



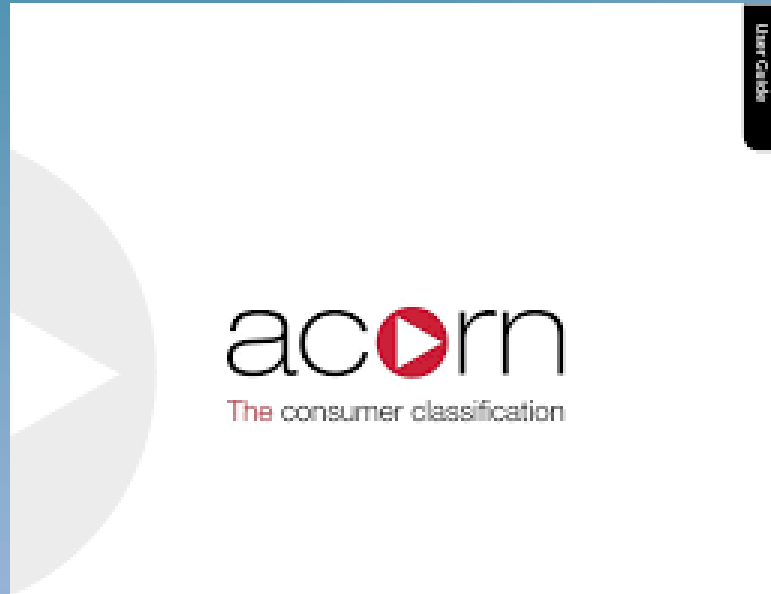
Vulnerability
Registration
Service

The Vulnerability Registration Service

www.vulnerabilityregistrationservice.co.uk

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Data sources and definitions

Sources of data

- **Self-registration:** Individuals can register themselves with VRS providing a minimal amount of contact details and the option to select sub-flags that are relevant to their situation.
- **Power of Attorney:** An individual can register on someone else's behalf where they hold a Power of Attorney, once we have validated that POA.
- **Court of Protection Order:** VRS obtains registrations from local authorities, solicitors and estate management companies where a Court of Protection is in place and the individual lacks the mental capacity to manage their own financial affairs.
- **Charities / debt management companies:** Charities and debt management companies can provide data to VRS where they have a legal basis to do so.
- **VRS users / clients:** VRS has reciprocal data sharing agreements in place with its clients in order that organisations can share data where they have identified vulnerability.

Definitions of vulnerability

VRS have developed a number of sub-flags to help provide insight into an individual's vulnerability and to be compatible with regulators, sector or individual organisations own vulnerability definitions:

