



Framework: Developing a vulnerable customers policy for internal use

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# Introduction

“As businesses and organisations became more conscious of the needs and requirements of vulnerable customers / donors within their communities, there is a need for each organisation to develop a policy to define who that audience is and how the organisation will take account of their need.

The DMA’s pedigree in recognising and supporting the needs of vulnerable customers through its responsible marketing foundations, made it the natural place for organisations to turn to for help in developing a policy.

The Vulnerable Consumers Taskforce, which is comprised of representative members from across the commercial and charity sectors, has created this framework to aid organisations when creating their policies.

The framework provides both structure and flexibility and will encourage organisations to tackle the key questions that will require consideration. The framework was then road-tested by members of the task force from the commercial and charity sectors.

We would like to thank Matt Radford (Maggie’s Centres), Louise Wright (BBC), Marie De Gannes (Centrepoint), Virginie Kan (World Animal Protection), Richard McStraw (DMSR consulting), Guilliana Castle (Centrepoint), Peter Galdies (DQM GRC), Lorna Tyldsley (Royal London), Julie Atherton (Small Wonder) for their dedication and commitment to deliver a practical resource which can be used by any organisation when creating or refining its vulnerable customer policy.”

Jacqui Crawley (KMB) and Elaine Lee (ReynoldsBusbyLee) - Co-chairs of the Vulnerable Consumers Taskforce.



# Policy Development Guidance

The DMA's Vulnerable Taskforce identified that organisations were struggling to create policies to better support the needs of customers in vulnerable circumstances.

As a result, employees and managers were finding difficulty in delivering appropriate and consistent service and believed that they were failing this customer group. In addition, this lack of clarity and consistency were creating a potential harm to individuals and brand reputations.

The Taskforce recommends that an internal policy is created first to ensure that all the processes and policies, required to support these customers, are in place before a commitment is made to external customers to avoid confusion and disappointment.

Once the internal policy has been created and implemented, the Taskforce recommends that a customer facing policy should also be created and made publically available for your customers and prospects to access.

This framework has been developed to help organisations to create an internal policy for handling contacts with customers in vulnerable circumstances. The framework provides practical guidance on the steps to follow and the considerations to make as the policy is created and implemented for your organisation.

The framework has been created by direct marketing professionals working across industries and sectors to ensure that it is a universally applicable tool. During its development, the framework has been successfully used by both commercial and charity organisations to create their own internal policies.

The framework has been designed to be flexible so that it can be adapted to suit the needs of each individual organisation:

- Layout should be considered throughout to aid scanability/understanding and improve information retention
- This includes formatting (variations in font size, colour and boxed sections to draw attention to key pieces of information)
- Examples should be used where relevant to illustrate or communicate confusing, difficult or not immediately obvious pieces of information
- Each Organisations definition of vulnerability will differ based on their operation, sector, approach and culture. The important thing is that each organisation defines vulnerability and agrees this collectively.
- Guidance notes to follow are highlighted in yellow for users to amend as / where applicable

The examples that follow are there to prompt debate and provide a framework within which to position your own policy.

# Draft internal vulnerable customers policy

## Executive Summary

FOR EXAMPLE: [Organisation X] recognises that some customers we come into contact with will be vulnerable in the context of how we interact with them, by virtue of their personal circumstances. As a provider of [insert nature of services], we have a duty and obligation to ensure that all elements of our work are consistent with our [e.g. mission statement/values/charter or similar], and that we make reasonable adjustments and put in place appropriate additional support mechanisms to take account of these needs and to ensure such customers/members of the public/supporters are not at risk of undue detriment.

[Additional optional standardised wordings]

[If wanting to state who is covered by the document:]

This report is intended for use by Internal Staff/Third Parties (shortened version) and is designed to ensure that [we] meet(s) not just our legal and regulatory requirements, but also the codes of the professional bodies to which we are members and the Ethical standards that we set ourselves as part of our company values [REFERENCE SOURCE].

[If wanting to include statement reference values:]

Because of our values, [Organisation] is committed to ensuring anyone who interacts with all consumers, its staff and volunteers working with [children or] vulnerable individuals will take all reasonable measures to ensure that the risks of harm to welfare are minimised and that they are treated fairly. This will be done through adherence to this policy and by ensuring the practice of safe recruitment in checking suitability of staff and volunteers working with children and vulnerable adults.

