



HM Government

# Debt Management Vulnerability Toolkit for service and policy managers

Created by Government Debt Management Function

Version 2: Updated 2023



# The Fairness Group

The government established the Fairness Group in 2016, bringing central and local government, the debt advice sector, and the debt collection industry together.

The Fairness Group is responsible for examining fairness in government debt management practices and making evidence-based recommendations for change. This includes fairness in relation to the treatment of vulnerable customers, while ensuring the government is fair to taxpayers and those that do pay on time, by taking a proportional response to those that do not.

# Purpose of this toolkit

This toolkit has been developed by the Fairness Group, led by the Government Debt Management Function (GDMF). It is designed to help public sector bodies recovering debt to identify and support all customers, including those who may need additional support (often called ‘vulnerable customers’).

For policy makers and those designing service policies and processes, it offers examples of best practice and changes that can be considered and incorporated into your organisation(s).

It draws on best practice from within the public sector debt management context, as well as established tools and practice from other industries.

Alongside this toolkit, we have also produced a guide specifically for frontline staff, designed to be used when interacting with customers as a prompt of key tools and guidance. View the frontline toolkit on [GOV.UK](https://www.gov.uk)

The GDMF Fairness Group have also produced a dedicated **Public Sector Economic Abuse Toolkit** which provides detailed information on how public sector bodies recovering debt can understand, identify and support people who may have experienced or may be experiencing economic abuse.

With special thanks to the members of the Fairness Group Vulnerability Sub-Group who helped shape this toolkit, to Carol Campling and Grace Brownfield who led the development of it, to all the organisations who reviewed and fed into its content and to Chris Fitch, Vulnerability Lead (Money Advice Trust) and Research Fellow (Personal Finance Research Centre, Bristol University), for lending his expertise to this project.

If you have any feedback on the toolkit and how it could be improved, please contact the Government Debt Management Function.

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# A note on terminology

In this toolkit, we often use the phrase ‘vulnerable customers’. We have chosen to use this phrase as it is understood within debt management contexts across government organisations and wider sectors. However, we recognise that many individuals do not identify with the term ‘vulnerable’. We understand that often people become vulnerable to harm, not because of their own circumstances or characteristics, but because of the actions or processes (or lack of) of an organisation they are engaging with.

In customer-facing communications or interactions, we encourage organisations to think about their use of language, including ensuring this is as inclusive as possible. For example, referring to ‘customers who need additional/enhanced support’ or, talking about how you can ensure all customers can access your service regardless of any additional needs they may have. This also aligns with the approach we set out in this toolkit, where organisations should focus on what customers are vulnerable to, rather than the specific detail of a customer’s circumstance or characteristics.

# Defining vulnerability and understanding common harms

An organisation's starting point is usually to try and define vulnerability, or what a vulnerable customer is. The Financial Conduct Authority defines a vulnerable customer as, "someone who, due to their personal circumstances, is especially susceptible to harm, particularly when a firm is not acting with appropriate levels of care."<sup>1</sup>

It is important to recognise that anybody can be vulnerable and many people will experience some level of vulnerability at some point in their lives. The experience of vulnerability is diverse, and crucially vulnerability can be short or long term, recurring or permanent, and can change over time. Vulnerability may manifest itself at any point during a customer's journey.

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<sup>1</sup> Financial Conduct Authority (2021) [Guidance for firms on the fair treatment of vulnerable customers](#).



There can be many different causes of vulnerability and attempting to provide a strict definition in this context can be challenging.

It's true that many organisations find that having an overarching definition of vulnerability (such as the Financial Conduct Authority's definition shown on the previous page) is the most helpful approach, rather than trying to provide a strict definition of all the different causes and consequences of vulnerability. It is important to remember that what makes a customer vulnerable is not the same as what they are vulnerable to. Therefore, rather than spending too much time defining vulnerability on paper, the key question organisations should always be asking is "Vulnerable to what?". In other words, what detriment is the customer at risk of experiencing? This might be some form of loss, harm or disadvantage – as set out in some examples opposite.

As well as thinking about common causes of detriment, organisations should consider what the **common harms** are that their customers might experience. You can think about this in a debt management context – for example, how might their circumstance, condition or characteristic affect their ability to engage with the debt management process and/or their ability to repay or pay on time?