Physical disability

Mental health

Cognitive disorder

Life event

Financial hardship

Financial capacity

Debt Management
Programme

Coronavirus

Risk of Coercion

Accessibility

Physical health

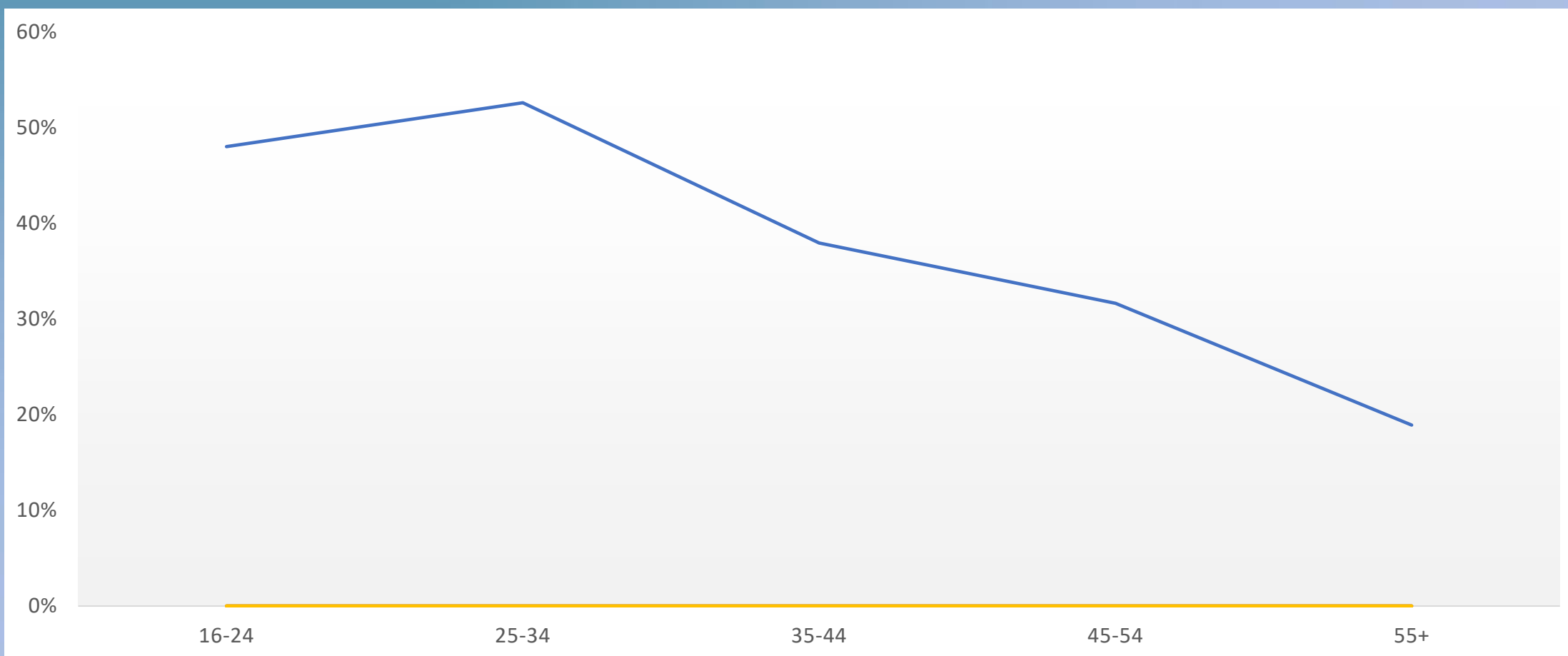
Gambling
addiction

Deceased

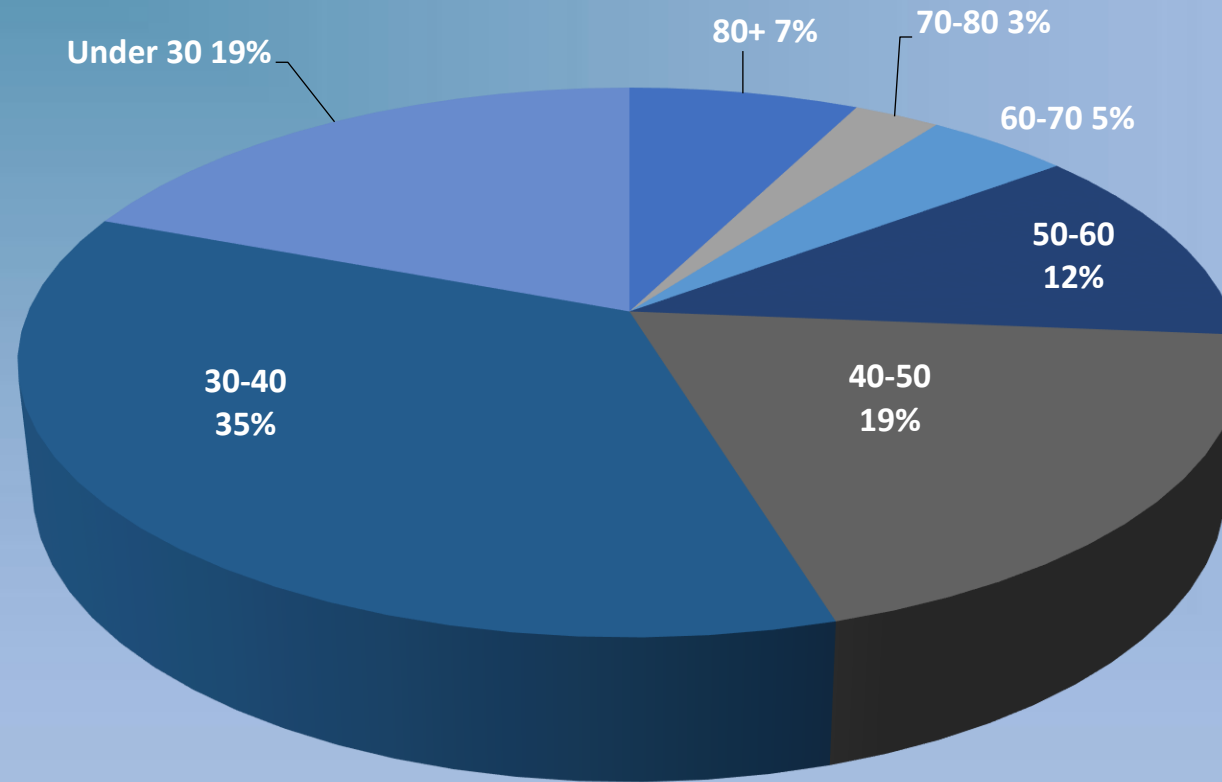
Do you consider yourself to be vulnerable?



