



Absolute Sense Independent Financial Advisers Ltd

Vulnerable Client Policy

1.0 Policy Statement

This policy sets out how we aim to identify and treat clients and prospective clients who may be considered as being vulnerable by virtue of their age, disability or circumstances.

Although vulnerability can come in many forms, it is important that such individuals are dealt with appropriately, fairly and consistently.

We are committed to making sure that we treat any vulnerable client as an individual. We will do this by being:

- Flexible in our approach to client communications
- Empathetic to any specific needs or concerns they have

We will provide training all our staff to identify the key indicators of vulnerability and providing appropriate support and solutions for vulnerable clients

2.0 Reviewing this policy

To ensure this policy continues to accurately reflect the process we will review this policy on a Annual basis.

Any updated policy that includes material changes will be distributed to all individuals within the business.

3.0 What is a vulnerable client?

The FCA defines a vulnerable client as: 'Someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when a firm is not acting with appropriate levels of care'.

We are mindful that many clients in vulnerable situations may not think of themselves as being 'vulnerable'.

4.0 Types of vulnerability

There are a number of factors that could result in a client being deemed vulnerable on a temporary, sporadic or temporary basis.

A vulnerable client could be considered to be anyone who by virtue of their health, age or circumstances may be less able than others to:

- Realistically and objectively identify and prioritise their own needs
- Fully understand the risk, cost or implications of any advice provided
- Assess information in the usual format, for example, orally during meetings or visually in respect of written advice

5.0 Factfinding vulnerability

We would consider individuals affected by the following factors to potentially be vulnerable in the following scenarios:

- Low literacy, numeracy and financial capability skills
- Physical disability
- Severe or long-term illness

- Mental health problems
- Low income and/or debt
- Caring responsibilities (including operating a power of attorney)
- Being 'older old' (for example over 80) although this is not absolute – this could be associated with cognitive or dexterity impairment, sensory impairments such as hearing or sight, onset of ill-health, not being comfortable with technology)
- Being young (associated with less experience)
- Lack of English language skills
- Not possessing standard documents or credit history (for example armed forces personnel returning from abroad, ex-offenders, care-home leavers).

The presence of one or more of the above factors does not necessarily mean that the client is vulnerable. Each adviser will need to assess their client's personal circumstances and ensure that every client is treated individually and with respect and empathy.

There may also be a change in the client's circumstance that would make the client potentially vulnerable, such as divorce, or redundancy. In most cases any change in circumstance is unlikely to result in the client being vulnerable but the role of the professional adviser is to identify those rare occasions when the client is likely to be vulnerable and tailor the advice needs accordingly.

Any concerns around the assessment of clients should be referred as follows:

1st Instance Administration Team Lead

2nd Instance Company Director

6.0 Identifying a vulnerable client

To be in a position to identify if an existing or potential client falls within our definition of a vulnerable client, we would expect this to be explored during the factfinding stage.

There should be detailed meeting notes which demonstrate that the client's motives have been fully explored in a sensitive manner and that this is an early opportunity to reinforce the benefits of involving additional individuals to help with any decision making process.

If we identify a client as being vulnerable, we will treat them in line with the steps noted below under the heading 'Dealing with a vulnerable client'.

7.0 Dealing with a vulnerable client

We will make sure that in all cases, a client has the capacity to understand the advice they are being given. If they don't and there is no attorney or deputy in place, the advice process is unlikely to be able to proceed.

If we identify a potential client as being vulnerable, we will:

Vulnerability	Points to consider
All types	<ul style="list-style-type: none"> • We will invite the client to have a family member or third party accompany them to meetings or participate in phone calls/web meetings. • We will consider separate meetings with the client if we feel that they are being pressured by a separate individual, or family member.

	<ul style="list-style-type: none"> • We will encourage staff to signpost vulnerable clients to relevant organisations (for example, StepChange, Money Advice Service, Citizen’s Advice, etc.) • We will consider the length of meeting, the format and the location to suit the specific needs of the individual. Clearly different vulnerabilities have different needs. • We will offer home appointments, and outside of office hours where appropriate to do so. • We will tailor the method of communication to the individual so that they have the best chance of understanding the information provided. • We will give the opportunity to have a further meeting if the client is not sure of the information provided. • We will liaise with any Deputies, or Attorneys but also encourage the clients to be included in any decision making as much as possible and communicate in a manner which we consider appropriate to achieve the best understanding for the individual.
Physical disabilities	<ul style="list-style-type: none"> • We will discuss alternative options for communicating information which suits any physical disabilities. We do not consider there to be a ‘one-size fits all approach here’ as many individuals wish to retain independence.
Where English is not the client’s first language	<ul style="list-style-type: none"> • Individuals will be encouraged to seek an interpreter, where possible.
Not being computer literate	<ul style="list-style-type: none"> • We will look at options to minimise the use of technology to deliver our service and discuss this with the clients.

8.0 Data Protection

As part of delivering financial services to vulnerable clients, we will gather detailed information from them, especially about their physical and/or mental health. This information will be dealt with in accordance with our data protection policy.

9.0 Training

We will make all staff aware of this policy when they join our firm and they will sign to confirm that they have reviewed this policy.

All staff will also be given training on dealing with vulnerable clients upon joining as part of their Training and Competence arrangement.

This training will include online tests and study modules on the subject of vulnerability. More importantly it will include ‘talk me through’ type activities to share experiences within the business.

The Training and Competence in this area will develop over time and staff will be actively encouraged to develop their CPD on this area.