## Examples: Common harms

Harm	Potential causes (not exhaustive)
Making a decision not in their best interests (for example, because they don't understand the information given).	<ul style="list-style-type: none"> <li>• Mental health condition.</li> <li>• Dementia.</li> <li>• Memory issues.</li> <li>• Learning disability.</li> <li>• Effect of medication on comprehension.</li> </ul>
Having collection activity escalated because they were unable to engage with the debt management department (for example, they struggle to use the phone).	<ul style="list-style-type: none"> <li>• Speech difficulties.</li> <li>• Deafness.</li> <li>• Mental health problems.</li> </ul>
Financial loss – extra charges added to an account (for example, because they were unable to make payment in time).	<ul style="list-style-type: none"> <li>• Physical or mental health condition impacting financial situation.</li> <li>• Financial difficulty or low income.</li> <li>• Addictions and/or compulsive disorders (e.g. gambling).</li> </ul>
Causing physical harm to themselves.	<ul style="list-style-type: none"> <li>• Mental health condition.</li> </ul>

As the examples demonstrate, a particular harm could be experienced by people due to a wide range of reasons. However, what is most important is to understand the harm and act to stop that from happening. Thinking about common harms in this way will also enable you and your staff to help a much larger number of customers than by focusing on a single condition or driver of vulnerability.

For example, thinking about the common harm of 'difficulties with decision-making' rather than focusing on 'customers with mental illness' can help a firm to take action which will not only help people with mental health problems but also those who might be experiencing decision-making difficulties due to the side-effects of treatment for kidney failure, or where there are language or numeracy barriers to decision-making, or where a consumer has communication issues due to a stroke.



## How to put it into practice

As an organisation, you can create your own list of common harms to understand what your customers might be vulnerable to.

Some organisations have found it helpful to use this list to create a ‘Treatment/support matrix’ (see template below). This sets out the different types of support, flexibility and forbearance available to customers at risk from different harms. It can help you to ensure you have the right range of support in place. It can also be used by frontline staff during customer interactions, as a reminder of the support available to a customer, depending on their needs. You can find out more about the range of appropriate support that could be offered in the [Providing Appropriate Support](#) section.

		Presenting problem goes along here			
		Long-term ill health	Low cognition	Visual impairment	Bereavement
Treatment/support responses go down here	Offer call-back	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
	Summarise discussion/ agreed actions in writing	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
	Braille or large print communications			<input type="checkbox"/>	
	Temporary pause on collection activity	<input type="checkbox"/>			<input type="checkbox"/>

Use dots to indicate which presenting problems have which treatment options open to them.

The above are examples of what you could include in your treatment matrix. A full treatment matrix will be much larger and you may want to include categories/headers to make it as easy as possible for staff to navigate.

# Identifying vulnerable customers

Identifying customers who may be vulnerable to harm, and who may therefore need additional support, is crucial to securing good debt management outcomes. The earlier in the engagement that this is done, the better. Often, it may be difficult to progress with sorting a debt issue without understanding the challenges the customer faces, or the additional support they need to engage in the debt management process.

This section outlines the four key methods used in the identification of customers who may need additional support, alongside best-practice principles.



## Best practice checklist for identifying customers who need additional support ('vulnerable customers')<sup>2</sup>

### 1. An individual makes a direct or indirect disclosure.

An individual contacts your organisation and:

- makes a direct disclosure by either; call, letter, email, webchat, get help forms or other available channels:
  - “My circumstances are bad, can you help?”
  - “I’m not very well at the moment and am finding it difficult.”
- makes an indirect disclosure:
  - “I’m really struggling today, I’m so down.”
  - “I don’t understand you.”

Organisations should provide every customer the opportunity to self-disclose. Organisations should seek to operate multiple channels and routes which encourage customers to share information about their vulnerability and their associated needs.

Frontline and specialist staff (if your organisation has a specialist team) should routinely tell all customers that disclosing a vulnerable situation can potentially result in additional support being provided.

**Note:** It is not expected that staff can ‘solve’ wider challenges an individual is facing, but they should emphasise to customers that disclosing a vulnerability is a positive thing to do and will enable staff to better support them through the debt management process. For more information, see the ‘Providing appropriate support’ section.

