



**TRUSTMARK**  
Government Endorsed Quality

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# Consumer Vulnerability Policy





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# 01

## **Purpose of the Policy**

The purpose of the Consumer Vulnerability Policy is to set out our approach to supporting consumer vulnerability. We want to ensure we deliver inclusive services and support all consumers through every part of their consumer journey in every part of the organisation. As an organisation we are committed to ensuring our consumers get what they need from us and will make reasonable adjustments to support them to access our services.



# 02

## What is Consumer Vulnerability?

There are complex reasons why a consumer may find themselves in a vulnerable situation. Consumers can easily move in and out of periods of situational vulnerability, and this can affect a consumer's ability to make the right choices for them at that moment in time.

The change in marketplaces has provided a further opportunity for consumers to experience vulnerability. Inexperience and a lack of familiarity with marketplaces has contributed to many ways for consumers to experience vulnerability.

**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 an increased 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.**

**Vulnerability is a spectrum of risk; all consumers are at risk of becoming vulnerable.**

The non-exhaustive list below highlights some things, that could indicate consumer vulnerability.

**Health:** Any disability, impairment, illness or age-related conditions, and additional needs.

**Life events:** Major life events such as bereavement, redundancy, retirement, loss of income, divorce, or a relationship breakdown.

**Resilience:** Difficulty in enduring financial or emotional shock caused by debt or a one-off unexpected expense; lack of support in the family and friend networks, or a disempowered status.

**Capability:** Low education and/or financial capability and experience of managing money; lack of digital skills and/or access; or another barrier to learning such as disadvantage, inexperience, English as a second language, or additional educational needs.

Whatever the reason for the vulnerability, as an organisation we are committed to understanding and supporting ALL consumers in getting the best outcomes and getting exactly what they need from us.



# 03

## Our commitment

At TrustMark we are committed to supporting ALL consumers, but we are aware that some consumers may need additional support during their consumer journey. We aim to ensure every consumer is supported by ensuring consumer-facing staff are well trained, knowledgeable, friendly, and helpful.

Customer-facing staff will be trained in consumer vulnerability and have a greater awareness and understanding in what causes consumer vulnerability, how to identify it and how to support consumers where vulnerability has been identified.

By raising the profile of consumer vulnerability within TrustMark our customers should receive the extra support, time, guidance or whatever they need to ensure they get the best outcome for them and are supported.

## What will we do to support ALL consumers?

At TrustMark our commitment as an organisation and to our consumers means we will endeavour:

**To ensure staff are aware of this policy and are effectively trained, all members of staff are expected to regularly refer to this policy and ensure that they understand it. If staff are uncertain about how any of the requirements of this policy apply to their role they should speak to their line manager in the first instance for additional guidance.**

**To support all consumers, no matter the vulnerability shared or identified, by:**

- Considering content and method of communication, have we got it right for our consumers?
- Not making assumptions about consumers.
- Asking the consumer what they need and how you can help them better.
- Considering if there is a need to prioritise or expedite our response and request the same of partner organisations.
- Clearly setting out what we can and what we cannot do.
- Treating consumers with empathy and respect.
- Being patient and not rushing consumers.
- Checking for understanding.
- Trying to communicate in plain English.
- Striving for an inclusive service, which supports ALL consumers.



**To only record and hold relevant information and data about consumers in line with our [Privacy Notice](#). If you share something with us, that may be currently affecting you. We will aim to use the below best practice model.**

# 04

## TEXAS Model

We will always aim to adopt the TEXAS model.

- T** Thank the consumer
- E** Explain how the information will be used
- E**Xplicit consent should be obtained
- A** Ask the consumer questions to get information
- S** Signpost if internal/external specialist help is needed

**We will** provide a simple way of reporting any situation where a consumer believes that TrustMark are not acting in line with this policy.

**We will** listen to ALL feedback and make any changes we can to ensure we continue to improve and support consumer vulnerability. We will review any complaints and make appropriate changes and consider any organisational blind spots.

**We will** listen and support ALL staff and develop a supportive workplace, but also listen to feedback to ensure all areas of the business are acting in line with this policy.

At TrustMark we recognise that consumer vulnerability is fluid, people can move in and out of periods of vulnerability. We positively encourage feedback on things we could do to improve in our support of ALL consumers.

### Further support & guidance

If you need additional support, please [contact us](#).





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