[If wanting to include statement of commitment]

[Organisation] is committed to providing appropriate support to vulnerable customers and this forms part of [Organisation's] wider commitment to ensuring our services meet the obligations of [insert most relevant obligations, e.g. Equality Act 2010, Charities legislation etc.].

[If wanting to include state purpose/aims of policy]

This policy aims to [delete amend as appropriate]:

- Provide guidance for staff on how we define and identify a vulnerable customer
- Outline the processes we have in place to help support vulnerable customers.
- Outline roles and responsibilities in relation to vulnerability and how we will oversee compliance in this area.

# Our Population and Vulnerabilities



UK population(2015) is estimated to be 65.1 million



850,000 people are (estimated to be) living with dementia in the UK



Major depression affects around 1 in 10 of the general population at any time



6,188 suicides registered in the UK in 2015. This is over 16 a day.



One in six of the population has some form of hearing loss



Over two million people in the UK are living with sight loss (2015)



Around 100 people each week are diagnosed with MS



There are an estimated 10 million people in the UK suffering from arthritis



It's estimated that up to 1 in every 20 people in the UK has some degree of dyslexia



32% of all people aged 65+ in the UK live alone (3.64 million people).



Every day 150 families in Britain become homeless



Almost 822 cancers were registered per day (2015)



## Definitions

**“Vulnerability”**: Types of vulnerability vary widely, for example someone could be vulnerable by virtue of being a young person with autism living independently for the first time, to a single parent with dependent children who has recently become unemployed, to someone with a terminal illness.

**“Vulnerability”**: Can be permanent, transient or progressive.

Whilst it is very difficult to define, [Organisation] is likely to consider someone to be vulnerable when:

“Their personal circumstances and characteristics mean they are significantly more likely than an average person to suffer detriment in connection with how [Organisation] deals with them, or where that detriment is likely to be more substantial”.

**“Customers”** – whilst this policy title refers to vulnerable “customers”, this should be taken to include all individuals who [insert description of what is meant by customers, users, or similar]

[Alternate standardised wording defining vulnerability:]

For the purposes of this policy we consider A vulnerable adult to be a person aged 18 or over who has:

- A learning or physical disability
- A physical or mental illness, chronic or otherwise including an addiction to alcohol or drugs
- A reduction in physical or mental capacity
- A dependency upon others in the performance of, or a requirement for assistance in the performance of physical functions
- Severe impairment in the ability to communicate with others
- Impairment in a person’s ability to protect him or herself from assault, abuse or neglect
- A person deemed not to display the mental capacity to make informed decisions

[If policy covers children:]

For the purposes of child protection legislation the term ‘child’ refers to anyone up to the age of 18 years  
[[For the purposes of child protection legislation]reference source:]

[Additional optional wording if wishing to define what constitutes a vulnerable situation]

An adult or child in a potentially vulnerable situation as someone whose situation includes:

- Physical and mental medical conditions
  - Disability
  - Learning difficulties
  - Times of stress or anxiety (e.g., bereavement, redundancy)
  - Financial vulnerability (where a gift from a customer may impact on their ability to sufficiently care for themselves or leave them in financial hardship)
  - English not being the customer’s first language
  - Influence of alcohol or drugs
- [IOF treating customers fairly]

## Summary

### Examples of Definitions:-

International Federation of Red Cross and Red Crescent Societies

“Vulnerability can be understood as diminished capacity of an individual (or and interconnected group) to anticipate, cope with, resist and recover from the impact of significant or even everyday events”

### East Cambridge District Council

“A vulnerable person is someone who is, or may be, in need of support due to age, illness or a mental or physical disability. Who is, or maybe unable to take care of himself/herself or is unable to protect himself or herself against harm or exploitation”

### Age UK

“Vulnerability is not something that affects other people. Any of us, at any time, could need care and support”

The definition of a ‘Vulnerable Person’ within this document covers:

- A child
- Someone who falls beneath the classification of a ‘vulnerable adult’
- Someone in a situation causing vulnerability, i.e. in a ‘vulnerable situation’

## Scope

This policy is relevant to considering the needs of your customer audience.