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<sup>2</sup> Elements of this checklist are reproduced with permission from Chris Fitch, Jamie Evans, and Colin Trend  
– [Vulnerability: a guide for debt collection: 21 questions, 21 steps.](#)

Frontline staff should be trained to recognise 'cues' that indicate the customer may need support, including:

- individual factors:
  - passing mentions of illness, disability or impairment.
  - reference to contact with the health sector or social care sector.
  - reference to the receipt of specific benefits.
- behavioural cues:
  - sounding flustered, anxious, confused.
  - asking unrelated questions or asking staff to repeat themselves or put conversations in writing.
  - frustration can also be a sign someone may be struggling to follow the conversation, or is experiencing memory problems.
- wider circumstances
  - excessive or unusual expenditure.
  - life events (such as time in hospital, bereavement, income shocks).

- unstable housing situation (e.g. reference to staying with friends, unable to provide fixed contact details).
  - signs of abuse, including economic abuse (e.g. mention of a partner spending their income or creating debt, seeming to be taking instructions from their partner or having concerns about protecting their personal privacy or safety). For more information on economic abuse please see the GDMF Public Sector Economic Abuse Toolkit.
  - unexplained spending and / or budget showing a surplus or balanced budget, but customer not having enough money to keep up with commitments (could indicate problem gambling, or undeclared debt such as illegal money lender).
- organisational actions
    - reference by the customer to things that have or haven't been done that have caused difficulty.

Frontline staff should also be trained to recognise where customers are facing certain limitations which affect their ability to make decisions (See BRUCE Protocol).

## **2. A third party involved in the support of an individual contacts a firm to make a disclosure.**

This could be a carer, GP, debt advice administrator, or hospital, debt and mental health evidence forms.

Organisations should maintain procedures for receipt of third-party disclosures and develop links with local and national support services to ensure that third parties are aware of routes to provide disclosures.

## **3. An organisation uses internal data to identify a vulnerable or potentially vulnerable individual.**

Organisations should seek to leverage internal data sources to identify customers at risk of harm. This could be financial vulnerability triggers, such as missed payments or data on other support being received, for example, receipt of disability benefit or whether they receive local Council Tax Support.

When potential vulnerability is identified through this route, organisations need to consider and set out how staff should then raise this with a customer.

The accompanying toolkit for frontline staff [LINK] sets out questions and prompts to help frontline staff raise potential vulnerabilities with customers when the customer has not directly disclosed. These conversation aides can be equally helpful when a potential vulnerability is identified via internal data held by the organisation.

## **4. An organisation uses external data to identify a vulnerable or potentially vulnerable individual.**

Organisations should look to develop or purchase services which use Credit Reference Agency data and open banking or open finance data within tools and analytics services to identify customers in or at risk of financial vulnerability.

Organisations should look at creating data partnerships in and outside of their sector to proactively identify customers in need of additional support.

Organisations should look to technology to enhance how they identify vulnerability by using tools such as text and speech analysing software and third-party vulnerability referral forms/databases.

## Encouraging disclosure through written communications

As an organisation, you may be keen to use targeted written communications to encourage customers to get in touch with you, or to disclose any additional support needs that are affecting their financial situation. When considering how to do this, it's important to think about how you can:

- remind the customer that a disclosure is welcome ('send a signal').
- inform them of how they can make that disclosure.

It's important to remember that customers will have genuine and legitimate reasons for being reluctant to disclose. This might include:

- fear of judgement or not being believed.
- not thinking it will make any difference.
- concerns about how the information / their data will be used.
- not knowing how to disclose, or not being able to access the standard process for doing so (e.g. not able to ring to speak to debt management).

Think about how you can overcome these barriers. In written communications, or in information on GOV.UK, you could – for example – include detail which explains that you already help many customers who have disclosed support needs, and sets out how such disclosures can be made. Having multiple channels customers can use to disclose their circumstances and needs, for example by phone, letter, email and routinely giving people opportunities to engage will also help.

For online contact points, think about how you can make messaging about disclosure, and support available, clear in prominent locations across your website and on main account dashboards.

## Learning from other sectors

The Money and Mental Health Policy Institute, in collaboration with the Money Advice Trust, have developed a **series of three guides** looking at how to encourage, and respond to, disclosures from people with mental health conditions. It covers information on:

- encouraging disclosures and removing barriers to this
- how to respond effectively to disclosures, and what makes a 'successful disclosure' for both customers and the organisation
- processing and recording data about mental health conditions and balancing this with customers' rights and concerns about controlling data recorded about them

## Identifying and supporting customers experiencing economic abuse

Economic abuse involves behaviours that interfere with an individual's ability to acquire, use and maintain economic resources such as money, transportation and utilities. Economic abuse could present in public sector debt management in a number of different ways, including, but not limited to:

- individuals who are in debt because their abuser has built up debt in their name (for example, by claiming benefits).
- individuals who are unable to repay debt because an abuser takes their earnings, including from employment and benefits, or controls when and how their money is spent.
- individuals who are unable to access certain debt recovery mechanisms because their abuser insists all economic assets (e.g. savings, house) are in their name.
- an abuser putting bills in an individual's name and then not paying them, or not giving the individual money to pay them.

