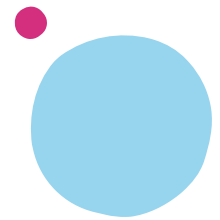




Vulnerable Customers Policy

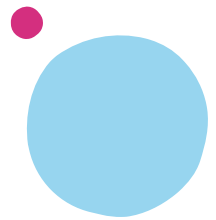
Approval Date: August 24

Version number: 13



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Policy Details	
Policy name:	Vulnerable Customers Policy
Date approved:	April 2024
Version number:	v12
Level 1 Risk Category:	Conduct Risk
Level 2 Risk Category:	Vulnerable Customers Risk
Aligns to Group Policy and Type:	N/A

What is the policy objective?

The purpose of the vulnerable customer policy is to communicate the minimum requirements for our colleagues, business areas and relevant third parties to identify and treat our vulnerable customers appropriately. In short vulnerability is what we identify, tailored support is what we offer.

Alignment to the Vulnerable Customer Policy supports compliance with the FCA Guidance on the treatment of Vulnerable Consumers FG21/1, The Equality Act 2010 and Consumer Duty CP21/13.

In addition to the requirements set out within this Policy additional requirements for the treatment of customers experiencing financial vulnerability are set out within the Customers in Financial Difficulty Policy.

The requirements specified in this policy have been devised to help us manage risk and mitigate potential harm to vulnerable customers². This is in line with our regulatory obligation to treat customers fairly and act to deliver good outcomes³ for retail customers and our legal obligation to make reasonable adjustments. Customers in vulnerable circumstances may have additional needs or be at a greater risk of harm if things go wrong. Customers with characteristics of vulnerability should experience outcomes as good as those for other customers.

TSB definition of vulnerability:

In TSB we recognise that people through their life, or just for a short time may need us to work with them differently. This could be because of their physical or mental wellbeing, difficulty understanding and managing money or because of a life event. As a business we are committed to working hard to identify such situations and in turn tailor the support we can offer customers¹ with their banking needs.

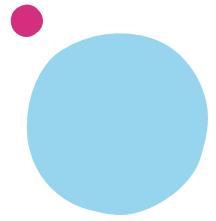
This definition is in line with the FCA's own, as published in their document 'Approach to Consumers', "Someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when a firm is not acting with appropriate levels of care".

A summary of the main regulatory requirements and guidance that support the need for this policy are included in the appendix of this document. In addition to this, lower-level guidance information to help meet the policy requirements can be accessed via the vulnerable customer site.

¹ Customers are considered to be 'natural persons', which includes individuals and business customers, where businesses are not incorporated. This includes sole traders and some partnerships and reflects that characteristics of vulnerability may equally impact an individual in relation to their personal and business account.

² TSB definition of Customer Harm: 'Actual Customer Harm will have occurred if a customer has suffered material distress; inconvenience; financial loss or detriment resulting from failures in our product design/pricing, communications, support, business model or controls; or where we've failed to mitigate foreseeable harm. Potential harm is recognised where, without intervention, customers are at significant risk of experiencing material distress; inconvenience; financial loss or detriment in future'

³TSB definition of a good outcome:



What is an outcome? An outcome is how things turn out for a customer when we promote, sell, serve or communicate with them.

A customer will have received a good outcome if we can demonstrate they've received:

- the information they need at the right time and in a way that supports good understanding and decision making.
- a product or service that matches their needs, works as intended and provides fair value.
- helpful, responsive, and accessible customer service

Who does this policy apply to?

- This policy applies to all colleagues in TSB
- Third parties and outsourcers, Joint Ventures and Partnerships. We make sure that the third parties we use also act to deliver good outcomes for customers and are aware of our Vulnerable Customer policy.

Waivers

Waivers to this Policy will be considered. For the definitions and forms to raise requests and guidance refer to the [Policy Portal](#).

Breaches

Any Breaches identified should be notified to Enterprise Assurance & other appropriate areas using the process detailed in the Incident Guidance. Refer to the [Policy Framework](#) for further details.

What must we do?

