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A study by the Financial Conduct Authority (2018) found that 50% of UK consumers currently show one or more characteristics of potential vulnerability based on their health, financial resilience and capability, and on life events that could be having a detrimental impact on them. That's potentially over 25 million people in the UK.

This was five years ago pre pandemic..... And everything that has come with that



# Consumer vulnerability training

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Adam Carter/Louise Baxter



# A bit about us

- Louise Baxter MBE
- Adam Carter

Trading Standards professionals with over 25 years of combined experience.

We are experts in consumer regulation, consumer education, consumer vulnerability and business advice and guidance.

This is Adam



This is Louise

# Our purpose & ambitions



Our purpose is to make consumer rights easy to understand for everyone in the UK.

It is our mission to support consumer and business alike to ensure consumer information, advice and education is simple and accessible to all. Everyone in the UK should know their consumer rights

# Programme

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- What is consumer vulnerability
- What are the possible causes of consumer vulnerability
- To help you understand how you might identify and work with consumers that may be vulnerable
- Practical tips of how to support consumers
- The opportunity to reflect on current processes

This is not your internal process of what you do to identify vulnerability. This is general awareness raising.



# Learning objectives

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- To help you identify and assist consumer vulnerability.
- To help you ensure that consumers receive the information necessary to make informed decisions and are not exploited.
- To help ensure the consumer gets the best outcomes for themselves.
- To help develop strategies to ensure consumer vulnerability, inclusion and diversity are always considered.
- Provide the opportunities for considering how you can change things within your own organisation.



# Vulnerable consumers

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COLLINS DICTIONARY

*'Someone who is weak and without protection, with the result that they are easily harmed physically or emotionally.'*

*Old people are often particularly vulnerable members of our society.'*



# Question

What is your definition of vulnerable?

What do you think makes people vulnerable?



Vulnerability refers to the inability (of a system or a unit) to withstand the effects of a hostile environment. A window of vulnerability (WOV) is a time frame within which defensive measures are diminished, compromised or lacking.



# Question

Have there ever been situations in your life where you have felt more vulnerable?

If yes, how did you feel during these situations?



Consumer vulnerability in a broad sense, refers to any situation in which an individual may be unable to engage effectively in a market and as a result, is at a particularly high risk of getting a poor deal.

This can be something as severe as becoming a victim of a crime or just not getting the best deal for them at the time.



# Two broad types of consumer vulnerability

- Situational
- Market place



# Vulnerability in the UK



**9.8 million**  
people living with a disability

**944,000**  
People living with dementia

1m by 2030  
1.6m by 2050

**1 in 6 adults**  
Have experienced a 'common mental health disorder' like depression or anxiety in the last week

**18% of children**  
Aged between 7 to 16 had a probable mental health condition in 2022

**23% of us**  
Suffer anxiety when dealing with service providers

**3 million**  
people living with a cancer

3.5m by 2025  
5.3m by 2040

**689,308** People divorcing in 2021

**461,010** Home moves took place on 2021

**689,629** Deaths in the UK in 2021, leaving millions coping with bereavement



**1 in 7 people**  
In the UK have some form of neurodiversity

# Situational vulnerability

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Health

Life events

Resilience

Capability

Circumstance

# Organisational blind spots

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Organisational blind spots around different types of vulnerability can lead to exclusion by accident.

Organisations can have blind spots to certain types of vulnerability, for example bereavement care, mental health or physical disabilities.

**Vulnerability is NOT static**



# Question

What do you think  
your organisations  
blind spots could  
be?