The GDMF Fairness Group have produced a dedicated **Public Sector Economic Abuse Toolkit** which provides detailed information on how public sector bodies recovering debt can understand, identify and support people who may have experienced or may be experiencing economic abuse.



## Case study

### **Utilising the vulnerability toolkit in staff training and development – Barking and Dagenham Homes and Money Hub**

The Homes and Money Hub (the hub) is a front facing service within the wider department of Community Solutions with the London Borough of Barking and Dagenham. The hub has multiple aims, including reducing residents' debts and giving them the support and skills to manage their finances.

Barking and Dagenham is the 13th most deprived borough in the country with over 10,000 households owing debt to the council. The hub only has a small team, yet demand is high, so the hub has become a targeted service particularly focusing on vulnerable people with multiple, complex debt.

The role of the hub is to identify what the presenting needs of the customer are, develop a plan together with the customer, deliver and then monitor the progress.

This has meant that the hub caseworkers need to build a trusting relationship with the customer which will enable them to get to the root cause of the problem.

Managers at the hub identified the Government Debt Management Vulnerability Toolkit as a useful development tool for staff working in this context. They used a staff development day to introduce the vulnerability toolkit to staff. Content from this was transferred into easily understandable slides, with a handy reference sheet for staff. Case studies were developed to support staff development too.

The session received positive feedback, supporting staff to use the tools and best practice from the toolkit. Going forward, the expectation is that line managers of caseworkers will continue working with staff giving advice and guidance in this area at case review meetings.

# Supporting conversations: Frontline tools

## Tools for supporting conversations<sup>3</sup>

Supporting staff to effectively handle disclosures of vulnerable situations, and to have conversations with customers about their individual circumstances, is crucial in going beyond merely identifying vulnerability to taking effective action.

There are a number of widely established tools that can help frontline staff to do this, some or all of which your organisation may already be using. Staff should be aware of and trained in how to use these tools to have effective conversations with customers. However, it is also important to remember that staff should ideally avoid sounding like they are reading from a script and use these as tools to guide conversations flexibly based on the customer's needs. For more information on these tools, please see the Toolkit for Frontline Staff.

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<sup>3</sup> These tools are reproduced with permission from Chris Fitch, Jamie Evans and Colin Trend – [Vulnerability: a guide for debt collection – 21 questions, 21 steps](#).



### **TEXAS (handling disclosures)**

Used for responding to a customer disclosing a condition or circumstances that means they may need additional support, and gathering the information you need from them to be able to help.

### **IDEA (gaining more information about circumstances)**

Used for gaining a more detailed understanding of the customer's situation in order to take effective action – this could include establishing whether changes need to be made to the usual debt collection processes or understanding what further support may be required.

### **CARERS Protocol (handling disclosures from carers)**

Used for handling disclosures from carers and third parties.

### **BLAKE Protocol (supporting suicidal customers)**

Used for managing disclosures of suicidal thoughts, for as long as a staff member needs to – for example, until they are able to make an internal or external referral following the organisations' individual suicide policy.

### **BRUCE Protocol (Supporting customers with mental capacity limitations)**

Used for identifying and supporting customers who may have difficulties with decision making, or have mental capacity limitations which affects their ability to understand, remember or 'weigh-up' information that is shared with them.

# Recording information about vulnerability

When a customer tells an organisation about a circumstance or support need(s), firms may want to store this as data to ensure that they can act on this need. This will also ensure that the customer does not have to keep repeating this multiple times – which can be a distressing experience.

As organisations will be aware, they must follow the legal obligations set out in data protection law, including having a clear legal basis for processing the data. Organisations also need to ensure staff are confident in knowing what data they need to record, why they need to record it and how it will be used – in order to communicate this clearly to the customer.

Many organisations have opted for an approach of recording the specific support need(s) rather than the ‘vulnerability’ itself. This is in line with the approach outlined earlier where the focus should be on what harm customers are vulnerable to and therefore what support they need to avoid this and to achieve good outcomes, rather than focusing on all the details of the condition or circumstance itself. When designing systems, organisations should consider how to ensure appropriate



staff are alerted to potential vulnerability issues, or support needs, while still respecting wider confidentiality and legal requirements that may mean this is not visible to all staff all the time.

