



Palace Gate Building Services Limited

Vulnerable Client Policy

1. This policy is designed to ensure vulnerable clients receive the support and assistance they need tailored to their individual circumstances. It sets out the actions and behaviours we strive to uphold.

What is a vulnerable client?

2. A vulnerable client can be described as:
3. 'An individual who, due to their personal circumstances and characteristics, is significantly more likely than an average person to be at risk of harm;

particularly in connection with how we interact with them, or where the nature of their vulnerability is likely to result in a more substantial risk of harm.'

Vulnerability Factors

4. Vulnerability can be caused by a number of linked factors that can create a vulnerable situation, such as:
 - a. **Individual factors:** health condition, emotional state, or communication difficulties.
 - b. **Wider circumstances:** life events, sudden household, or social changes.
 - c. **Organisational actions (or lack of):** how an organisation treats its clients and the actions it takes or fails to take.

Stages of Vulnerability

5. Vulnerability comes in many forms. These are often not visible and can be acquired, temporary, situational, or permanent. Many people in vulnerable circumstances would not regard themselves as 'vulnerable', and two people experiencing the same issue or event might interpret their degree of vulnerability differently.

Vulnerability Characteristics

6. For the purposes of this policy an individual may be potentially vulnerable or vulnerable if they (or their appointed representative) disclose or indirectly mention one, or more of the following circumstances or characteristics (including but not limited to): -

| Mental Capacity or Mental Health Impairment | Physical Impairment | Life Event |
|--|---|-----------------------------------|
| Cognitive incapacity (e.g. Dementia, brain damage) | Sensory loss or impairment (e.g sight, hearing) | Redundancy |
| Psychosis, anxiety, stress, depression, dissociative identity disorder (DID) | Physical disability | Bereavement |
| Addiction (e.g drugs, gambling, alcohol) | Life limiting condition. (e.g. cancer, motor neurone disease) | Fraud/scam victim Intimidation |

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|--|--------------------------------------|--------------------|
| Learning & communication difficulties (e.g. dyslexia, autism) | Mobility/dexterity | Age-related issues |
| Poor literacy/numeracy | Speech loss or disorder | Debt/bankruptcy |
| Low financial understanding | Temporary ill health/accident/injury | Divorce/separation |

7. It is important not to place an assumption on a client that they are vulnerable. For example, not all elderly or disabled people are vulnerable.

Reasonable Adjustments

8. Consideration will need to be given to any reasonable adjustments that certain individuals may need due to their vulnerable characteristics, taking into account mental capacity and equality legislation. Such adjustments can include (but not limited to):
- a) The need for material to be translated into a different language, and or braille.

- b) Using their preferred way of communication - by email, telephone (time of a call morning/afternoon). Speaking to a friend, family member or appointed attorney, if asked to do so.
 - c) Increased text size, and or alternate fonts, and colours used.
 - d) Providing information in a format that is easier for them to read.
 - e) Allowing them additional time to consider any advice provided by your client facing teams.
 - f) Assigning a single point of contact to manage a consumer's interaction (communication) with you, if appropriate.
 - g) Offering possible alternate solutions based on our current capabilities, if the consumer is unable to use your online service or alternative payment solutions.
 - h) Offering early morning appointments or appointments at a given time slot.
9. Dealing with vulnerable consumers applies to current and prospective clients. It involves being able to identify a vulnerable client and having processes in place to protect them from any potential harm caused by business practices.

10. It is important to note that businesses can exacerbate the effects of vulnerability or create barriers for clients through poor practices.

11. As a business Palace Gate Building Services Limited aim to:

- a) Ensure client facing staff are trained on how to spot a vulnerable consumer and how to deal with that client appropriately.
- b) Ensure client facing staff are trained on how to comply with data protection legislation regarding sensitive personal data. The client's freely given consent must be obtained to record and use information about their vulnerable circumstances.
- c) Ensure that policies and/or procedures are in place for the identification of vulnerable clients and how to protect them from any potential harm.
- d) Appoint a person or group of people in your business to take responsibility for vulnerable client issues as a whole and deal with any staff queries.

Dated: 29th January 2024