# Market place vulnerability

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Lack of choice or choosing between complex alternatives

Making decisions based on imperfect information

First or a long time accessing the marketplace place

Inability/Difficulty seeking redress

Pressure

Limited supply

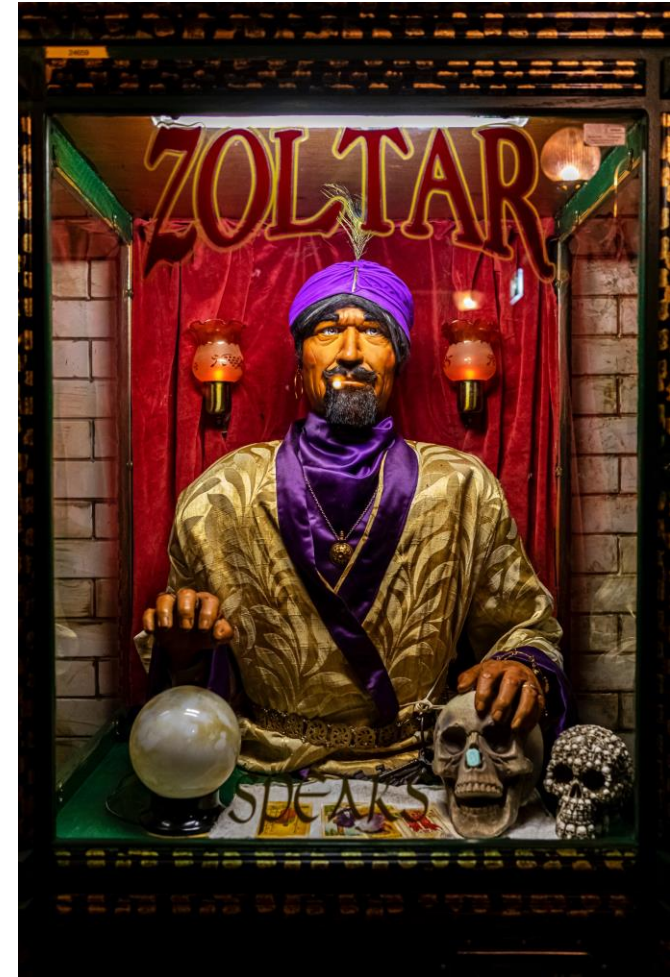
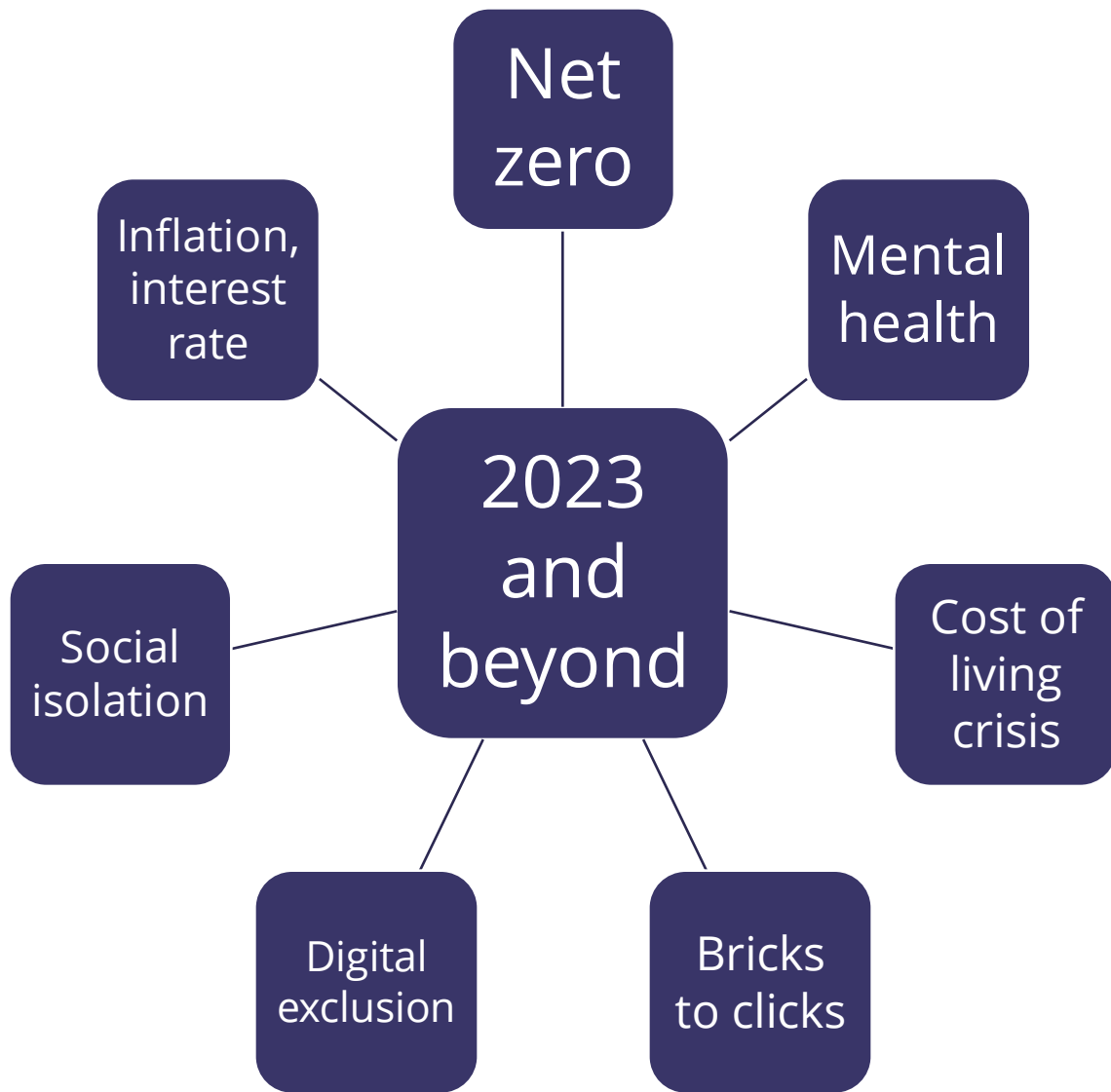
Bricks to clicks, communication channels