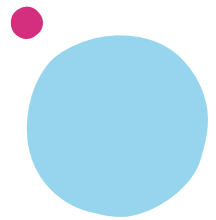
How do we check we are doing that? (i.e. Monitoring of the control activity)

1. Understand vulnerable customer needs and enable them to pursue their financial objectives.

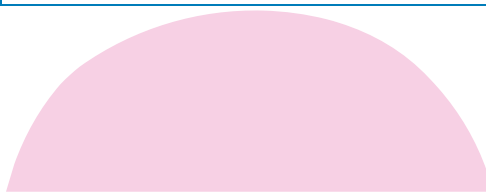
To ensure we provide our customers with a positive experience they should not have to tell us of their needs more than once – that is unless their circumstances change.

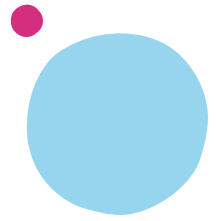
- Customer facing colleagues must identify, understand, record and handle vulnerable customers' requirements, and act to deliver good outcomes.
- This should include as a minimum reviewing existing tailored support flags or, if vulnerability is identified, the addition of a new tailored support.
- Flags should be loaded for an appropriate time in agreement with the customer.
- The addition of unnecessary duplicate flags should be avoided.

- Procedures published on the intranet
- Documented processes
- Customer journeys
- Customer facing colleagues record tailored support flags via Proteo in line with procedures through the use of the Tailored Support Powerapp for capturing Tailored Support notes.
- The Vulnerable Customer team quarterly sampling of Tailored Support flags focusing on colleague use of the Power App to validate Tailored Support notes meet requirements, including appropriate category of support selected, support needs are captured, the flag is loaded for an appropriate period and consent is captured.
- The Vulnerable Customer team provides monthly data on use of the Tailored Support Decision Framework (TSDF) at Business Unit level via the vulnerable customer dashboard.
- Business unit completion of appropriate and proportionate vulnerable customer quality checking, which should include clear actions to improve outcomes for vulnerable customers where gaps are identified. What is considered a proportionate sample should be agreed with the Vulnerable Customer Team but should be no less than 10% of overall Quality Control sample.

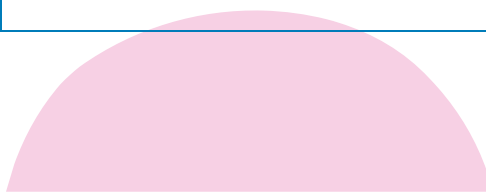


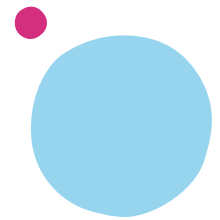
<ul style="list-style-type: none"> • Customer consent to record should be obtained in line with procedures and confirmed within the Tailored Support flag. Information recorded within the flag should be relevant, necessary and in line with GDPR sensitive data requirements. • Colleagues must know what to do in the event explicit consent cannot be captured. • Colleagues and Business Units must be flexible in their approach to meet the needs of our vulnerable customers through use of the Tailored Support Decision Framework. • Business Units must have systems in place to ensure and evidence they are providing good outcomes for vulnerable customers within the quality of Tailored Support flags and vulnerable customer interactions. • Completion of complaints root cause analysis to understand where potential for vulnerable customer harm is occurring. 	<ul style="list-style-type: none"> • Completion of outcome testing/thematic reviews by Enterprise Assurance, for the period a customer has a product with us, to highlight and manage any issues with the way they have been treated. <p>Outcome testing should demonstrate a comparison for vulnerable and other customers to help identify where poor outcomes and vulnerable customer harm may be present.</p> <p>Testing should include a proportionate sample of Vulnerable customers which should be no less than 10% of overall testing, including servicing outcomes.</p> <ul style="list-style-type: none"> • When Vulnerable Customer Team Tailored Support flag testing identifies potential poor outcomes details are shared with Business Units for additional quality control. Colleague coaching and development is to be provided and evidenced where applicable. • Journey owners' completion of complaints root cause analysis to understand where potential for vulnerable customer harm is occurring. Journey owners are responsible for implementing action plans to improve outcomes for vulnerable customers where gaps are identified. Action plans should be documented within complaints committee governance papers. The customer outcomes team should be represented at Complaints Committee for oversight purposes. • VC Policy controls.
<p>2. Skills and capability of staff</p> <p>All colleagues should understand how their role impacts the fair treatment of vulnerable customers.</p> <ul style="list-style-type: none"> • Colleagues are required to complete the annual mandatory Vulnerable Customer training which is held within the Being Inclusive Core Learning module. • Business Units are responsible for ensuring 95% completion rates are achieved for Core learning and escalating non-compliance to the Policy Owner. • In addition to core learning all customer facing colleagues should complete additional quarterly 	<ul style="list-style-type: none"> • New to bank colleagues' completion of available vulnerable customer training within Induction • Annual review of Core Learning content by Policy Owner. • Annual review of additional vulnerable customer training modules • Annual completion of Vulnerable customer Core learning • Policy control monitoring completion of vulnerable customer training. • Review of all vulnerable customer training and colleague support information available via the Tailored Support Site if there are new Legal or Regulatory requirements which would impact our approach to vulnerable customers. • Completion of ad-hoc vulnerability modules by customer facing teams. Completion should be tracked by BU with a minimum 95% completion requirement. Failure to meet training requirements should be escalated via relevant Risk Committee and a plan to address gaps agreed with the Vulnerable Customer team.



