

Tips for identifying consumers in vulnerable circumstances

User Guide

This document provides a short, easy to digest set of tips for firms thinking about how they identify consumers in vulnerable circumstances.

It is particularly useful for firms looking to improve existing identification strategies and/or bring new ones into practice. These tips are based on existing research and best practice within this area.

This user guide is based on insights drawn from a literature review commissioned by the UKRN on 'the challenge of identifying vulnerability'. For more information please visit: https://www.ukrn.org.uk/?post_type=publications&p=1785&preview=true



Encourage self-disclosure where possible

- **Giving every consumer the opportunity** to self-disclose is one of the simplest and most commonly used methods of identification, but there are many barriers as to why an individual may not do this. Soft-skilling frontline staff to navigate difficult conversations can help encourage disclosure.
 - o Empowering, training and 'soft skilling' frontline staff to facilitate more open and flexible conversations with consumers can encourage self-disclosure. Open conversations can also lead to consumers self-disclosing other vulnerabilities that may have been missed out by more formulaic questioning.
 - o For a useful conversation guide see page 21 on the ['Texas Drill'](#).

- **Whilst offering multiple ways to get in touch** to disclose and discuss vulnerabilities is important, firms should make the most of the unique opportunities for self-disclosure presented during face-to-face contact with consumers.
 - o One approach is providing 'Direct Application Support' for self-disclosure. This involves representatives from a firm directly assisting consumers to complete self-disclosure forms and submit evidence for their application. It is best coupled with routine home visits to consumers e.g. utilities companies conducting home gas or electricity inspections.
 - o For more information about direct application support [see pages 39-40](#).



Don't just rely on self-disclosure - consider putting into place proactive identification strategies.

- **Look for 'red flags':** these are indicators of difficulty, distress, or life events and wider circumstances that could highlight an underlying vulnerable situation. These might be detected in 'unusual' consumer habits or sudden changes in behavioral patterns and activities outside the norm for the consumer.
 - o The 'BRUCE Protocol' is an approach used for training frontline staff to recognize behavioural cues and (vocal) indicators of vulnerability. [See page 28.](#)
 - o Digital behavioural and emotional analytical tools can also be used at points of consumer-contact to identify consumers who may be struggling. For example, [TrueVoice](#) is a piece of AI software used by Deloitte to analyse, interpret and visualize voice data from call recordings. It recognises subtle behavioural indicators of vulnerability at different moments of customer-firm interaction and identifies behaviours outside of the norm for a particular consumer, this is particularly useful for firms with a large client base.

- **In situations where consumer interaction with frontline staff** is limited, behavioural data sets can be analysed for decision-making limitations and identify vulnerable consumers who have difficulties with remembering, understanding, communicating, and evaluating information.
 - o The 'Traffic Light System' is used for profiling consumers and flagging risk factors. This involves assigning quantifiable scores (or traffic light colours) of consumer vulnerability to individuals, that firms can track over the product/service lifecycle to help streamline support and interventions. For more information [see page 12.](#)

- **Share data between firms and sectors in order to flag consumers most at risk.**
 - o Combining and matching supplier data on consumer consumption patterns to signpost consumers who may be struggling with more than one type of bill, helps build a more holistic overview of the consumer and better understand the specific circumstances contributing to their vulnerability.
 - o For more information on how to implement this approach in practice [see pages 38-58.](#)



Provide consumer assurances

- **Ensure clear and transparent data protection and storage practices for recording and monitoring consumer vulnerabilities:** this can reassure consumers who are avoiding self-disclosure because of uncertainty about how their data will be stored and used.
 - o Consumers are often deterred from self-disclosing and discussing their vulnerabilities by a lack of understanding about who their data will be shared with and how it will be used. A robust strategy for data sharing and matching is needed to ensure firms are able to provide detailed reassurances about the storage and security of personal data.
 - o It is important that frontline staff are well informed in this area as they are often the ones providing the reassurance and supporting consumers to self-disclose. [See pages 40-42.](#)

- **Work closely in partnership with specialist organisations,** agencies and charities who support vulnerable groups. They are best equipped to provide specialist advice and guidance on how to identify vulnerabilities and provide support for those who you identify as most at risk.
 - o For advice on what this type of data sharing could look like in practice [see pages 5-6.](#)

- **Invest time and money in building consumer trust:** if consumers don't trust their providers, they are less likely to disclose their vulnerabilities.
 - o For advice on how to build consumer trust see [\(final report\)](#) pages 76 and 168-281.

- **Remember, defining vulnerability is always the first step towards identification:** mapping out the types of vulnerabilities most likely to be experienced in your firm or sector is the first step towards developing a suitable strategy for identification.
 - o Developing a list of the types of vulnerabilities that your consumers are more likely to experience can help maximize the output of the identification strategies listed above.
 - o For further detail on how to map vulnerabilities specific to your firm and sector [see pages 21-23.](#)