



## Citizens Advice – Hart District Limited

### Supporting Vulnerable Clients Policy

Ownership:	Chief Officer and Service Delivery Lead Trustee
Date Issued:	This policy was approved by the Board on 23rd July 2025
Version (Y.M)	2025.07
Review date of policy:	Next review date is July 2028
Review frequency:	3 years
Review Notes	Reviewed with reference to the <a href="#">model policy</a> on the CA Intranet - Updates throughout to align policy with FCA guidance on the fair treatment of vulnerable customers and Consumer Duty. Also added terminology position at beginning of document about the use of the term 'vulnerable'.
Is training required/provided?	Referenced in the induction training
How is this policy made available?	Via the Office Manual
Evidence of use?	<ul style="list-style-type: none"> <li>Reviews of outcomes for vulnerable clients and any service improvements made as a result</li> </ul>

	<ul style="list-style-type: none"><li>• Training plan / training records reflect training planned or delivered to effectively identify and support vulnerable clients</li><li>• Records of safeguarding disclosures</li></ul>
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# Supporting Vulnerable Clients Policy

## Terminology

Throughout this document we use the term 'vulnerable' to describe clients and the challenges they face. This term is widely used across the Citizens Advice network, by local authorities and regulators such as the Financial Conduct Authority (FCA). We choose to mirror this term so this policy aligns with embedded terminology.

However, as an organisation Citizens Advice takes a critical view of the term 'vulnerable', used to describe an individual or a group. Describing someone as vulnerable implies that the risks they face are intrinsic to them, rather than being situational. Vulnerability is a consequence of an unjust world, rather than being a quality that an individual has because of their personal characteristics.

Other resources may use terms like 'marginalised' or, discuss clients being at particular risk of disadvantage, detriment and harm. Although there are differences in terminology, our key messages refer to the same groups of clients.

## Introduction

This policy sets out how Citizens Advice - Hart supports our vulnerable clients, and the principles of how our staff and volunteers should deal with situations relating to vulnerable clients.

The aim of the policy is to improve the experience and outcome for vulnerable clients regardless of the channels they use to access our services.

Local Citizens Advice are authorised and regulated by the Financial Conduct Authority (FCA), it's this authorisation allows local offices to give debt advice. Without it, we would not be able to provide money advice at any level, including as part of generalist services. Because of this, the policy refers to definitions from the FCA and the Consumer Duty principle and cross cutting rules outlined in the [FCA's Consumer Credit Sourcebook \(CONC\)](#) and [Consumer Duty rules and guidance](#). It also draws from official [FCA guidance on treatment of vulnerable customers](#).

## What is vulnerability?

Vulnerability cannot be defined with a one-size-fits-all statement. It will not always be immediately clear if a client is vulnerable. But it is important that as an organisation we are aware of the potential for all of our clients to be vulnerable. We're committed to identifying when and how clients may need adjustments to better access our services, recognising client's may not label themselves as 'vulnerable' but may still face barriers to getting help and that their need for extra support may also fluctuate throughout the time they're accessing our services.

The following factors could be helpful in determining if a client is vulnerable:

- Individual factors
- Health (physical or mental)
- Life events
- Low capability (e.g. poor literacy or numeracy skills)
- Low resilience to cope with emotional/ financial shockCreditor or adviser action or inaction

The Financial Conduct Authority (FCA) has defined a vulnerable consumer 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."*<sup>1</sup>

The FCA considers local Citizens Advice a *"limited scope not for profit firm"* under our registration with them, which enables us to provide debt advice to clients. We acknowledge their definition as part of this policy and our practices associated with the identification and treatment of vulnerable clients.

Our definition of 'vulnerable clients' is separate and different to the definition of 'adults at risk' as outlined in the Care Act 2014 (England). We recognise however that both groups are likely to overlap and will ensure that clients who meet the definition of an 'adult at risk' or clients who are children will also be considered under the appropriate safeguarding policy and procedures.

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<sup>1</sup> Financial Conduct Authority (2015) Occasional Paper No. 8 Consumer Vulnerability: Executive summary

## Our approach to identifying and supporting vulnerable clients

We are committed to achieving good outcomes for clients and treating them fairly, including vulnerable clients - in order to do this we will:

- ensure that we remain aware of the potential for our clients to be vulnerable
- make sure our staff and volunteers know how to recognise and respond to the needs of vulnerable clients
- encourage clients to feel comfortable disclosing any vulnerabilities to us
- understand that we may need to make adjustments to our standard processes to allow vulnerable clients to request and access our services
- take vulnerabilities into consideration in how we design and provide our service to vulnerable clients
- measure and analyse how we meet the needs of vulnerable clients and what outcomes are delivered on a ongoing basis to help make improvements

## Common areas of concern

### Mental capacity

The FCA defines mental capacity as: *“A person's ability to make a decision. Whether or not [a person has the] ability to understand, remember, and weigh up relevant information will determine whether the customer is able to make a responsible...decision based on that information.”*

There are specific considerations and guidance relating to debt advice for clients who have mental capacity limitations as outlined in the FCA handbook, we commit to following these and treating clients fairly.