This Policy applies to [Organisation] and [delete as applicable] to the following service partners:

- E.g. subcontractors such as contact centre provider
- [Optional wording] The following service providers are not required to comply directly with this policy but are expected to have their own policy in place which does not have any areas that conflicts with this policy.
- E.g. Other suppliers who provide less core services.

This policy does not deal with:

- [List anything excluded e.g. potentially children if covered by a separate safeguarding policy, or staff if staff bullying/harassment covered elsewhere]

## Relevant guidance and legislation

[Confirm here if any specifically relevant guidance or legislation relating to vulnerability applicable to your sector or other relevant legislation. For example this could include:

- FCA Guidance requiring organisation to have in place and adhere to its own policy for managing vulnerable customers.
- The Public Sector Equality Duty (PSED) under the Equality Act 2010.
- General Data Protection Regulation – this supersedes the Data Protection Act 1998 and must be considered regarding collection, processing, retention, security and disclosure of data relating to customer vulnerability.
- Regulation/Guidance applicable to the charitable sector.
- Mental Capacity Act – See appendix 2



## Key principles

Insert key principles relevant to your organisation. Some examples you might wish to pick and choose from or use to prompt your own are included below. Some are generic, others may be applicable to certain types of organisations but not others.

- [Organisation] works on the general principle that we will take appropriate steps to consider the circumstances of any individual who is particularly vulnerable or susceptible to detriment and therefore needs either:
  - Adjustments to the way in which we communicate and support them
  - Special consideration in the context of enforcement and prosecution actions.
- [Organisation] recognises that vulnerability is a state not a trait, that there is a sliding scale of vulnerability, and that people are different, meaning that some customers will become vulnerable in circumstances where others may not.
- [Organisation] believes the welfare of any vulnerable person [or child] is paramount; those who are vulnerable without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality or beliefs.
- [Organisation] works on the basis that every individual is different, has different circumstances, and therefore may need consideration. This means that as far as possible, we will treat individuals in a way that is appropriate to their needs, where possible tailoring our approach.
- In some cases, we may where appropriate need to adopt an approach for dealing with certain categories of vulnerable customers or vulnerable customers who despite having different circumstances may be appropriate to follow a similar treatment path.
- We have a number of processes and tools in place to facilitate this and each of these are covered in more detail under 'How [Organisation] can support vulnerable customers below'.
- [Organisation] expects its own and its subcontractor's staff who come into direct contact with members of the public as part of their job to carry out appropriate selection and vetting procedures, including where appropriate basic criminal record checks.
- [Organisation] takes any complaint about treatment of vulnerable customers very seriously and any such complaint will be investigated fully. If appropriate [Organisation] will liaise with relevant law enforcement agencies.
- This policy should be circulated and made public as appropriate.

# How [Organisation] will support Vulnerable Customers

[Organisation] has in place a range of services and processes to support customers. Some of these are aimed at people with disabilities who may well not be vulnerable, but form part of our wider suite of support for customers who need us to do things a little differently. The services we can provide are summarised in more detail below:

*[These services will vary considerably from organisation to organisation to organisation but the types of service you may wish to reference could include]*

**Alternative formats** – whilst many customers who need reasonable adjustments will not be vulnerable, we recognise that for some customers a disability such as being blind means we need to communicate with that customer in a different way. This may include providing communications in large print, Braille or audio format.

**Text phone and Minicom** – as with alternative formats, these services are available to customers to help them communicate with [Organisation]. These services act as a conduit to transmit a message between [Organisation] and the customer in a way that is accessible to the customer.