## Learning from other sectors

**Vulnerability and GDPR:** The Money Advice Liaison Group and Money Advice Trust have produced a **set of guides** on Vulnerability, GDPR, and disclosure. The aim of the guides is to help data protection teams, staff working on vulnerability policy and operational leads to work together to address practical challenges related to GDPR and vulnerability.

**Encouraging, responding to, and recording mental health disclosures:** The Money and Mental Health Policy Institute, in collaboration with the Money Advice Trust, developed **a series of three guides** on how essential services providers can support more people with mental health problems to disclose their condition. In relation to recording, specifically, the guides set out that every firm should:

- know its reason or purpose for recording data from mental health disclosures.
- ensure that staff know and can give clear and accessible explanations to consumers about how their disclosed data will be recorded, stored, used, shared and processed.
- understand the foundational GDPR principles and individual rights and communicate these to consumers – where appropriate in a disclosure – to ensure fairness and transparency.
- fully understand the definitions, strengths and limitations of the lawful processing bases that can be used to process data from a consumer mental health disclosure.
- ensure that – alongside operational objectives and legal considerations – the consumer voice and experience are taken into account when deciding upon a lawful processing base.”<sup>4</sup>

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<sup>4</sup> Reproduced with permission from – [Recording Disclosure: Processing data from consumer mental health disclosures](#). Chris Fitch, Dan Holloway and Conor D’Arcy; Money and Mental Health Policy Institute and Money Advice Trust.

# Providing appropriate support

Identification is just one part of helping customers. How organisations then respond to a disclosure is what really matters. Organisations need to ensure that they give customers appropriate support and flexibility, to help them achieve a positive outcome.

Organisations should have a clear and comprehensive suite of possible support, flexibility and forbearance available, and staff should be aware of, and empowered to offer this to customers.

Exactly what support or flexibility is available and offered will depend on the organisation, the type of debt and the individual customers' needs. However, some common adaptations and forbearance that organisations may need to offer include:



Communications	<ul style="list-style-type: none"> <li>• using the customer's requested method of communication (including shifting channel from default method as needed).</li> <li>• using plain English and plain numbers in communication.</li> <li>• frontline staff taking greater time to explain and check understanding.</li> <li>• providing summary of conversations and agreed next step in writing for customer.</li> <li>• providing adjustments required by the Equality Act (e.g. large print or text service for people with hearing difficulties or speech difficulties).</li> </ul>
Forbearance	<ul style="list-style-type: none"> <li>• allowing people longer to pay.</li> <li>• waiving late fees or charges.</li> <li>• adjusting payment rates and repayment plans.</li> <li>• payment breaks.</li> <li>• putting the account on pause/hold (e.g. until circumstances stabilise or while customer seeks wider support, including debt advice).</li> </ul>
Processes	<ul style="list-style-type: none"> <li>• offering a call back or using 'staged advice' to make it more manageable for the customer.</li> <li>• allowing more time between debt collection stages or before escalation to the next stage.</li> <li>• exempting customer from certain collection methods not appropriate for their circumstances (e.g. bailiff action).</li> <li>• freezing automated letters or phone calls so customer is communicated with in a more tailored way.</li> </ul>
Expert support	<ul style="list-style-type: none"> <li>• referral to internal support team.</li> <li>• signpost/referral to external support (e.g. debt advice, foodbank, housing advice, gambling support).</li> <li>• working with an authorised third party who is also supporting the customer.</li> </ul>

To help you think about the adaptations and support that might be needed, it may be useful to think about these four questions:<sup>5</sup>

- What actions do we usually take for a customer?
- What specific health, financial or other factors need to be taken into account for this customer?
- What reasonable adjustments could we make to take these factors into account? This includes adjustments suggested by the customer.
- If making adjustments, what needs to happen now (i.e. while speaking with the customer), directly afterwards, and over time?

You can use the answers to these questions to develop your Treatment/support matrix (as highlighted in the **Defining vulnerability and understanding common harms** section). This sets out the different types of support, flexibility and forbearance available to customers at risk from different harms. It can help you to ensure you have the right range of support in place and can also be used by frontline staff during customer interactions, as a reminder of the support available, while still ensuring this is always done on an individual basis.

