ways to communicate with us,

- Post
- Email
- Face to Face
- Telephone

All our communications verbally or written material is reviewed prior to issue to ensure it is clear, to the point and jargon free.

Where we feel it is needed, additional time is provided between the sales call, written follow up and contractual agreement to allow the customer time to communicate with a third-party and understand the content of the product/service offered.

Where applicable, we try our best to ensure the products/services that we offer are flexible and made to suit the customers' needs and requirements and where possible deal with the customer's authorised third-party in a helpful and transparent manner.

All sales visits are followed up with a telephone call and in writing and the benefits and consequences of any product/service are fully explained along with any legal implications.

We ensure that all of our customers do not make a purchase with us or enter into a credit agreement with one of our lender partners without fully understanding what they are entering in to.

When presenting finance options to our customers we do so using our electronic choice of funding software (eCOF) which describes the products clearly and displays the breakdown of each product to the customer. A copy of the bespoke choice of funding is the emailed directly to the customer. Staff also talk through this with customers and explain verbally the information which has been emailed to them.

If we believe that the customer is not fully aware of what they are entering in to then we will:

- Not continue with the sale of any products or services.





- Not continue with any application for credit to fund a purchase.
- Ask if a friend or family member is available to assist the customer, or we will arrange a follow-up appointment when a friend or family member is available.
- Provide the customer with all relevant information in a clear, fair and not misleading manner, allowing them to make an informed decision.
- Not refuse to deal with an individual due to their vulnerability. Instead, we will work with them to ensure they achieve a good outcome.
- Not label different demographics or individuals as vulnerable without understanding their situation. We accept that no two people are the same and each individual should be handled on a case-by-case basis.
- Where appropriate, we may also signpost customers to agencies such as Citizens Advice to seek further guidance and support.

Training

All customer facing team members must complete Fair Treatment of Vulnerable Customers training prior to starting in their role and on a routine basis to ensure they are aware of correct and up to date techniques and procedures. All customer facing staff will receive the below training to ensure they understand this, and are suitably qualified to identify and ensure good outcomes for vulnerable customers:

1. Review and confirmation of understanding of Vulnerable Customer Policy.
2. Completion of Fair Treatment of Vulnerable Customers training provided by our compliance support firm, Go Comply Ltd.
3. Completion of additional online training and assessment on Fair Treatment of Vulnerable Customers provided by RB Compliance Ltd.
4. The Vulnerable Customer Specialist is Oscar Hamilton and has training to ensure the team are fully supported in this area.

Appendix 1 – Vulnerable Customer Identification & Handling Models

<p>SPIDER Advise bad news and actions clearly with minimal distress.</p>  <ul style="list-style-type: none"> • Set the scene: "Thanks for getting in touch. It's important we talk about..." • Perspective: "I want to understand your perspective. How are you feeling and what options are you considering?" • Invitation: invite questions. "Are you able to talk this through today?" Do they need the info in a different format or to talk another time?" • Deliver: use simple, bite-sized, jargon-free language. Allow it to 'sink in'. "I'm sorry, this news might be disappointing. I'll explain and we'll talk options..." • Empathise: listen carefully with empathy, giving space for them to express feelings. • Recap: summarise and recap to check understanding. Are they ready to make a new decision or take action? If not, rearrange and offer lots of reassurance. <p>www.wiseradviser.org/vulnerability</p>	<p>BRUCE For clients experiencing a mental capacity limitation.</p>  <ul style="list-style-type: none"> • Behaviour: look for clues of a limitation in the client's behaviour and speech. • Remembering: if they are struggling to remember the repeat advice. Ask what might help, write it down or see if someone can help them. • Understanding: ask them to summarise their understanding. Fill any gaps by repeating advice or using different explanations by simplifying or rephrasing. • Communication: how would they prefer to communicate? Try to accommodate this. Allow enough time and pause regularly. • Evaluation: (or weighing-up) – discuss each option simply, writing down any pros and cons. Does anyone usually support them? <p>www.wiseradviser.org/vulnerability</p>	<p>IDEA Talking to a client about their vulnerability.</p>  <ul style="list-style-type: none"> • Impact: what are they finding hard? "What has the impact been on your personal and financial situation?" • Duration: how long has the client been living with the vulnerability? "So when did this first start to happen?" • Experiences: how is the client experiencing this vulnerability? Is it something that fluctuates? "Have you experienced this before?" • Assistance: "Is there anything else we should know about any support, treatment or care you're receiving? It could help us to support you better." <p>www.wiseradviser.org/vulnerability</p>	<p>TEXAS When your client tells you about themselves.</p>  <ul style="list-style-type: none"> • Thank them: "Thanks for telling me, it will help us advise you better." • Explain: "We'll use information you share to tailor the advice. We'd like to make notes in our database so we can look at them next time we advise you. We won't share your information with anyone outside our organisation." • Explicit consent: "Are you happy to give me permission to note down and save the information you've shared with me today?" • Ask: "Does your situation make it harder for you to manage your money or communicate with us? Do you have any help, for example from a relative?" • Signpost: refer to the most appropriate internal or external help. <p>www.wiseradviser.org/vulnerability</p>
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GUIDELINES

Key legislation and guidelines.