**Language Resources** – we recognise that a language barrier, particularly when combined with other factors such as age or social isolation, may lead to individuals being unlicensed and potentially vulnerable. [Organisation] offers a number of language resources: [Might include]

- Translation/Interpretation service.
- Leaflets or literature available in other languages

**Easy Read** *[resources written to be for a low reading age, e.g. for people with learning difficulties & the average reading age in the UK is 9]*

**Web accessibility** – *[Not directly linked to vulnerability but you may wish to reference any guidelines your website complies to, such as the W3C guidelines, or any specific steps you have taken to make your site accessible.]*

## Reasonable Adjustments process

*[if you have such a process you may wish to outline how the process works and how it can be accessed]*

- [Organisation] has a process in place to identify, consider, and where appropriate put in place a range of adjustments for customers who may need them. This process is particularly important given each customer's circumstances are different and allows us to consider the individual needs circumstances.
- [insert other relevant detail as appropriate]

## Stakeholder engagement programme

- *[Outline any relevant stakeholder relationships and how they can support vulnerable customers.]*
- *[Outline how the organisation signposts to vulnerable customers across all communication channels].*

## Debt management

- *[If applicable you may wish to outline how the organisation deals with vulnerable customers with ref to debt management, referencing for example any special procedures in place to support customers in debt management. ]*
- *[As the FCA guidance on vulnerability covers debt management this could be referenced.]*

**Advisors helpline** – (insert contact detail if applicable)

**Customers at immediate risk of harm** *[you may wish to cover less usual scenarios where customers are at risk of immediate harm and identify procedures in place to deal with those. For example, this could include suicidal customers, customers at risk of domestic violence, or customers living in refuges. Below is some wording that provides some examples of the kind of scenarios you might wish to consider.]* Sometimes [Organisation] comes into contact with customers who are at immediate risk of harm, either to themselves or from others therefore procedures are in place to deal with this. Whilst such cases are very rare, consequences can be serious and [Organisation] will ensure it takes appropriate steps to mitigate the risk of harm. Scenarios include:

- **Threats of suicide** – occasionally we encounter customers who indicate they are suicidal. Advisors are trained that if they believe there is an immediate risk that a customer may harm themselves they must take prompt action. There is a procedure in place to deal with this which may include passing the details of the customer to the emergency services to enable them to assist.
- **Customers at risk of Domestic violence** – if a customer notifies us that their domestic circumstances are hostile we can recommend additional safeguards that can be put in place on their account.
- **Refuges** – If we are notified that a particular site is a refuge or safe-house, there are a number of steps we can put in place to ensure any contact with that site is appropriately managed.

**Dementia Friends** – *[many organisations have staff who have trained as Dementia Friends. Some may be Dementia Champions who can train others in the business. If you provide this, you could cover it here]*

## Resources

[Organisation] [And its partners] are committed to implementing, monitoring, maintaining and evaluating this policy. With regular reviews and updates re-issued. This includes the allocation of budget to support implementation of the policy, for example:

- Training *[this may be internal and/or external training. For example the DMA offer workshops (which may be chargeable for members and non-members with free training materials available at dma.org.uk. Other training providers are available in your local area.)*
- Additional FTE taking into account additional time taken to provide a more tailored service to these customers.

## Staff Support

- Whether before, during or after an incident involving a [child or vulnerable person], if you have any queries or uncertainties you should always consult your line manager or the [staff member]. They will be able to provide dedicated support and one of these members of staff support should always be available within working hours, or have a qualified member of staff available to address queries in their absence.
- If dedicated training of resourcing is required to reasonably and practicably support effective adoption of this policy within projects.
- Costs for the adoption of this policy should be factored into annual budgets and expenditure, and where budget is not available this should be requested from [line managers/team heads/directors] so that we can fulfil our [legal and regulatory obligations].

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- If dedicated training of resourcing is required to reasonably and practicably support effective adoption of this policy within projects.
- Costs for the adoption of this policy should be factored into annual budgets and expenditure, and where budget is not available this should be requested from [line managers/team heads/directors] so that we can fulfil our [legal and regulatory obligations].

## Training and awareness

[Organisation] [And its partners] will ensure that all relevant staff receive training in how to identify and respond appropriately to a vulnerable customer. We will do this through a combination of: [Include relevant methods e.g.]

- Training as part of our induction process
- Specific training for front line staff [refreshed ongoing/periodically].
- Flagging real examples in contact centre buzz sessions & other team meetings
- Communications and awareness materials (e.g. posters in areas for all members of staff to see)
- Highlighting, sharing and rewarding individual examples of staff providing great customer service to vulnerable customers

## Outsource Providers and third parties

[Organisation] will seek, both through its direct contractual relationships and through its contractors' sub-contractors to ensure that appropriate provisions are in place to protect vulnerable customers.