# Question

What things could be affecting vulnerability in 2023 and beyond?







## Coronavirus: NHS warns of 'second pandemic' on the horizon - but it's not Covid-related

THE EFFECT the COVID-19 pandemic has had on the UK has been akin to a large explosion. Two years on and the nation is only just beginning to understand the full scope of the damage including the impact the pandemic has had on one area of the nation's health.

By **CHRISTOPHER SHARP**

16:22, Mon, Feb 21, 2022 | UPDATED: 19:01, Mon, Feb 21, 2022



# Mental health statistics

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One in four people will experience a mental health problem of some kind each year in England

One in six people report experiencing a common mental health problem (like anxiety and depression) in any given week in England

On average, people with mental health problems die 15 to 20 years earlier than those without

23% of Black or Black British people will experience a common mental health problem in any given week. This compares to 17% of White British people

Across the UK, men and women in the poorest fifth of the population are twice as likely to be at risk of developing mental health problems as those on an average income

# Question

Are older people  
vulnerable?



# Mild cognitive impairment

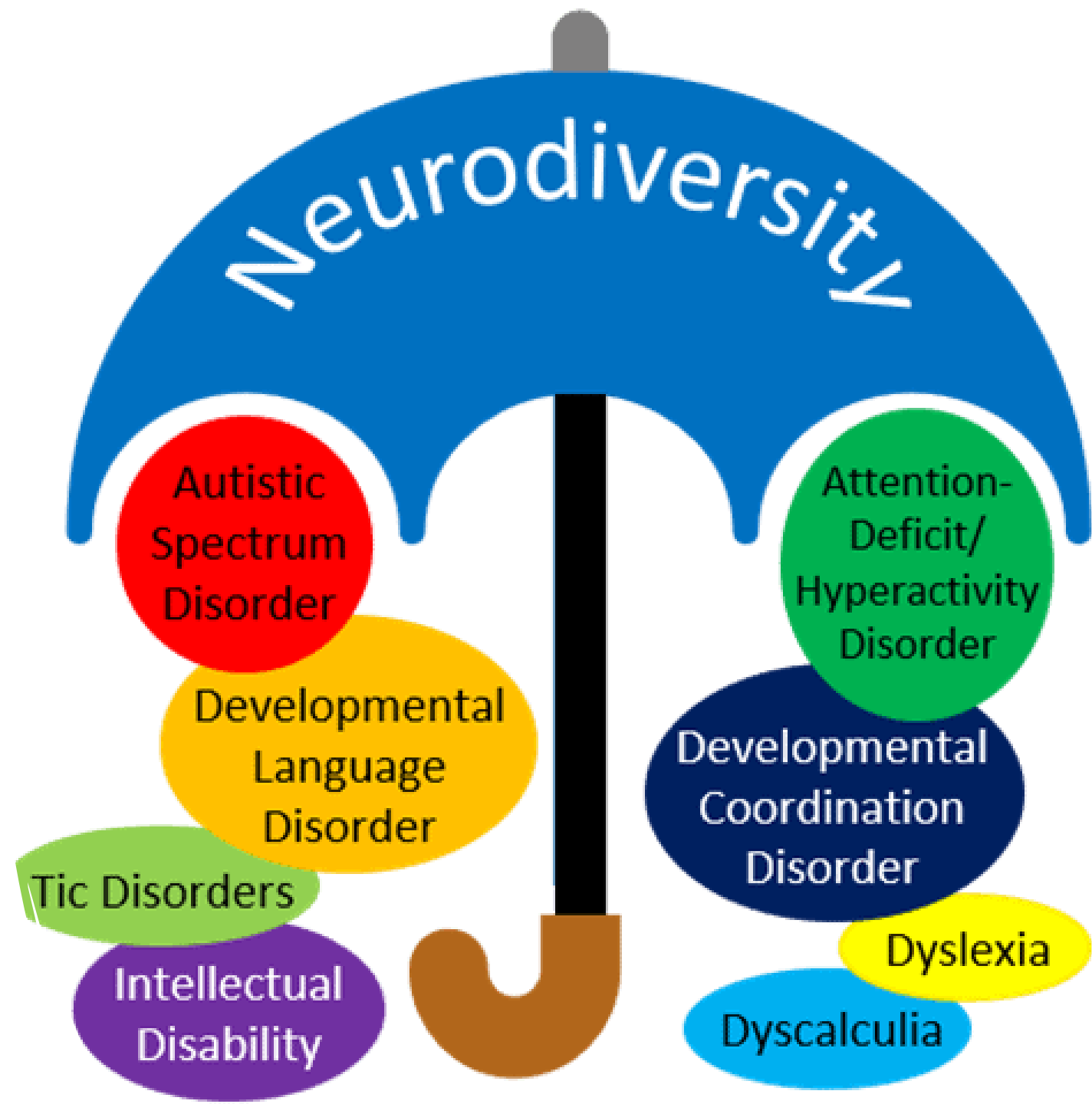
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# Neurodiveristy

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- We are all complex



# Inclusive design



All products or services should be designed to ensure the needs of ALL consumer vulnerability are met, while at the same time benefitting ALL consumers.



Consumer vulnerability should be considered at the design stage of every product and service, from marketing, complaints, redress, plain English, web design, product or service design etc etc