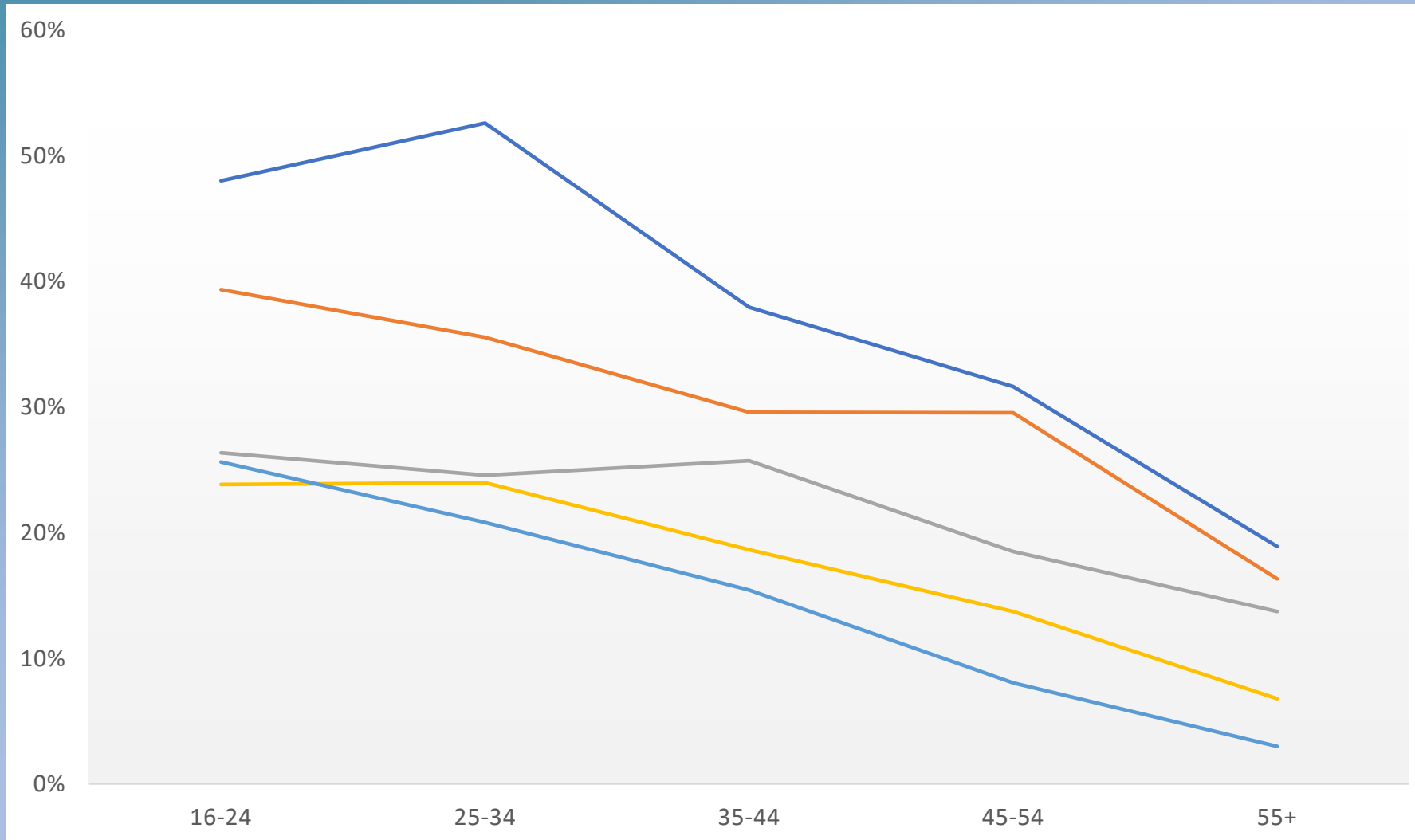
34% of people considered themselves to be vulnerable



Age Breakdown



Do you consider yourself to be vulnerable?



Protecting vulnerable consumers is a key priority for us. We want to see firms explicitly embedding the fair treatment of vulnerable consumers in their culture. Where we find that firms are not doing enough to ensure that consumers are treated fairly, we will take action. We expect firms to take particular care to ensure that vulnerable consumers are treated fairly as they may be more likely to experience harm.

FCA: Financial Lives. July 2020

Our [Vulnerability Focus Report](#) identified the transient nature of vulnerability and the subsequent importance of companies having accurate, good quality information about their customers' circumstances in order to understand their needs and be able to support them effectively. Our Report also noted that data sharing may help companies to recognise affordability issues much earlier – it is usually the case that if a customer is struggling to pay their water bill, they will likely have trouble paying other bills.

Ofwat – January 2017

Remote gambling operators already have the capability of identifying customers who may be harmed by gambling. Our evidence shows that the industry has not used this capability sufficiently to reduce harms. We are therefore consulting on stronger requirements that will help ensure remote gambling operators do more to identify consumers who may be harmed by gambling and to interact and take action sufficiently early and effectively to prevent harm.

Gambling Commission – November 2020

People in vulnerable situations, should not be asked to submit the same information, for similar purposes, multiple times. The process of registering for support should make the best use of this data the first time it is submitted. Consumers should be able to use permissions to keep all their essential service providers updated of their status, through secure data sharing.

Citizens Advice - Getting support to those who need it – October 2020

At present, organisations usually only become aware of such situations if the customer (or a third party acting on their behalf) tells them about it. This means that if a customer doesn't disclose the situation to any, or all, of the organisations they encounter they will not receive support they may be eligible for. Data-sharing between organisations may offer a way to ensure the customer gets all the support they need, without requiring them to have the same conversation with multiple different organisations.