We will do these through ensuring that, where relevant, contractual providers are asked to demonstrate how they can support vulnerable customers, including through providing copies of any relevant vulnerable customers policy.

*[Alternate standard wording your organisation which might include]*

All reasonable endeavours will be made to ensure that suppliers abide by the standards set by [E.g. this policy/FCA guidance etc.]. Where third party suppliers cannot agree by these standards, [Organisation] will undertake a review of the third parties policies and operations to ensure that we are confident that the third party meets our standards in principle, even if they do not directly align but they will always have to meet our legal requirements. Where any of the above conditions are not met, this must be flagged within the [Organisation] risk register.

## Supporting policies/procedures

The following [Organisation] policies and procedures are relevant and either explicitly reference, implicitly provide for or have related procedures with provisions relating to vulnerable customers:

*[Include policies relevant to your organisation which might include any of the following]*

- Complaints procedure
- Data Protection Policy
- Privacy Policy *[this might need to state how you process data relating to vulnerable customers]*
- Customer security and verification procedures
- Safeguarding Policy
- Anti-bullying or harassment Policy
- Whistle-blowing policy
- Acceptable Use Policy
- Policies and procedures which promote safety and welfare - health and safety

## Oversight, Governance and monitoring

- Roles and responsibilities with reference to review and monitoring of this policy are defined below in the 'Roles & Responsibilities' section.
- Issues relating to this policy will in the first instance be raised at any of the following:  
*[insert relevant governance forums]*
- *[Insert any other relevant information about how you will monitor compliance with the policy for example staff quality checking, call listening, audits etc.]*
- *[You may wish to consider individual accountability – e.g. requiring staff to sign the policy as evidence they've seen/read it]*

## Roles & Responsibilities

The following roles within [Organisation] [and its service partners] have responsibilities in connection with this policy:

Partner	Functional Area	Role accountable	Responsibility
E.g. Organisation	E.g. Operations	E.g. Head of Operations	Overall accountability for ensuring partners adhere to policy
	E.g. Policy	E.g. Policy Manager	Overall responsibility for policy including review and monitoring of this policy and day to day advice for all partners on application of the policy.
		E.g. Training manager	Ensuring all training material adheres to policy and updating this as required.
		E.g. Recruitment Manager	Ensure that as part of staff and HR inductions, all staff members will confirm they have read and understood this policy and agree to abide by it.
		E.g. Departmental Managers	Carrying out checks to ensure relevant staff in their local team comply with the policy.
		E.g. Fundraising Manager	Disclosure checks for staff or volunteers working with children

- Staff with responsibilities under this policy should be able to evidence steps taken to ensure compliance.
- *[You may want to include specific advice on who is responsible for protecting vulnerable customers in particular scenarios unique to your organisation. For example if you carry out community events where children may be attending it may be necessary to stipulate safeguarding policies and procedures or what staff should do if they identify a risk in this situation.]*

## Questions

*[You may want to include specific advice on what staff reading the policy should do if they have an issue to report.]*

**For example]**

Is there a potential incident you have experienced or a question you have which isn't covered by this policy? Do you have needs which aren't covered by the resources identified in this policy (for example a gap in available training)?

If so, please contact [insert relevant manager] who will be happy to discuss this. They can be contacted through the below methods, and all questions or comments will be treated confidentially.

*[Flag how to contact, which subject line in an email, etc... to ensure these are treated confidentially].*

**[Optional:]**

Contact Details:

Tel:

Email:

Office location:

# Appendices

## Appendix 1

[Still to consider but might include: Vulnerability key stats, Vulnerable Customer Profiles, links to the accessibility page of the website].