People who have experienced consumer vulnerability are your experts by experience. Seek feedback and involvement early on.



We can all experience consumer vulnerability. We should also use our own experiences.



We should consider reframing it as inclusion



# Inclusive design principles

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Be people centred

Communicate visually and inclusively (have as many different options as you can)

Collaborate and Co-create

Involve consumers early

Feedback, surveys, complaints



# One to consider...

## Gender differences in communication

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### Male

Do not rely on facial expressions, tones of voice, body language to communicate

### Female

Rely on facial expression, tones of voice, body language to communicate

# Always communicate in plain English

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## **Plain English is...**

Communicating in a clear, straightforward way. It should be short sentences and the audience (everyone) should understand what is written, the first time they read it or hear it.





# Starting point

Every consumer who lives in a social housing property is affected by consumer vulnerability.

# Make things right campaign

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**UNACCEPTABLE**

Reported black mould  
and it hasn't been fixed?

Among other things, the white paper says we should use our powers to make sure landlords are accountable for:



providing their tenants with good quality homes and services



prioritising tenants' safety



treating tenants with respect



being open and honest with tenants.



# Regulator of Social Housing



# What would you do?

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A young consumer calls you and says they think they have damp in their flat. They have tried to email but didn't get a response quickly enough in their eyes.

What would you do?