Sharing is Caring. University of Bristol – Personal Finance Research Centre. April 2018

There are many facets and forms of vulnerability. Firms should consider all contributors and circumstances that may make a customer vulnerable. Whilst some vulnerabilities are permanent, others can be fluid, temporary or occur at changing intervals, or lead to other or enhanced levels of vulnerability. Firms should be alert to changes in an individual's circumstances and handle these changes sensitively.

Association of British Insurers – Addressing Customer Vulnerability – 2017



Communicating vulnerability

56% would tell of vulnerable circumstances if asked

67% believe organisations should put checks in place to identify vulnerability

64% would share details of vulnerability if it means that they will receive better support from organisations

41% feel they have been unfairly treated with regard to their vulnerability in the last 12 months

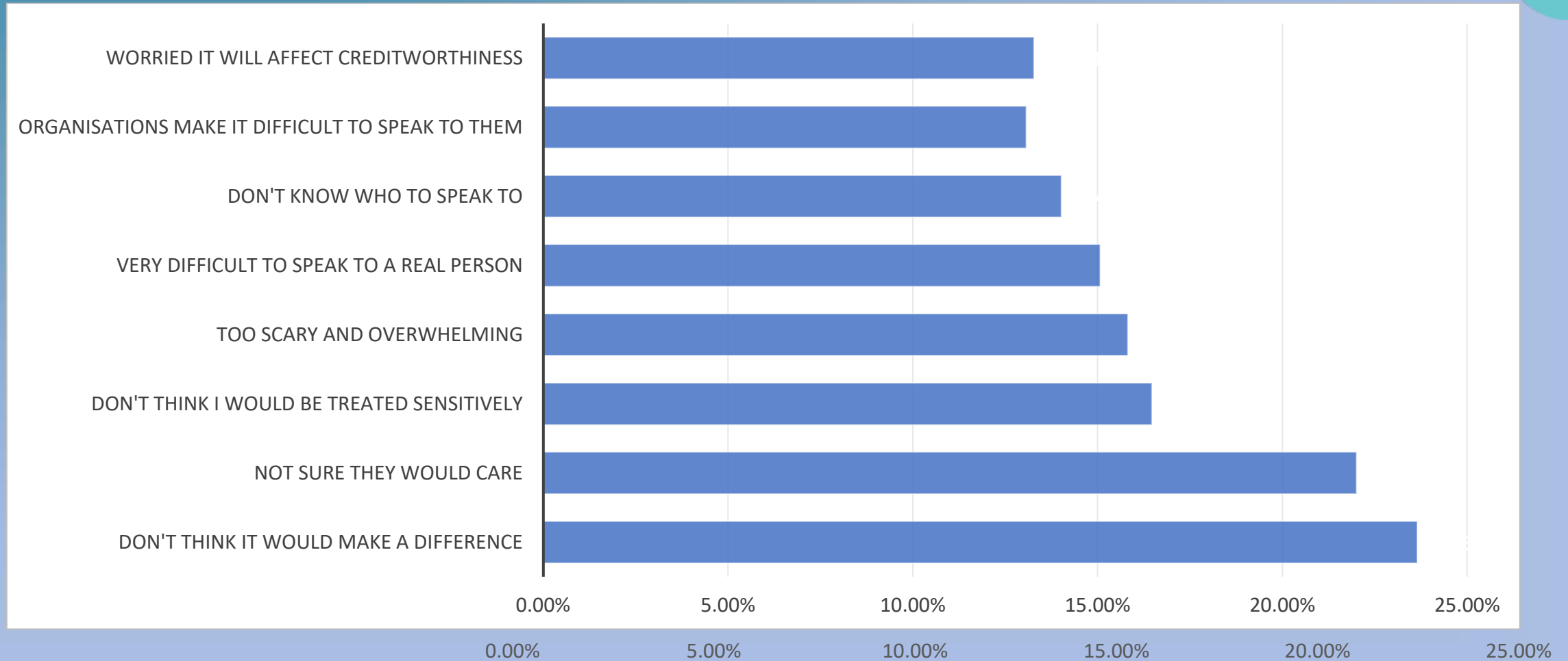
45% have had deal with an organisation on behalf of a vulnerable family member or friend

8% have been trying to communicate their health issues for over 10 years

25% of people experiencing a life event are still trying to get it taken into consideration after six months



Reasons for not disclosing vulnerability



Two in five have felt unfairly treated by organisations not taking their circumstances into account in the last 12 months



Experience of discussing vulnerability

35% found repeating circumstances to different departments difficult

32% felt they were passed around to different people / left on hold / left with automated messages

29% found it difficult to find the right person or the right department to speak to

