

# CURZON ROSE LIMITED t/a PENSION JUSTICE

## Vulnerable People Policy

July 2017

At Curzon Rose Limited t/a Pension Justice (hereinafter referred to as Pension Justice) we take our responsibility towards vulnerable consumers very seriously. This means we operate within legal guidelines that aim to protect vulnerable people and we follow best practice to ensure we deal with them in a fair, non-discriminatory, ethical way.

This policy outlines how we identify vulnerable people and the procedures we have put in place for dealing with them.

### Identifying vulnerable people

The Mental Capacity Act 2005 says that a person is unable to make a specific decision if they cannot understand information about the decision to be made; cannot retain that information in their mind; cannot use or weigh up that information as part of the decision-making process or cannot communicate their decision.

Pension Justice will consider a potential client vulnerable if one or more of the personal situations or personal characteristics listed below are identified during an initial call or home visit:

Characteristics		
Old age	Low income	Inexperience
Low literacy	Learning disabilities	Cultural barriers
Physical disabilities	Mental health issues	English as a second language
Health problems	Location	Being a carer
Lack of internet access	Lone parent	Living alone or in poor living conditions

Situation	
Threat of harm	Victim of crime or accident
Bereavement	Loss of income
Relationship breakdown	Loss of employment
Having recently left care	Threat of deportation
Concern over access to children	Concern over child welfare

## Training

All employees, representatives and Agents of Pension Justice receive regular training and updates on how to identify and deal with vulnerable people. Training is based on standards of best practice and how to apply them. This includes practical tips on how we talk with vulnerable people on the phone and face-to-face, how we check they have understood conversations and contractual terms; and what we do if they are confused or show distress.

The specific procedures we have in place for identifying and dealing with vulnerable people are regularly reviewed by senior management and are detailed in internal documents available for reference by all Pension Justice employees, representatives and Agents of Pension Justice. Below is an overview:

1. As soon as a potential client is identified as vulnerable, they are logged onto our case management system with details of their vulnerability and how they wish to be contacted. If their communication needs are due to a medical disability, e.g. they can only be contacted by telephone since they are blind, we give them the opportunity to make a Personal Declaration about their capabilities and communication needs and record it in our case management system, taking extra care to process the information as Sensitive Personal Data in accordance with the DPA 1998
2. A senior member of Pension Justice who is experienced in dealing with vulnerable people is notified and will seek to establish if we can deal with the vulnerable potential client directly; in which case we assign the vulnerable potential client a specific, single point of contact within our company; or if we need to seek authority from a carer/third party to deal with the case
3. We take extra care to ensure that a vulnerable potential client fully understands our Terms of Business and to protect their financial interests. We also ensure that they understand what will happen and what to expect throughout the claims process
4. If the vulnerable potential client authorises a third party to deal with us on their behalf, we introduce extra security checks to verify the third party's identity and to identify any possibility of fraud and financial abuse
5. Once we feel happy to proceed with a vulnerable potential client's case, we make every effort to ensure we conduct business in a sympathetic, ethical and practical manner

For further information, please see:

- Equality Act 2010
- Mental Capacity Act 2005
- Distance Selling and E-Commerce Regulations (DSRs and ECRs)
- DPA 1998
- MOJ Enforcement Standards 2014
- SRA Handbook – Providing Services to People who are Vulnerable 2016
- DMA White Paper 2015 - Guidelines for Call Centres dealing with Vulnerable Consumers