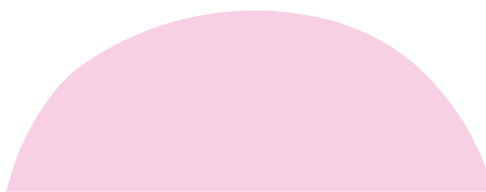


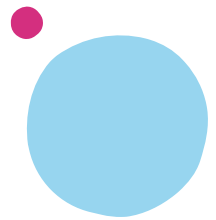
<p>vulnerable customer training modules. Completion rates should be monitored at BU level. Training will be delivered via the Source to colleagues who are required to complete the training.</p> <ul style="list-style-type: none"> • Colleagues must demonstrate an awareness of the tailored support toolkit, the vulnerable customer site and procedures hub. The site content contains details of internal and external support options available to customers. • Business Units are to evidence colleague competency. This should include identifying colleagues who require additional coaching and development to support them with the identification and recording of customer vulnerability. 	<ul style="list-style-type: none"> • BUs to identify gaps in colleagues' knowledge and evidence the actions taken to improve & remediate. Outputs and actions should be monitored and reported at the appropriate risk forum. • Business Unit quality control. Where poor outcomes for customers are identified through VC team TS Flag quality control of Tailored support flags. Business Units should carry out call monitoring and provide the relevant coaching and development to colleagues by utilising the tools available within the embedding confidence section of the Tailored Support site.
<p>3. Product and service design</p> <p>Business Units must be aware they have a responsibility to identify and capture vulnerability, within end-to-end journeys and product applications. They must design these in a way which acts in good faith, avoids causing foreseeable harm and enables and supports vulnerable customers to pursue their financial objectives.</p> <ul style="list-style-type: none"> • Completion of a Customer Impact Assessment is mandatory for any new or amended products, journeys or propositions which have a customer impact. • Understand vulnerable customer needs, drivers, and characteristics. • Business Units are responsible to build the requirements of vulnerable customers into their business unit processes and procedures. • Ensure vulnerable customers can access & understand our products, services, and premises through each of our applicable channels. • When a product or service is outsourced to a supplier, they should act to deliver good outcomes. • Business Units must act to avoid causing foreseeable vulnerable customer harm by evaluating vulnerable customer needs at all stages of the 	<ul style="list-style-type: none"> • Evidence provided through mandatory completion of a customer impact assessment, business area governance committee/forum, approved papers, minutes and actions logs. Customer Impact Assessments (CIA) are reviewed by the Customer Outcomes Team to ensure compliance with Consumer Duty and Vulnerable Customer requirements. Business Units are required to action any recommendations and to retain sign off and approval of the CIA report for governance purposes. • Approved supplier onboarding due diligence. • Oversight of third-party supplies and outsourcers for alignment to FG21/1 'Guidance on the fair treatment of vulnerable consumers' and A Consumer Duty FG22/5 requirement • The inclusion of vulnerable customer representation in research groups.