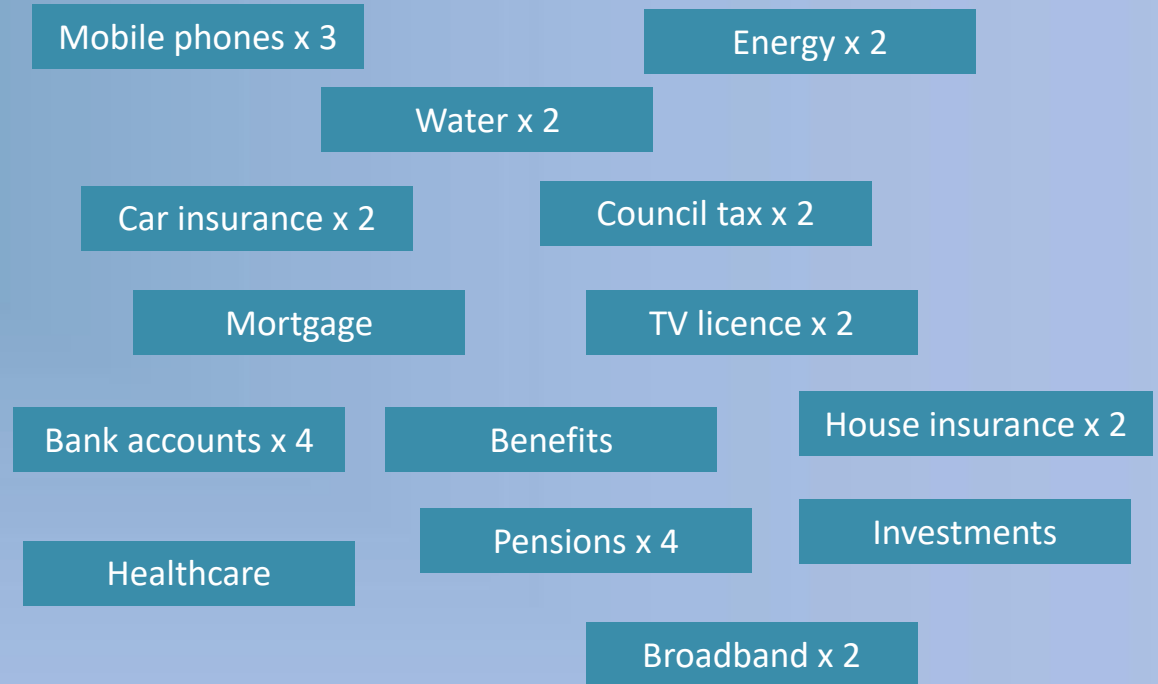
30% felt that they had been treated with empathy

29% felt that the organisation acted upon what they had been told and they received help and support



Vulnerability is multi-faceted

- 38% said that mental health suffered because of vulnerable circumstances
- 27% say that mental health affects their ability to carry out day to day tasks
- 44% of people with mental health issues have debt crises