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<sup>5</sup> Questions reproduced with permission from Chris Fitch, Jamie Evans and Colin Trend – [Vulnerability: a guide for debt collection – 21 questions, 21 steps.](#)



## Designing inclusive services

To further improve outcomes for vulnerable customers, organisations can consider how to make services more inclusive as a default. This is often known as ‘inclusive design’.

We know not everyone who has an additional need, or vulnerability, will disclose this. Designing inclusively means they can still access and engage with debt management processes, regardless of whether they disclose or not. It also typically means things work better for people without additional needs, leading to higher customer satisfaction all round.

“Inclusive, accessible services are better for everyone. For example, using simple words helps people who are in a hurry as well as people who have a learning disability.”

– Government Digital Service, Service Manual,  
Service Standard

Typically, designing inclusively means working with people to understand their needs, identify problems and design solutions, and using agile methods to continually seek out feedback and make improvements.

The Government Digital Service **Service Standards** and **Service Manual** provide a range of guidance on how to develop inclusive services and how to implement this in the context of your individual organisation and function.

# Signposting

Some customers may be in difficult or extreme crisis situations that are not appropriate or possible for an organisation to resolve. These customers can often benefit from the support and services supplied by third-party organisations. Establishing signposting and referral partnerships with local and national charities, organisations and other service providers is key to providing holistic support to customers in difficult situations.



## Best practice checklist for signposting vulnerable customers<sup>6</sup>

### 1. Empowering staff

- Referral procedure in place for staff to follow.
- Staff are confident in acknowledging where the customer's situation falls outside of the scope and expertise of their organisation.
- Staff have up-to-date information regarding the referral partner.
- Staff can explain what support the organisation can provide and what the potential benefits for the customer are relating to their specific needs.
- Where possible, a warm referral should be made and customers supported and empowered to access the support in a way that works well for them.

### 2. Establishing partnerships

- A wide-ranging set of partnerships in place to facilitate a full range of services to cater for varying and complex customer needs (e.g. debt and money advice, support for those experiencing mental health problems, gambling, illness, homelessness etc.)
- A dedicated person directly manages the relationship with third-party organisations – that individual holds regular review meetings to discuss referral volumes, outcomes and opportunities to work in partnership to support specific cohorts of customers.
- Referral partners are not treated like suppliers and partnership visits are not viewed as audits.
- Remember that there may be times when you need to liaise directly with third parties representing customers, for example, an individual experiencing economic abuse may ask you to liaise directly with a support worker or specialist debt adviser and you may want to consider whether you can do this – for more guidance see the GDMF Public Sector **Economic Abuse Toolkit**.

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<sup>6</sup> Elements of this checklist are reproduced from the Money Advice Service – [Working collaboratively with the debt advice sector: A strategic toolkit for creditors](#), and Chris Fitch, Jamie Evans and Colin Trend – [Vulnerability: a guide for debt collection – 21 questions, 21 steps](#).

### **3. Monitoring success**

- Regular reporting on the outcome and success of referrals.
- Regular 'call calibration' sessions held with third-party referral partners including reviews of the full end-to-end customer journey.
- Examples and case studies from individuals in vulnerable situations are shared to help identify areas of weak and strong practice and establish how the organisation is perceived by customers living with a particular condition or situation.

# Helping people access money guidance

**MoneyHelper** is backed by government and is a free service provided by the Money and Pensions Service (MaPS). MoneyHelper helps people to make the most of their income, find out about entitlements, plan ahead for major purchases, reduce spending where possible and to know the different options available to them. The MoneyHelper website contains a range of information to help people manage their money and access further support when needed, including specialist debt advice.

MoneyHelper is ideally placed to support customers that are struggling with bills and commitments but have not yet fallen into arrears (pre-arrears). There are vast resources on MoneyHelper, but more targeted signposting to the following may be beneficial:

- **Budget Planner:** helps people to build a budget, know exactly where money is being spent, and know what they have got coming in. The tool gives users a place to record their spending, a breakdown of finances by category and personalised tips to help make the most of their money.



- **Money Manager for Universal Credit claimants:** Money Manager is for people on Universal Credit. They can use it when making a new claim or moving to Universal Credit from existing benefits. It helps claimants to make the most of their money when waiting for their first Universal Credit payment and builds a personal guide based on individual circumstances.
- **Bill Prioritiser:** this tool helps people that are struggling with bills and payment commitments but have not fallen into arrears. The consequences of missing some types of bills can be more serious than if you fall behind on others. The MoneyHelper Bill Prioritiser helps people to put bills and payments in the right order and if they are struggling to pay, it will tell them what to do before they miss a payment.
- **Debt advice locator tool:** the MoneyHelper Debt Advice Locator can help people to find telephone, online and face-to-face debt advice near them.