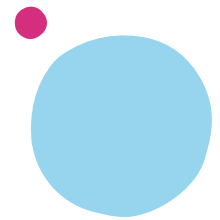
<p>customer journey, through each of our channels, when designing, developing or making changes to: Products, Propositions, Supporting Systems/Applications, Communications, Processes and Services.</p> <ul style="list-style-type: none"> • Business Units must act in good faith and not take advantage of vulnerable customer’s behavioural bias, whilst also acting to remove unreasonable barriers. • Business Units must comply with Equality Act 2010 requirements to create reasonable adjustments and anticipate the needs of customers with protected characteristics. 	
<p>4. Communications</p> <p>All communications should be understandable and accessible to the target market and where possible vulnerable customers should be able to communicate with us through their preferred method.</p> <ul style="list-style-type: none"> • Communications to vulnerable customers must comply with requirements set out within the Customer Communication and Product Promotions Policy and associated technical standards • We should consider how we communicate with vulnerable customers taking their needs into account. • Multiple channels should be offered where possible so vulnerable customers have a choice, and we should be able to provide accessible communications when requested. 	<ul style="list-style-type: none"> • Use of the Workfront approval system allowing key stakeholders opportunity to review, approve and identify improvements to customer collateral where required. • Communications assessed against Brand & Marketing comprehension standards and customer communications checklist is completed when applicable. • Use of Customer Impact Assessment to identify gaps in channel availability, and customer information is understandable and accessible • An annual review of Brand guidelines by the VC Team to ensure accessibility is considered and captured. • A VC Policy control aligning to accessible communication requirements. • Use of OCE alerts to review change across the business to ensure Business Units are making communications accessible and understandable
<p>5. Monitoring and Evaluation</p> <p>Business Units should utilise a suite of Management Information (MI) to ensure that vulnerable customers are being identified and are receiving outcomes equivalent to other customers.</p>	<ul style="list-style-type: none"> • EA outcome testing/thematic/end-to end reviews, for the period a customer has a product with us to identify if vulnerable customers are receiving good outcomes in line with other customers. Action to be taken by journey owners where poor outcomes are identified. • Policy owner oversight of localised business area control activity (as part of the policy annual review)





<ul style="list-style-type: none"> • Business Units (BU) are required to obtain or produce management information to enable them to mitigate actual or potential foreseeable vulnerable customer harm and drive good outcomes. Including vulnerable customer outcome indicators. • Business Unit Management Information should be of sufficient quality to be able to identify which products and processes may be causing vulnerable customer detriment and/or harm and require change to improve vulnerable customer outcomes. • Business Units are required to interrogate vulnerable customer MI relevant to their area of responsibility to ensure vulnerable customers are receiving good outcomes which are equivalent to other customers. This should be done as a minimum quarterly within an appropriate governance forum. MI used could include outcome testing, complaints data, training completion, use of TSDF and QC outputs. What is considered relevant to each BU should be agreed with the Policy Owner. • Business Units must have controls and procedures in place that will ensure both potential and actual vulnerability is being identified, recorded, correctly handled, monitored. With a particular focus on areas where customers are more susceptible to vulnerability including, but not exhaustively; - <ul style="list-style-type: none"> • Responsible lending • Customers in financial difficulty • Fraud and financial crime • Local events/incidents (pandemics, cost of living impacts significant incidents such as terrorist attacks) • Customer life events (e.g., bereavement, divorce, victim of fraud) 	<ul style="list-style-type: none"> • Complaints root cause analysis to understand potential for vulnerable customer harm and where poor outcomes are occurring. • Vulnerable customer policy controls aligning to use of available VC Management Information. • The Vulnerable customer Team produces a monthly VC dashboard which is distributed to key stakeholders. • Inclusion of vulnerable customer metrics within the Consumer Duty dashboard to demonstrate outcomes for Vulnerable customers compared to other customers. • Business unit quality control as outlined in Section 1 of the Policy • Business Unit attendance at monthly Vulnerable Customer forum to stay abreast of the internal and external vulnerable customer landscape, ensuring a suitable deputy attend's where BU representative cannot.
<p>6. Events Management</p>	<ul style="list-style-type: none"> • Events root cause analysis to understand where potential for vulnerable customer harm is occurring