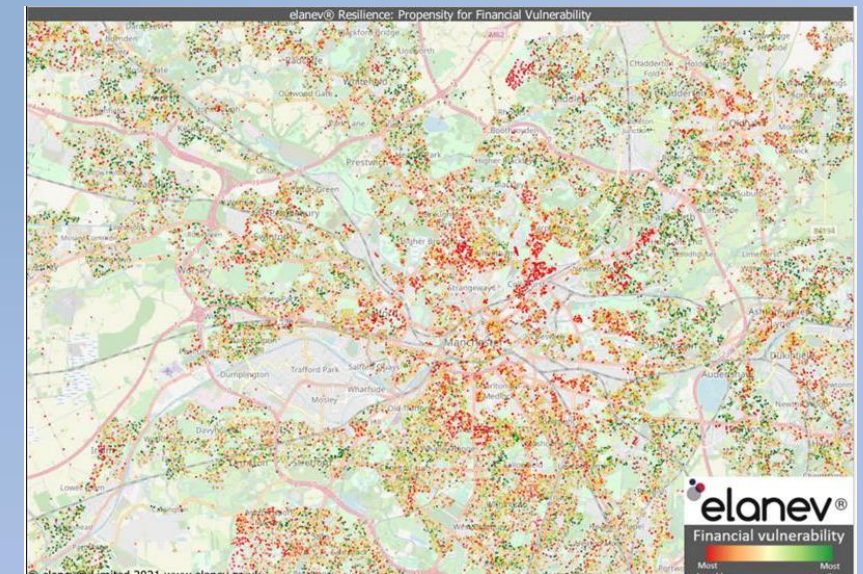
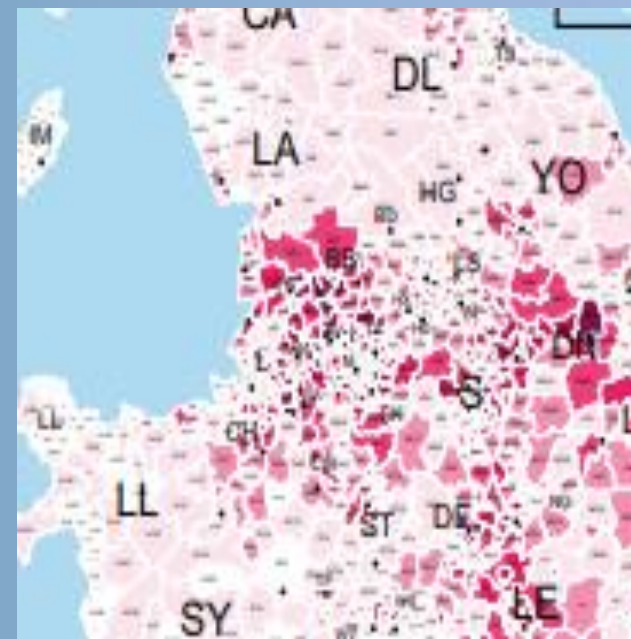
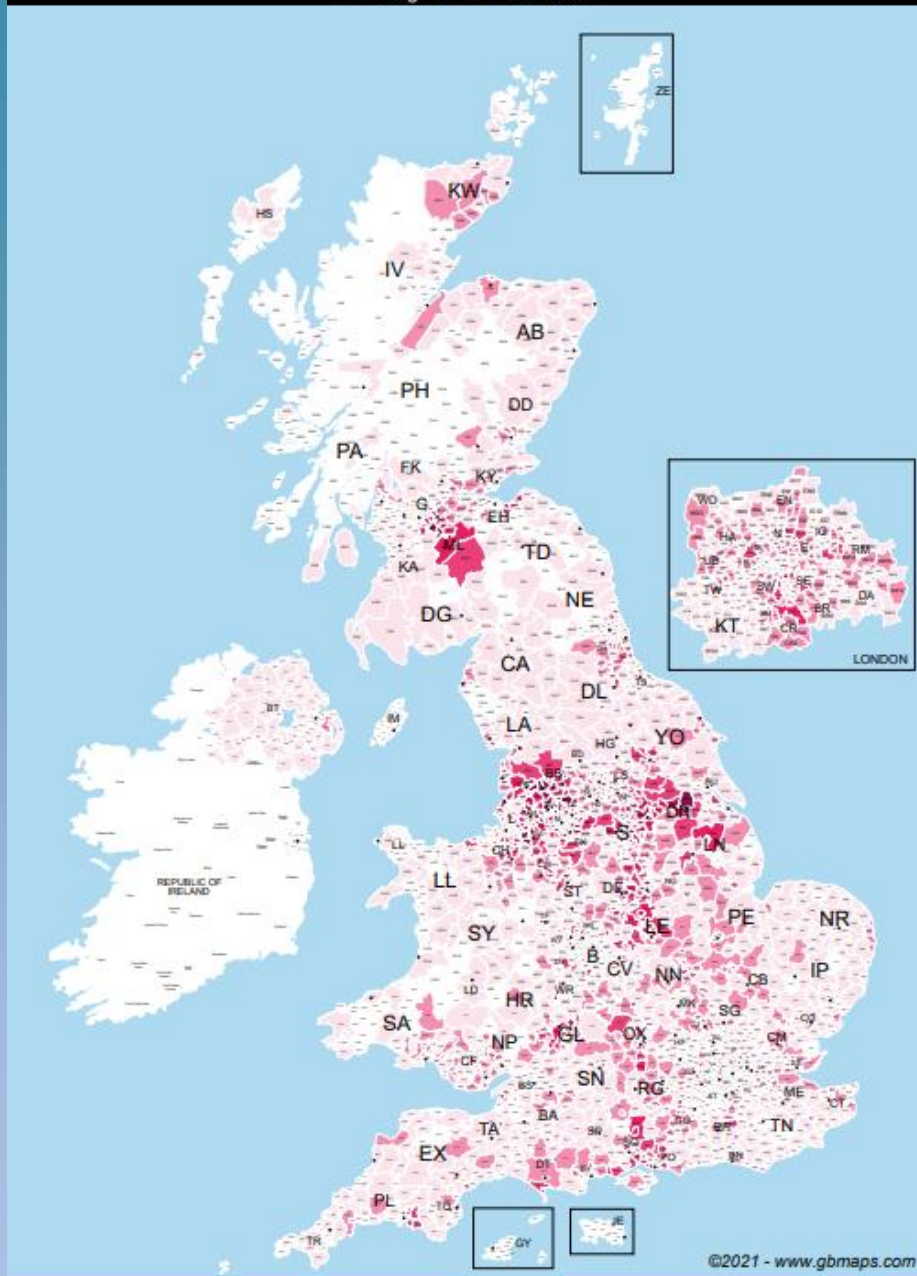