It is important not to presume that all clients with mental health issues also have a mental capacity limitation.

Mental capacity is not the same as mental health. Some clients with mental health difficulties may have mental capacity limitations, but some will not.

Mental capacity limitations can also fluctuate. For example, a person with dementia may find that they have capacity in the mornings, but struggle to understand and retain information as the day progresses. In this instance we would accommodate the client by offering advice and appointments in the mornings.

In our support of clients with, or we suspect to have, mental capacity limitations, we will:

- encourage clients to feel comfortable disclosing any potential mental capacity limitations<sup>2</sup>
- look for indicators that a client may be lacking mental capacity, and not just rely on clients to tell us
- adapt practices and procedures where possible to assist subject to compliance with statutory requirements
- allow the client sufficient time to weigh up information and advice given
- aim to present information in a straightforward way using plain English to make things as easy as possible for clients to understand
- record the mental capacity limitations where identified, and help the client to make an informed decision

## Disclosures of sensitive personal data

Clients in vulnerable situations will often disclose personal data. We have adopted a [data protection](#) policy in line with general data protection regulation (GDPR). We will ensure that all staff are aware of the importance of following our GDPR data protection policy the [GDPR data protection policy](#), available as linked or through the Office Manual.

## Clients who talk about taking their own life

There may be occasions when staff and volunteers suspect or are told by vulnerable clients that they are considering taking their own lives. We recognise that these situations may be rare, but that it is important that staff and volunteers are clear about what action to take.

We will ensure that staff and volunteers are aware of the importance of the following steps:

- listening to the client, acknowledging their circumstances and feelings and making it clear we are taking them seriously
- understanding our safeguarding policies which explain the circumstances around breaching client confidentiality and calling 999 in an emergency
- awareness of the [procedures and model policies for safeguarding adults and children](#)

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<sup>2</sup> Examples of this can include clients with dementia, severe learning disability, brain injury or a mental health condition.

We will ensure that staff and volunteers are able to seek support following these challenging situations.

## **Clients with a terminal, life-threatening or long-term condition**

We recognise that being told a client is suffering from a serious illness or condition can be difficult to hear. Staff and volunteers may be concerned about how to respond and the best way to support clients in these circumstances.

We will ensure that our staff and volunteers are aware of the following ways to help the client, fully acknowledging and communicating their own boundaries:

- ensure the advice we provide is adapted to take into account the client's illness or condition
- signpost to trusted sources for additional support with their conditions where possible
- acknowledge the disclosure of a serious condition in an appropriate and sympathetic way
- ask the client if they mind talking about the situation and ask for information about their illness or condition and what it is like for them. We won't make assumptions as we recognise everyone's experience will be different
- listen to a client who has disclosed a serious illness or condition and ask the client what support they need
- be sympathetic, and avoid the use of phrases such as "I know how you feel"
- be aware that clients in these situations may have a range of emotions including confusion, anger, distress, fear, depression and sadness

We will ensure that staff and volunteers are aware of the importance of looking after their own wellbeing and that they can seek support from their line managers whenever needed.

## **When someone else gives us information about a client**

In some situations, we may receive information from a carer or family member about a vulnerable client.

We will ensure that our staff and volunteers understand that whilst they should not discuss a client's case with anyone who does not hold the appropriate authority, this does not mean they cannot listen to the information being provided by a third party.

We recognise that disclosures from carers can be valuable. We are committed to engaging with carers and taking appropriate action, whilst ensuring that we maintain client confidentiality.

Our [client confidentiality policy](#) has more detail about this. We will ensure that all staff and volunteers are aware of the policy.

## **If creditor agencies are failing vulnerable clients**

If we are concerned that a creditor agency is failing vulnerable clients, we will consider requesting copies of its policies and procedures for dealing with these customers. We will then use the information provided to assist us in pursuing a client's case and also in making the creditor aware of potential breaches of the regulatory framework such as the FCA handbook and the Consumer Duty, which states that:

“A firm must establish and implement clear, effective, and appropriate policies and procedures for:

- dealing with customers whose accounts fall into arrears
- the fair and appropriate treatment of customers, who the firm understands or reasonably suspects to be particularly vulnerable”

We can also consider using the creditor's complaints policy, or seeking advice from the national Citizens Advice Creditor Liaison Policy Officer and in extreme circumstances we reserve the right to report organisations to the FCA directly if these failures are persistent and extensive.

Although this section relates to clients receiving debt advice, we will consider taking the same steps and considerations for clients who present as vulnerable when accessing advice on other areas such as benefits or housing etc.

## **Supporting and training staff and volunteers**

We will ensure that all staff and volunteers receive appropriate training, to support them to effectively identify and support vulnerable clients.

We recognise that staff and volunteers may require extra advice, support and guidance when working with vulnerable clients. This support is available from their line managers in the first instance and accessing services like Togetherall when needed.



## **Review of policy**

This policy will be reviewed every year. If the law changes before the policy is due for review, we will update the policy as needed.