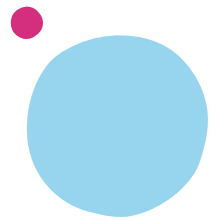
<p>Colleagues and Business Units are responsible for assessing potential for vulnerable customer harm when events have occurred. When logging Events Business Units must be able to demonstrate vulnerable customer consideration</p>	<ul style="list-style-type: none"> • Timely recording of Events by Business Units
	<ul style="list-style-type: none"> • Monthly review of Events log by Vulnerable Customer Team
	<ul style="list-style-type: none"> • Use of the vulnerable customer assessment within the Event recording tool.
	<ul style="list-style-type: none"> • Monitor and sample event notifications to ensure vulnerability is being adequately considered and assessed.
<p>7. Vulnerable Customer Policy</p> <ul style="list-style-type: none"> • Policy owner must ensure controls are working as intended and the VC policy is fit for purpose. • Keep abreast of regulatory change/changes on the horizon to assess the impacts arising from this change. • Ensure changes are implemented on time. 	<ul style="list-style-type: none"> • Annual completion of a Policy and control effectiveness review
	<ul style="list-style-type: none"> • Monthly reporting of Policy and control effectiveness at appropriate Risk Governance Forum
	<ul style="list-style-type: none"> • Ongoing engagement with regulatory change
	<ul style="list-style-type: none"> • Attendance and participation in relevant industry and regulatory events

Where to find out how to meet the requirements?

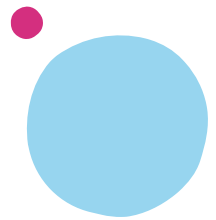
1. [Vulnerable Customers intranet site pages](#). Insight about vulnerable customer needs and the support we can offer.
2. For specific business processes partners should refer to the [Procedures Hub](#)
3. Customer Impact [Tool](#) a tool to help you assess and understand customer needs to support the development of products, propositions, processes, customer journeys, services etc...

Appendix – What are the main regulatory requirements and guidance that support the need for this policy?

Source	Summary of requirements / guidance
1. FCA's Principles 6, 7	<p>The regulatory requirement to treat customers fairly, pay due regard to their information needs and communicate in a way that is clear, fair, and not misleading which includes reference to the 6 consumer outcomes:</p> <ul style="list-style-type: none"> • Outcome 1: Consumers can be confident they are dealing with firms where the fair treatment of customers is central to the corporate culture.