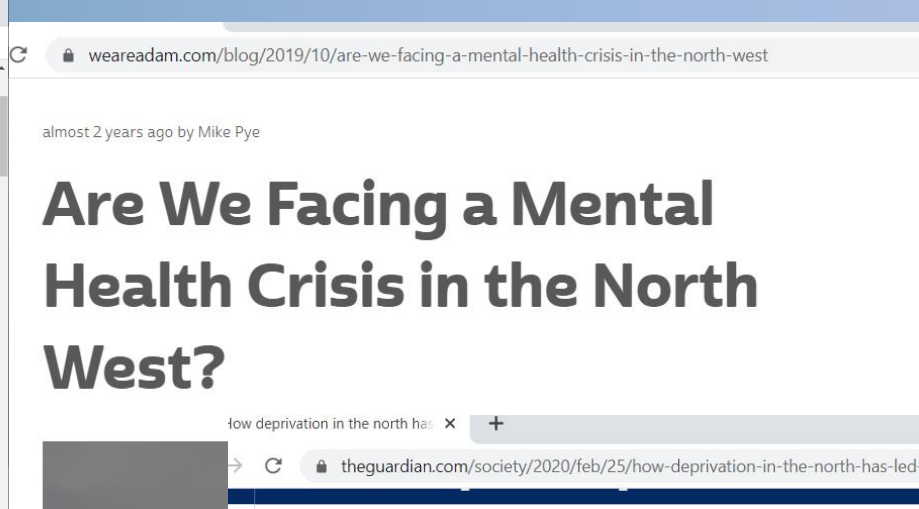
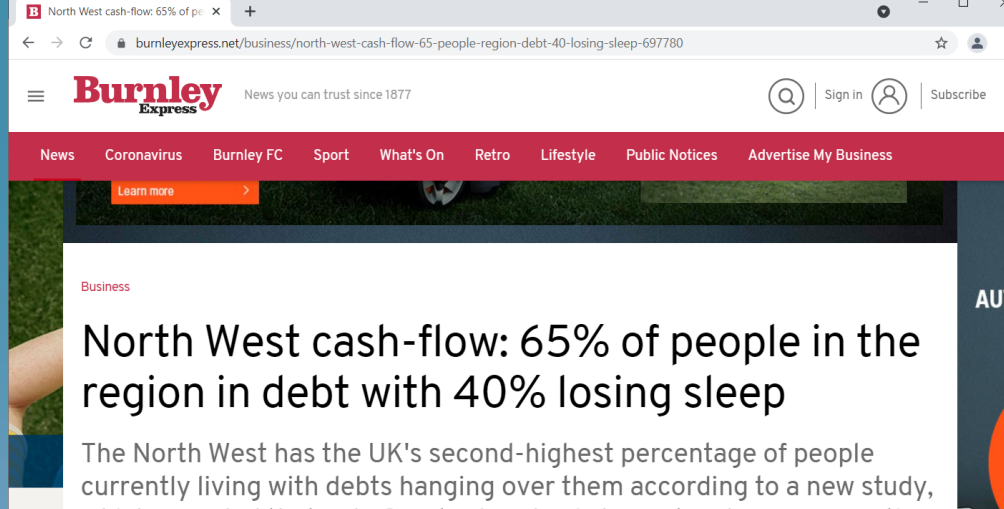
Postcode breakdown

- PR1 ,PR2
- WA7,WA8
- BB1,BB2
- BL1,BL3,BL4,BL9
- L4, L9, L13, L14 L20, L21
- SK5
- OL11, OL12
- DN4, DN15
- WN2
- ML3
- M26, M40
- S5
- CH41, CH42

Preston, Leyland, Southport, Chorley
Warrington, Widnes, Runcorn
Blackburn, Burnley, Accrington, Clitheroe
Bolton, Bury
Liverpool, Bootle, Ormskirk, Prescott
Stockport, Macclesfield, Cheadle
Oldham, Rochdale
Doncaster, Scunthorpe, Grimsby, Gainsborough
Wigan, Skelmersdale
Motherwell, Hamilton, Wishaw, Lanark
Manchester, Sale, Salford
Sheffield, Rotherham, Chesterfield
Birkenhead, Chester

VRS Registration Distribution

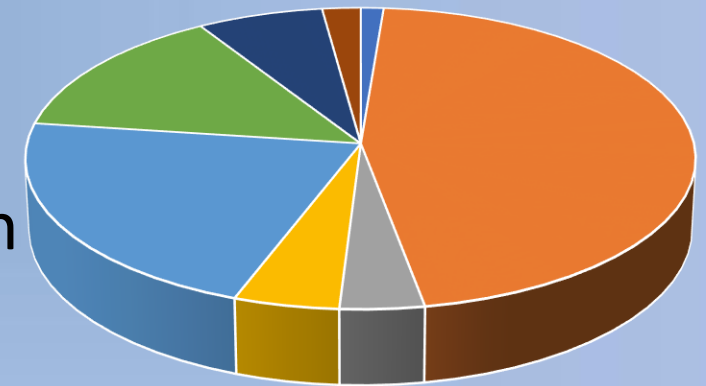






Registrations on VRS

- A significant minority are from 'comfortable' households – 14%
- Typically, very little savings
- Income lower than average
- High occupancy family areas
- Lower representation from rural communities
- High dependency on benefits
- Council or housing association accommodation
- High occupancy
- Low internet use