## Contacting MoneyHelper

People can contact MoneyHelper for free and impartial money guidance – 0800 138 7777 (Monday to Friday, 8am to 6pm)

- MoneyHelper Typetalk support – 18001 0800 915 4622
- MoneyHelper WhatsApp live chat – 0770 134 2744

They can also call MoneyHelper for free and impartial pension guidance – 0800 011 3797 (Monday to Friday, 9am to 5pm).

MoneyHelper is particularly useful for customers that are struggling with bills and commitments but have not yet fallen into arrears (pre-arrears). Where a customer's financial situation is more severe, a referral to debt advice should be considered. Many central and local government organisations use the Money and Pensions Service Money Adviser Network to refer customers to debt advice, and organisations can also establish referral partnerships directly with debt advice agencies.

# Supporting staff resilience

## Supporting staff<sup>7</sup>

Working with customers in vulnerable situations can have an impact on staff member's wellbeing. Whether through a single event, like managing a call with a customer who is grieving or suicidal, or through repeat exposure to the effects of illness, abuse, addiction and even situations involving children – these encounters can affect staff emotionally, physically and professionally.

Staff may emotionally invest in cases and may be discussing circumstances that resonate with them personally, which can make it difficult to switch off. The challenging nature of this work means it has the potential to lead to stress, work-related anxiety and burnout. Disclosures may also be triggering for staff, who may recognise some of their own experiences in customers' situations. For example, a staff member receiving training on, or supporting a customer experiencing, economic abuse may lead to them recognising their own experiences as abuse, and needing support to deal with this.

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<sup>7</sup> Elements of this best practice are reproduced with permission from Chris Fitch, Jamie Evans and Colin Trend  
– [Vulnerability: a guide for debt collection – 21 questions, 21 steps.](#)



Burnout is often particularly seen where staff are hearing disclosures but don't feel they are able to do anything to support the customer, so empowering staff to offer support and adjustments is also key to supporting their wellbeing – see the **Providing appropriate support** section.

## **Best practice that organisations should consider to support their staff**

### **Training**

- Staff should receive appropriate training so that they are equipped with the skills, strategies and techniques to work effectively with customers in vulnerable situations. This should complement training about specific issues customers experience, for example, different types of mental health conditions. However, awareness raising about vulnerability issues alone is not sufficient.
- Staff should also have the opportunity to share knowledge and experiences with other colleagues.

### **Organisational recognition**

- The potential negative impact on staff should be acknowledged and addressed by the organisation. It should not be viewed as simply a part of the job that staff must accept.

### **Individual support**

- In addition to regular one-to-ones, staff should be able to raise problems with line managers.
- Organisations may also provide access to an employee support programme or other confidential counselling service.
- Offering the opportunity for staff to debrief after a difficult call is crucial. It's important not to underestimate the power of debriefing – especially if staff are working from home and may not have the chance to casually debrief naturally with colleagues in the office.

### **Team support**

- Team members can be a positive source of support for one another. It is important that teams be given the opportunity to have a debriefing session after any serious event and run team case reviews.

### **Peer support**

- Staff should have one-to-one discussions with colleagues and/or managers to debrief by sharing their experiences and concerns.



## Management support

- Managers should regularly speak directly with their staff to understand the challenges they are dealing with and identify when additional support is needed. Regular conversations will also help managers to recognise changes in their staff's behaviour which might suggest they need help.
- Managers should also give staff the flexibility to take time out after a particularly difficult conversation.

### Examples: Supporting staff with difficult calls and interactions

While the exact support needed will vary depending on the nature of your service, below are some examples of good practice we have gathered from different organisations.

#### During a call or interaction:

- supervisors/managers can listen in to provide live support (if technology allows) or provide support to the adviser on call, for example through Microsoft Teams chat
- supervisors/managers research something on behalf of the staff member (e.g. details of a referral organisation for them to then share with the customer)
- empower staff members to arrange for a supervisor/ manager to call the customer back, depending on the situation

- empower staff members to adjust the typical process to work best for both the customer and staff member, where a call is particularly challenging

#### After a call or interaction, supervisors/ managers can help staff by:

- suggesting or responding to a request for time to de-brief with them or to take time out
- agreeing time for appropriate sharing with a colleague
- supporting the staff member to contact an employee support programme where this may be appropriate

# Monitoring and continuous improvement

Monitoring outcomes for customers who are vulnerable to harm is critical in understanding where your policies and processes are working well, and where there are areas for improvement.