### Standards

- Direct Marketing Association (DMA) - Code of Practice <https://dma.org.uk/the-dma-code>
- Direct Marketing Association (DMA) – Channel Guidelines LINK

### Guidance and Law

- DMA – ‘Caring for the vulnerable’ (training materials)  
[dma.org.uk/article/caring-for-the-vulnerable-training-materials](https://dma.org.uk/article/caring-for-the-vulnerable-training-materials)
- DMA - ‘guidelines for dealing with vulnerable consumers’ (White paper)  
[dma.org.uk/uploads/55c9b50f80d28-guidelines-for-dealing-with-vulnerable-consumers-august-2015\\_55c9b50f80c7b.pdf](https://dma.org.uk/uploads/55c9b50f80d28-guidelines-for-dealing-with-vulnerable-consumers-august-2015_55c9b50f80c7b.pdf)
- FCA Guidance – Consumer Vulnerability  
<https://www.fca.org.uk/publication/occasional-papers/occasional-paper-8.pdf>
- The Fundraising Regulator – Code of Fundraising Practice  
[www.fundraisingregulator.org.uk/code-of-fundraising-practice/](http://www.fundraisingregulator.org.uk/code-of-fundraising-practice/)
- Institute of Fundraising (IOF) – Treating Donors Fairly (TDF)  
[www.institute-of-fundraising.org.uk/library/treatingdonorsfairly/](http://www.institute-of-fundraising.org.uk/library/treatingdonorsfairly/)
- Mental Capacity Act (MCA) 2005: Code of Practice  
[www.gov.uk/government/publications/mental-capacity-code-of-practice](http://www.gov.uk/government/publications/mental-capacity-code-of-practice)
- Charities (Protection and Social Investment) Act 2016  
[www.gov.uk/government/news/charities-act-2016-new-fundraising-rules](http://www.gov.uk/government/news/charities-act-2016-new-fundraising-rules)
- Equality Act 2010: Defining Disability  
[www.gov.uk/definition-of-disability-under-equality-act-2010](http://www.gov.uk/definition-of-disability-under-equality-act-2010)
- Data Protection Act (DPA) 1998  
<https://www.gov.uk/data-protection/the-data-protection-act>

### Training

- DMA – Caring for the Vulnerable (FREE training materials)  
[dma.org.uk/article/caring-for-the-vulnerable-training-materials](https://dma.org.uk/article/caring-for-the-vulnerable-training-materials)
- Samaritans – Conversations with vulnerable people  
[www.samaritans.org/for-business/workplace-training/communication-training-courses/course-vulnerable-people](http://www.samaritans.org/for-business/workplace-training/communication-training-courses/course-vulnerable-people)
- DMA - Guidelines for call centres dealing with vulnerable people  
[dma.org.uk/uploads/55c9b50f80d28-guidelines-for-dealing-with-vulnerable-consumers-august-2015\\_55c9b50f80c7b.pdf](https://dma.org.uk/uploads/55c9b50f80d28-guidelines-for-dealing-with-vulnerable-consumers-august-2015_55c9b50f80c7b.pdf)



## Additional Information

- (Organisation) policy is the primary piece of information you should follow. There are however links below with useful information should you wish to find out more:
- ChildLine – Get support  
[www.childline.org.uk/get-support/](http://www.childline.org.uk/get-support/)
- Scope – About disability  
[www.scope.org.uk/support](http://www.scope.org.uk/support)
- Alzheimer’s Society  
[www.alzheimers.org.uk/info/20012/helpline](http://www.alzheimers.org.uk/info/20012/helpline)
- Mencap  
[www.mencap.org.uk](http://www.mencap.org.uk)
- Mind  
[www.mind.org.uk/information-support/guides-to-support-and-services/](http://www.mind.org.uk/information-support/guides-to-support-and-services/)
- Dementia Friends  
<https://www.dementiafriends.org.uk>
- RNIB  
[www.rnib.org.uk/practical-help](http://www.rnib.org.uk/practical-help)

## Procedures/process List

Complaints

### Supporting policies

Safeguarding policy

Data Protection Policy

Employee Contracts/Handbook

Volunteer handbook

### Regulators

Add as required

## Appendix 2

### MENTAL CAPACITY: OUR OBLIGATIONS

Under the **Mental Capacity Act 2005(MCA)**, a number of statutory principles were established, including:

- A person must be assumed to have capacity unless it is established that they lack capacity;
- A person is not to be treated as unable to make a decision unless all [practicable] steps to help him or her to do so have been taken without success; and
- A person is not to be treated as unable to make a decision merely because he or she makes an unwise decision.

## Determining Mental Capacity

Under the MCA 2005, a person lacks capacity in relation to a particular matter if at the [material] time he or she is unable to make a decision for himself or herself in relation to the matter because of an impairment of, or a disturbance in the functioning of, the mind or brain.