- Accessibility
- Cognitive Disorder
- Financial Capability
- Lifecycle event
- Mental Health
- Physical Health
- Physical Disability



Poorer pensioners

- Registrations from older people come from poorer areas
- Social rented flats; sheltered or retirement accommodation
- Often claiming benefits
- Low chance of savings on investments
- Low internet use – prefer traditional methods of communication
- Traditional approach to finances
- Focus on utilities
- Risk of coercion and scams

3.2 million people
over 80

1.6 million people
over 85

418K people in care

2.8 million elderly
with care-related
needs

Over 900K living
with dementia

16% of pensioners
in relative income
poverty

13.6 million unpaid
carers in UK

£1.8 billion in
unclaimed pension
credit

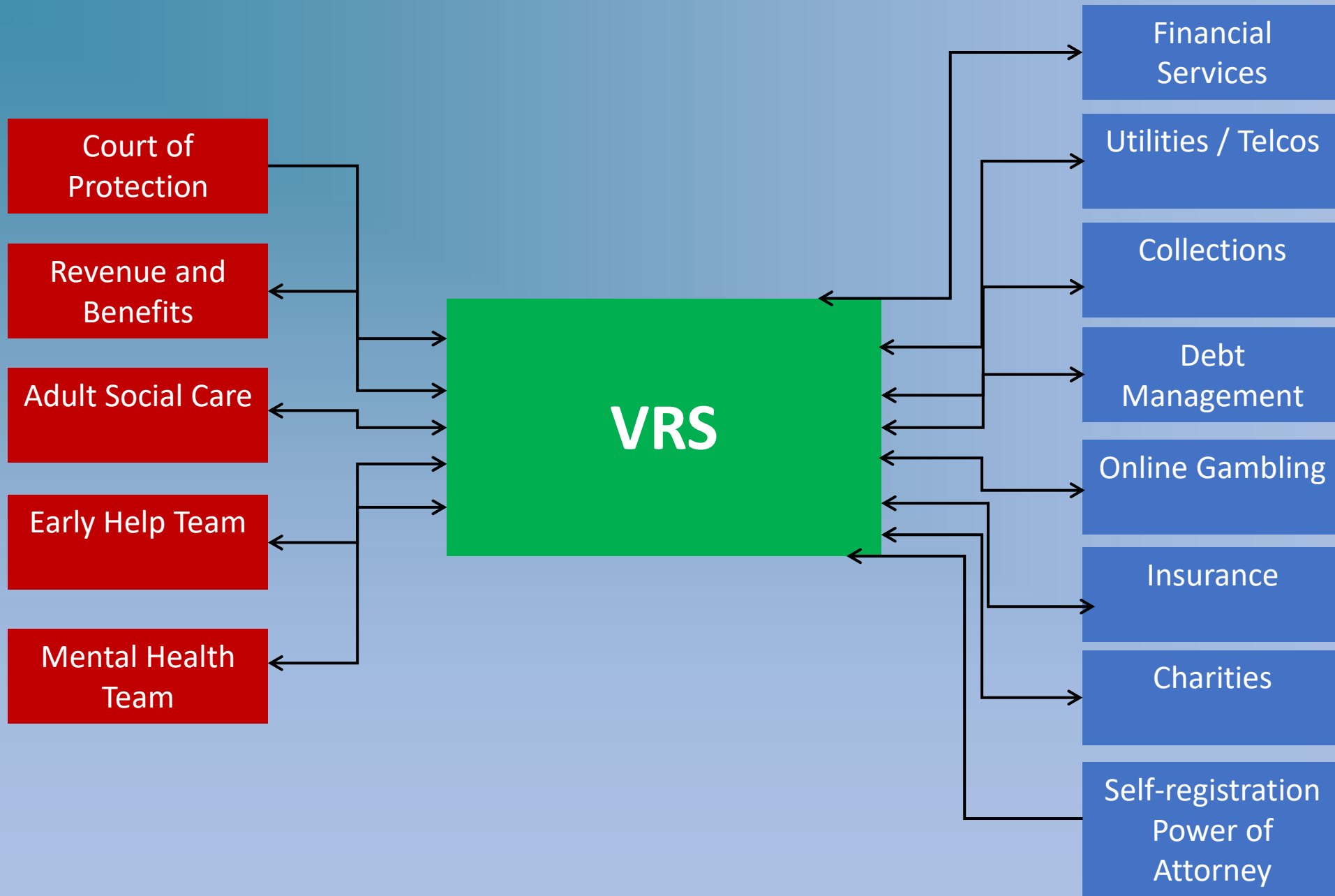
3.4 million
pensioners missing
out on Attendance
Allowance



Low income

- Large families surviving on benefits
- Council or housing accommodation
- Social rented terraced housing
- Some first time buyers – mortgage with a long period to run

- Young adults
- Single parents
- Under 35s with young children
- Often benefit claimants
- High proportion of health problems
- Indebtedness





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