Outcomes should typically be thought of in terms of the impact on the customer and their situation. An outcome can be either a change (something happened) or no change (nothing happened) that flows from a specific firm action, policy or intervention. When thinking about outcomes, it is useful to consider what you want to achieve for your customers, as well as what you want to avoid (e.g. difficulty accessing your service, over-indebtedness or financial difficulty).



In its recent Vulnerability Guidance, the Financial Conduct Authority set out how having clear monitoring and feedback strategies allows organisations to identify where:

- they do not fully understand vulnerable customers' needs

- the performance of staff has led to poor outcomes for vulnerable customers
- services (or processes) unintentionally cause harm to vulnerable customers
- customer service processes are not meeting vulnerable customers' needs<sup>8</sup>

## Tracking customer outcomes: Sources of insight

The **Financial Conduct Authority Vulnerability Guidance** also sets out a number of different sources that organisations can consider using to track outcomes for vulnerable customers, such as:

- speaking with frontline staff, and enabling them to feedback honestly when they think processes for vulnerable customers could be improved
- user testing – including testing vulnerable customers' experiences of services and

processes, for example through mystery shopping, focus groups and auditing

- using insight from organisations representing customers who may be in vulnerable circumstances, including reviewing published information, data and evidence
- complaints data (but only if you can be confident the complaints process is easy and accessible for vulnerable customers to use)

<sup>8</sup> Financial Conduct Authority (2021) [Guidance for firms on the fair treatment of vulnerable customers](#).

As part of the strategy for tracking the experience and outcomes of vulnerable customers, organisations should identify key management information (MI) indicators that they need to monitor. Exactly what MI you need to collect and monitor, and how frequently, may depend on your exact organisation and the debt collection work you undertake, however there are some common things to think about which can help you design your approach.

**Define your objectives** – Think about what you're trying to achieve from your monitoring process; for example this might be tracking how outcomes for vulnerable customers compare to customers more generally. You may want to make sure that your monitoring process enables you to identify difficult, unresolved or emerging issues on vulnerability in a timely way. You may want to also use it to track the impact of recent training or new initiatives.<sup>9</sup> Having clear objectives will help you identify the best MI and other sources of data/insights to monitor.

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<sup>9</sup> For more information and suggestions on potential objectives for monitoring experiences of vulnerable customers, see pages 83 and 84 of [Vulnerability: a guide for debt collection](#) by the Personal Finance Research Centre and Money Advice Trust.

**Ensure that MI is utilised effectively** – In order to be effective, any MI you use needs to be:



**Follow the principles for good MI** – ensuring that it is:

<b>Accurate</b>	The correct numbers with any commentary contributed by the right people.
<b>Timely</b>	Available sufficiently quickly after the relevant business activity to enable managers to act.
<b>Relevant</b>	Displaying what a manager can directly influence or escalate to someone who can take the necessary action.
<b>Consistent</b>	Consistent on period-to-period basis to allow managers to spot trends and make sound decisions.

## Tracking outcomes for vulnerable customers: Potential MI to monitor

As set out above, the exact MI an organisation needs to monitor may vary. However, below is a list of examples of MI that can be used to track experiences and outcomes for vulnerable customers – sourced from existing good practice by government organisations and best practice from other sectors. Some of this may be information you already collect and monitor. In which case, segmenting it by vulnerable customers specifically can help you identify any areas in which vulnerable customers are receiving worse outcomes, or where processes may not be fully accessible. Potential MI to monitor include:

- repayment plans – successful completion rates, breakage rates
- engagement rates – response rates to communications (particularly via different channels to identify any differences and any potential barriers or more successful methods); drop-out rates at different stages of the debt collection process
- additional support – contact rates with vulnerability teams, referrals to specialist services
- use of different debt collection methods – including rate of use for vulnerable customers, compared to other customers
- forbearance applied to customer accounts – split by customer type where possible to identify trends and whether forbearance is being utilised where needed
- customer feedback – both formal and informal
- complaints data (including rate of complaints from vulnerable customers compared to other customers, although this is only an effective measure if you can be confident the complaints process is accessible to all customers)