



Vulnerable Persons Policy

ANDREW D'AURIA SOLUTIONS LIMITED has established clear and effective policies and procedures for identifying and dealing with vulnerable customers. These are first of all identified through the underwriting process.

Protecting vulnerable consumers is a key priority for us. We want vulnerable consumers to experience outcomes that are as good as those for other consumers. The fair treatment of vulnerable consumers is embedded into our culture, policies and processes throughout the whole consumer journey.

With vulnerable consumers, there are factors that limit their ability to make reasonable decisions and choices. So, the level of care that is appropriate for these consumers will be different from that for others.

This firm does NOT charge upfront fees for any customer it considers vulnerable where credit or mortgage related work is involved. The firm does NOT charge upfront fees for any credit broking related work.

All staff, whether customer facing or not undergo training on vulnerable clients, by passing the relevant test set on BAT.

We have identified 4 key drivers which may increase the risk of consumer vulnerability:

- **Health: health conditions or illnesses that affect the ability to carry out day-to-day tasks**
- **Life events: major life events such as bereavement, job loss or relationship breakdown**
- **Resilience: low ability to withstand emotional or financial shocks**
- **Capability: low knowledge of financial matters or low confidence in managing money (financial capability). Low capability in other relevant areas such as literacy or digital skills**

Generally, a person is considered to be vulnerable if it would be unreasonable to expect them to be able to deal with a problem themselves. There is no legal definition of a vulnerable person, but the National Standards for taking control of goods says this could include:

- older people
- disabled people
- the seriously ill
- the recently bereaved
- single parent families
- pregnant women
- unemployed people



- those who have obvious difficulty in understanding, speaking or reading English.
- people with mental health issues.

This is also likely to include people recovering from Covid.

This firm have also measures to distinguish between **actually vulnerable** and **potentially vulnerable** customers. There are three groups of people, the above two sections, plus the non-vulnerable. The firm will assess all customers into one of these three groups, when taking them on board, and this information will remain on the customer file for auditing purposes.

Under TCF outcome 6, staff must ensure that vulnerable clients are not presented with barriers preventing them from obtaining advice and transacting business. Staff should take appropriate steps to assist vulnerable clients. This may include:

1. Recommend that they are accompanied at interviews
2. Conduct more meetings than usual to ensure understanding is fully confirmed and demonstrate appropriate care of this type of client
3. Provide documentation in bigger print or change the style of correspondence to suit the understanding of the client (Braille, larger print etc)
4. Provide them with advice to seek further help.
5. Refer them to a debt agency such as Citizens Advice Bureau
<http://www.adviceguide.org.uk>