- **Mental Capacity Act 2005:** use BRUCE and CARE to help you identify and support clients who may have capacity limitations.
- **Data Protection Act 1998:** use TEXAS and RECORD to help you identify, record and store information in line with the Act.
- **Human Rights Act 1998:** everyone has fundamental human rights, e.g. Article 14 - the right not to be discriminated against.
- **The Equality Act 2010:** protects people from discrimination.
- **Financial Conduct Authority Consumer Credit sourcebook (CONC):** useful guidelines include: CONC 2.10 and 7.10.
- **MALG Guidelines:** mental health and debt (including guidance for processing data and the Debt and Mental Health Evidence Form).
- **New Standards of Lending Practice:** guidance on treating vulnerable customers fairly, positively and sympathetically.

www.wiseradviser.org/vulnerability

CRISIS

Ways to support a client in crisis, and yourself.



- **Calm:** be calm and take appropriate action.
- **Listen:** to a concerned third party. Check if the client is available. If not, don't share data, note their observations, explain your plan and take action.
- **Acknowledge:** refer to BRUCE, SPIDER or BLAKE cards for support.
- **Ask:** for support, debrief and take time out if you feel upset or worried.
- **Protect:** anyone in an abuse situation must be taken seriously, given support and referred to those who can protect them.
- **Signpost:** or refer to those who can help, e.g.
 - Samaritans (116 123) for suicidal or despairing people 24 hours
 - NHS 111 (dial 111) for more help with a mental or physical health concern
 - Rethink Mental Illness (0300 5000 927)
 - Mind (0300 123 3393) weekdays

www.wiseradviser.org/vulnerability

RED FLAGS

Vulnerability indicators to look out for.



- **Potentially vulnerable:** signs include a difficulty, distress, or life events that might lead to a vulnerable situation.
- **Vulnerable:** more likely to experience harm, loss or disadvantage compared to others.
- **Particularly vulnerable:** heightened or imminent risk of detriment (a more serious or negative impact). Offer support quickly to avoid significant harm.
- **Individual factors:** illness, disability, contact with health or social care workers and getting certain benefits (like PIP).
- **Wider circumstances:** excessive or unusual expenditure, life events (e.g. bereavement), or income shocks (e.g. unemployment).
- **Organisational actions:** something 'has been done' causing difficulty (e.g. a change in communication method), or things that 'haven't been done' (like no consideration of a third party trying to help).

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BLAKE

If your client mentions taking their own life.



- **Breathe (to focus):** it can be hard to hear. Take a moment and acknowledge them, 'I'm so sorry to hear you feel that way. How can we help?'
- **Listen (to understand):** always take what they've shared seriously. Listen carefully, is there an imminent risk of harm?
- **Ask (to discover):** Generally 'What has led to these feelings?', 'Have you had any help?' or direct 'Do you have a plan?', 'Where are you now?', 'Are you alone (is there anyone there who can help?)'
- **Keep safe (from harm):** contact emergency services if someone is at risk of harm. Express concern: 'I'm worried about what you've told me - what can we do to help and keep you safe?'
- **End (with summary):** and make notes. 'Before we finish let's recap and talk about what's next...'

www.wiseradviser.org/vulnerability

Appendix 2 – Signposting Information

- **Money Advice Service** <http://www.moneyadviceservice.org.uk/en/tools/debt-advicelocator>
- **Citizens Advice** For advice and information on debt and other topics, visit your local Citizens Advice (address in the phone book) or go to www.citizensadvice.org.uk.
- **Citizens Advice Northern Ireland** If you live in Northern Ireland, phone 0800 028 1881, email debt.advice@citizensadvice.co.uk or visit www.citizensadvice.co.uk for debt advice.
- **Citizens Advice Wales** If you live in Wales, you can call Adviceline on 0300 330 1313 if you want to speak to someone about your debts. Calls cost 12p per minute from a landline, and from 3p to 45p from a mobile or visit www.citizensadvice.org.uk/wales/debt-andmoney/help-with-debt/get-help-with-your-debts/get-help-with-your-debts.
- **StepChange Debt Charity** For debt advice throughout the UK phone 0800 138 1111 or visit www.stepchange.org.
- **Other useful organisations** Civil Legal Advice You may get legal aid if your home is at risk. Check at www.gov.uk/civil-legal-advice or phone 0845 345 4345.
- **Samaritans** (116 123) for suicidal or despairing people 24 hours
- **NHS 111** (dial 111) for more help with a mental or physical health concern
- **Rethink Mental Illness** (0300 5000 927)
- **Mind** (0300 123 3393) weekdays. <https://www.mind.org.uk>
- **GamCare** is the leading UK provider of free information, advice and support for anyone affected by gambling harms. 0800 8020 133. <https://www.gamcare.org.uk/>
- **Drinkaware**. Alcohol Addiction. <https://www.drinkaware.co.uk/>
- **Drug use**. 0300 1236600. <https://www.talktofrank.com/>
- **Age UK**. Information and advice on legal issues, including making a will, what to do when someone dies and choosing a power of attorney. <https://www.ageuk.org.uk/>