	<ul style="list-style-type: none"> • Outcome 2: Products and services marketed and sold in the retail market are designed to meet the needs of identified consumer groups and are targeted accordingly. • Outcome 3: Consumers are provided with clear information and are kept appropriately informed before, during and after the point of sale. • Outcome 4: Where consumers receive advice, the advice is suitable and takes account of their circumstances. • Outcome 5: Consumers are provided with products that perform as firms have led them to expect, and the associated service is of an acceptable standard and as they have been led to expect. • Outcome 6: Consumers do not face unreasonable post-sale barriers imposed by firms to change product, switch provider, submit a claim or make a complaint 																																		
<p>2. FCA Consumer Credit sourcebook (CONC) (covering lending products)</p>	<p>The requirement for customer vulnerability (including mental capacity limitations) to be considered in policies and procedures across the organisation.</p>																																		
<p>3. FG21/1: Guidance for firms on the fair treatment of vulnerable customers</p>	<p>The FCA published their final paper in February 2021 (which follows on from the GC 20-03 guidance paper published in July 2020) which covers 6 key focus areas and 15 guidance points around what firms should do (listed below):</p> <table border="1" data-bbox="453 927 1445 2051"> <tr> <td rowspan="2">1</td> <td rowspan="2">Understanding customers' needs</td> <td>a</td> <td>Understand the nature and scale of characteristics of vulnerability that exists in their target market and customer base</td> </tr> <tr> <td>b</td> <td>Understand the impact of vulnerability on the needs of vulnerable customers, by asking themselves 'what type of harm or disadvantage' their customers may be vulnerable to, and how this might affect the experience or outcome for that customer</td> </tr> <tr> <td rowspan="3">2</td> <td rowspan="3">Skills and capability</td> <td>a</td> <td>Embed the fair treatment of vulnerable customers. All colleagues should understand how their role impacts the fair treatment of vulnerable customers</td> </tr> <tr> <td>b</td> <td>Ensure frontline colleagues have the skills and capability to recognise and respond to a range of vulnerable characteristics.</td> </tr> <tr> <td>c</td> <td>Offer practical and emotional support for frontline colleagues.</td> </tr> <tr> <td rowspan="2">3</td> <td rowspan="2">Product and service design</td> <td>a</td> <td>Consider positive and negative impacts of a product or service on vulnerable customers. Design products to avoid potential harmful impacts</td> </tr> <tr> <td>b</td> <td>Take vulnerable customers into account at all stages of the product and service design process. Including idea, generation, development, testing, launch and review to ensure products and services meet their needs.</td> </tr> <tr> <td rowspan="4">4</td> <td rowspan="4">Customer service</td> <td>a</td> <td>Systems and processes that support and enable vulnerable customers to disclose their needs.</td> </tr> <tr> <td>b</td> <td>Flexible customer service to meet the needs of vulnerable customers</td> </tr> <tr> <td>c</td> <td>Make sure customers are aware of the support that is available to them. Including third party or special support services.</td> </tr> <tr> <td>d</td> <td>Systems and processes that support delivery of good customer service. Including notes that give information about the customer's needs.</td> </tr> <tr> <td>5</td> <td>Communications</td> <td>a</td> <td>All communications about products and services should be understandable for the target market.</td> </tr> </table>	1	Understanding customers' needs	a	Understand the nature and scale of characteristics of vulnerability that exists in their target market and customer base	b	Understand the impact of vulnerability on the needs of vulnerable customers, by asking themselves 'what type of harm or disadvantage' their customers may be vulnerable to, and how this might affect the experience or outcome for that customer	2	Skills and capability	a	Embed the fair treatment of vulnerable customers. All colleagues should understand how their role impacts the fair treatment of vulnerable customers	b	Ensure frontline colleagues have the skills and capability to recognise and respond to a range of vulnerable characteristics.	c	Offer practical and emotional support for frontline colleagues.	3	Product and service design	a	Consider positive and negative impacts of a product or service on vulnerable customers. Design products to avoid potential harmful impacts	b	Take vulnerable customers into account at all stages of the product and service design process. Including idea, generation, development, testing, launch and review to ensure products and services meet their needs.	4	Customer service	a	Systems and processes that support and enable vulnerable customers to disclose their needs.	b	Flexible customer service to meet the needs of vulnerable customers	c	Make sure customers are aware of the support that is available to them. Including third party or special support services.	d	Systems and processes that support delivery of good customer service. Including notes that give information about the customer's needs.	5	Communications	a	All communications about products and services should be understandable for the target market.
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6	Monitoring and evaluation	b	Consider how you communicate with vulnerable customers, taking their needs into account. Multiple channels should be offered where possible, so vulnerable customers have a choice.
		a	Processes that can evaluate where needs of vulnerable customers have not been met so firms can make improvements.
		b	Produce and review MI to show outcomes they are delivering for vulnerable customers.

The paper also provides examples of vulnerable customer harm throughout and 4 key drivers which increase the risk of vulnerability. For reference we have mapped these drivers to the previously published FCA categories and TSB's tailored support categories of vulnerability below:

4 FCA Drivers of vulnerability	5 FCA Categories	7 TSB Tailored Support Categories	Examples of vulnerability
Health	1. Physical disability/ Health	Ease of access	Accessibility/ disability needs
		Physical Wellbeing	Long term illness needs
	2. Mental health conditions & mental capacity	Support interactions & communication	Memory, decision making, communication
Life Event	3. Life event	Mental Wellbeing	Addiction, depression, anxiety etc
		Life event	Economic and domestic abuse, divorce/ separation, bereavement, fraud etc...
Resilience	4. Financial resilience	Managing finances	Ability to withstand financial shock
Capability	5. Financial capability	Understanding finances	Poor numeric/language skills

4. [FG22/5 Guidance for firms on the Consumer Duty](#)

The Duty is intended to improve outcomes for all customers, and we would expect firm monitoring to identify where distinct groups of customers, such as customers with characteristics of vulnerability or customers who share protected characteristics (as defined by the Equality Act 2010 or equivalent legislation), get worse outcomes than other customers.

Where firms identify an area where they are not delivering good outcomes for their customers or a distinct group of customers, we would expect the firms to have processes in place to investigate the cause(s) and address any problems. It should be noted, however, that the Duty does not alter or replace firms' existing obligations under the Equality Act 2010 to avoid direct and indirect discrimination.