# Question

What do you think could signal consumer vulnerability? How can you tell?



# First things to look out for

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Does the consumer indicate any situation, that could point to consumer vulnerability? Do they tell you something?

Does the consumer behavior indicate vulnerability. Are there any sudden changes in behavior?



**Practical tips on how to  
identify consumer  
vulnerability. This a simple  
code to follow**

**Be REAL...**



# What more can you do...

Be **REAL**

**R** Retain.

Is the consumer able to retain, remember and repeat in their own words the information you give them? Do you have to repeat what you have said over and over again? Do they ask for clarification and ask you to explain the words or terminology being used.

**Don't make assumptions**



# What more can you do...

Be **REAL**

**E** Explain.

Is the consumer able to properly evaluate and explain the decision they have made? Are they joining in the discussion or just agreeing with what you are saying? Are they coherent and fluent in the language being used?

**Don't make assumptions**



# What more can you do...

Be **REAL**

**A** Able.

Is the consumer able to hear, understand and communicate what they are being told and their situation? Are they asking questions that aren't related to what you are saying? Do they tell you their thoughts and questions, do they make sense?

**Don't make assumptions**



# What more can you do...

Be REAL

**L** Listen.

Is the consumer able to listen, follow and understand the discussion taking place, or are they distracted, confused and not hearing what you have to say? Do they take an unusually long time to respond to a question?

**Don't make assumptions**



**What do you do if you  
think someone could be  
showing signs of consumer  
vulnerability**

**TREAD(S) Carefully...**



What more can  
you do...

## TREADS

Treat all consumers  
respectfully, tailor  
your service to the  
consumer



What more can  
you do...

## TREADS

Reiterate and try  
asking questions in a  
different way



What more can  
you do...

## TREADS

Empathise and  
sympathise with the  
consumer. If they  
share something say  
thank you.



What more can  
you do...

## TREADS

Ask the consumer what  
they need and how you  
can help them better.  
Be proactive and be  
visible, let consumers  
know what help they  
can get



What more can  
you do...

## TREADS

Don't make  
assumptions about  
the consumer



What more can  
you do...

## TREADS

Summarise what has  
been decided or  
agreed in plain English





**DOCUMENT IT**



**ACT TO REDUCE THE RISK OF HARM**



**BE FLEXIBLE**



**BE SUPPORTIVE**

If you think someone is showing signs of consumer vulnerability



**OFFER INFORMATION IN A DIFFERENT FORMAT**



**PROVIDE ADVICE AND SUPPORT IN PLAIN ENGLISH**



**ASK THE CONSUMER WHAT THEY WANT, NEED, INVOLVE THEM IN THE PROCESS AND ALL DECISIONS THAT RELATE TO THEM**



**REVIEW PROCESSES, IS THIS A ONE OFF OR ARE OTHER CONSUMERS HAVING SIMILAR ISSUES**

# What more can you do as an organisation?

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- Be proactive, embed fair treatment in your organisation.
- Make this relatable to ALL staff.
- Sometimes forgotten, ensure All staff are also supported.

# What more can you do as an organisation?

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## **Remember inclusive design**

Consumer vulnerability and consumers should be considered at all stages of the product and service design process.

## **Remember communication**

The right communication channel can potentially differ significantly for different groups of consumer.

**Plain English  
is key**



# Remember

Consumer vulnerability is fluid and multi dimensional, people can move in and out of periods of vulnerability

We don't call people vulnerable



# Final questions

How could you think  
about your job  
differently?

Could you do anything  
differently?



# What can we do for you?

info@consumerfriend.org.uk

Provide virtual training session to your teams

Provide access to the Consumer Friend eLearning package through our training platform

Consumer vulnerability Policy writing which can be bespoke for your organisation

Consumer vulnerability reviews and audits

Bespoke complaint support

Regulatory compliance support



# What If.....

...we changed the way we think.....  
A new way of thinking is truly  
overdue.....

What if we start to think, NOT about the perceived failings of a person, not what is wrong with a particular person, but we should be asking, what can we do differently, what is wrong with my service or my business if this person can't access it!





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Any last  
questions?

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