### How can I know whether someone has 'mental capacity'?

There is a two tier test for assessing this.

Part 1:

- (a) Does the person have an impairment of, or a disturbance in the functioning of, the mind or brain? – Have they told you this?
- (b) Does the impairment or disturbance mean that the person is unable to make the specific decision at the time that it needs to be made?

Part 2:

Can the person:

- (a) Understand the information relevant to the decision,
- (b) Retain that information,
- (c) Use or weigh up that information as part of the process of making the decision, or
- (d) Communicate his or her decision (whether by talking, using sign language or any other means)

If someone cannot undertake any one of these four aspects of the decision-making process, then he or she is unable to make an [informed decision].

[IOF TDF appendix 1]

### CHECKLIST:

Signs that an individual may be in a 'Vulnerable Circumstance'

Is the individual:

- Asking irrelevant and unrelated questions, or displaying signs of forgetfulness?
- Unable to read and understand the information they are provided with, and asking for it to be continually repeated?
- Responding in an irrational way to simple questions?
- Saying 'yes' or 'no' at times that it is clear they haven't understood?
- Taking a long time or displaying difficulty in responding to simple questions or requests for information?
- Repeating simple questions such as 'who are you', 'what charity is it' and 'what do you want'?
- Wandering off the subject at hand and making incongruous statements?
- Saying that they are not well or not in the mood to continue?
- Displaying signs of ill-health like breathlessness or making signs of exasperation or discontent?
- Giving a statement such as 'I don't usually do things like this, my husband/wife/son/daughter takes care of it for me?'
- Indicating in any way that they are feeling rushed, flustered, or experiencing a stressful situation?
- Having trouble remembering relevant information, for example that they are already a regular donor to that charity or have recently donated?
- Donating an unexpectedly large gift with no prior relationship? (There being no prior relationship before a gift is made does not on its own constitute 'vulnerability': many legacy and major donor gifts to charities are given without the existence of a relationship between the donor or charity).

[IOF TDF]

## Appendix 3

### Sources/ Our Population and Vulnerabilities

- UK population(2015) is estimated to be 65.1 million  
<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/articles/overviewoftheukpopulation/mar2017>
- 850,000 people are (estimated to be) living with dementia in the UK  
<https://www.dementiastatistics.org/statistics-about-dementia/>
- One in six adults is living with a mental health problem (ONS, 2001)  
<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/mentalhealth>
- Major depression affects around 1 in 10 of the general population at any time  
<https://www.mind.org.uk/media/273476/proceed.pdf?ctald=/about-us/our-policy-work/reports-and-guides/slices/gp-practices/>
- 6,188 suicides registered in the UK in 2015. This is over 16 a day.  
<https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/bulletins/suicidesintheunitedkingdom/2015registrations>
- one in six of the population has some form of hearing loss  
<https://www.actiononhearingloss.org.uk/your-hearing/about-deafness-and-hearing-loss/statistics.aspx#>
- Over two million people in the UK are living with sight loss (2015)  
<http://www.rnib.org.uk/knowledge-and-research-hub/key-information-and-statistics>
- Around 100 people each week are diagnosed with MS  
[https://www.mssociety.org.uk/sites/default/files/MS%20in%20the%20UK%20January%202016\\_0.pdf](https://www.mssociety.org.uk/sites/default/files/MS%20in%20the%20UK%20January%202016_0.pdf)
- There are an estimated 10 million people in the UK suffering from arthritis
- It's estimated that up to 1 in every 20 people in the UK has some degree of dyslexia  
<http://www.nhs.uk/conditions/Dyslexia/Pages/Introduction.aspx>
- 32% of all people aged 65+ in the UK live alone (3.64 million people).
- Every day 150 families in Britain become homeless  
[http://england.shelter.org.uk/?\\_ga=2.179375332.1547397338.1498837379-1951183032.1494515106](http://england.shelter.org.uk/?_ga=2.179375332.1547397338.1498837379-1951183032.1494515106)
- Almost 822 cancers were registered per day (2015)  
<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/conditionsanddiseases/bulletins/cancerregistrationstatisticsengland/2015>