

VULNERABLE CUSTOMER POLICY

How we support customers whose circumstances make things harder

Our promise in brief

- Anyone can go through a difficult time. Nearly half of UK adults show at least one sign of vulnerability, so we never treat it as unusual or as a label.
- You don't have to tell us anything you don't want to. If you do, we'll use it only to help you, and you'll only need to tell us once.
- We'll change how we work to suit you: more time, a different format, someone with you, or a different way to get in touch.
- You'll get the same quality of advice and the same good outcomes as any other customer.

To ask for extra support, call us on **01329 556553** or email us. You can speak to your adviser or anyone you deal with here.

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1. What we mean by vulnerability

The Financial Conduct Authority (FCA) describes a vulnerable customer as someone who, because of their personal circumstances, is especially likely to be harmed when a firm doesn't act with the right level of care.

Vulnerability isn't a fixed category. It can be short-term or long-term, it can come and go, and it isn't always visible. It's about the risk of harm, so we focus on what you need rather than putting you in a box. The FCA groups the causes into four areas. These are examples only:

Health	Life events	Resilience	Capability
Physical disability; serious or long-term illness; hearing or sight loss; mental health conditions; reduced mental capacity or memory loss	Bereavement; separation or divorce; job loss or income shock; caring for someone; new to the UK; leaving the armed forces or returning from abroad; domestic or economic abuse	Low or irregular income; too much debt; little or no savings; few people to turn to; low emotional resilience	Low confidence with money; difficulty reading or with numbers; English not your first language; limited digital skills; learning difficulties; first time dealing with a mortgage

Having one of these doesn't automatically mean you'll need extra help, and you can need help without any of them. We'll talk to you about what would actually make a difference.

2. Telling us about your circumstances

Many people never mention what's going on, and that's completely fine. We'll look out for signs that something might be making things harder, such as during our fact-find, and we may gently ask whether anything would help. You can always say no.

If you do tell us, you can do it in whatever way feels easiest: in person, by phone, by email, or through someone you trust. We'll record what you've told us so you don't have to repeat it to anyone else you deal with at Lawson Financial.

Your circumstances can change at any point. Let us know if they do, and we'll update how we support you.

3. How we can adapt

Here are some of the things we can do. If there's something else that would help, just ask.

- **Time:** longer or shorter meetings, breaks, more time to think things over before you decide, and no pressure to make a decision on the spot.
- **Format:** large print, audio, plain-English summaries, or documents sent ahead so you can read them in your own time.
- **Contact:** phone, email, video or face to face; a contact time and method that's safe and convenient for you; Relay UK if you're deaf or have a speech impairment (dial 18001 then our number).
- **Support:** you're welcome to bring someone you trust to any meeting or call.
- **Checking understanding:** we'll explain the key features, risks and costs, including our fee and when it's payable, and check they make sense to you before you commit.
- **Follow-up:** a written summary after important conversations, so you have something to refer back to.

4. When we take extra care

Some mortgage situations carry more risk, so we look at them more closely for every customer. They include:

- consolidating unsecured debts into a mortgage
- Right to Buy purchases
- a mortgage term that runs past your planned retirement, or lending in later life
- interest-only or part-and-part mortgages
- borrowing after a recent life event, such as a separation, bereavement or income drop
- bridging and other short-term finance

In these cases we'll explain the alternatives and the long-term costs, and we'll record clearly why our recommendation suits you. Where you may need extra support, we'll give you more time to consider the recommendation and check you're comfortable with it before anything goes ahead.

5. Having someone help you

Someone you trust

You can ask us to speak to a family member, friend or adviser on your behalf. We'll need your permission first, and we'll confirm with you what they can and can't do.

Power of attorney and deputies

We always start from the position that you can make your own decisions, and we'll support you to do so. If someone can't make a particular decision, even with support, we'll deal with a properly appointed attorney (under a registered Lasting Power of Attorney) or a court-appointed deputy. We'll check their authority and keep a copy on file. Any advice will still be based on your needs, circumstances and best interests, and we'll involve you as much as possible.

If something doesn't feel right

If we're worried that someone may be pressuring you or taking advantage of you, we'll take it seriously. We may ask to speak to you on your own, and we won't go ahead until we're comfortable that the decision is genuinely yours.

6. Your information

Details about your health or personal circumstances are sensitive, and the law gives them extra protection. We'll only record what we need to support you, we'll explain why, and we'll ask for your consent where it's needed.

With your agreement, we may share relevant details with lenders, insurers or our partner The Insurance Surgery, so they can support you too and you don't have to explain things again. You can ask us what we hold and change your mind at any time. Our **Privacy & AI Policy** explains how we look after your information in full.

7. If things get difficult

If you're worried about keeping up your mortgage payments, contact your lender as early as you can. Lenders must offer support tailored to your situation, and we can help you prepare for that conversation. These free, confidential services can also help:

Who	How they help	Contact
MoneyHelper	Free, impartial money and pensions guidance, backed by government	0800 138 7777 · moneyhelper.org.uk
StepChange	Free debt advice	0800 138 1111 · stepchange.org
National Debtline	Free debt advice	0808 808 4000 · nationaldebtline.org
Citizens Advice	Help with money, housing, work and legal problems	citizensadvice.org.uk
Cruse Bereavement Support	Support after someone dies	0808 808 1677 · cruse.org.uk
National Domestic Abuse Helpline	Free, confidential support, 24 hours a day	0808 2000 247 · nationaldahelpline.org.uk
Samaritans	Someone to talk to, any time, day or night	116 123 · samaritans.org

If you're affected by domestic or economic abuse, tell us the safest way and time to contact you and we'll stick to it.

8. How we make sure this works

- **Who's responsible:** a named senior person at Lawson Financial is responsible for this policy and for making sure it's followed. Everyone who deals with customers knows the policy and how to pass on anything you tell them.
- **Keeping up to date:** everyone who deals with customers keeps up with FCA guidance and good practice on supporting vulnerable customers, and we update how we work when it changes.
- **Records:** we keep a confidential register of customers who've asked for or need extra support, so we can deliver it consistently and check it's working.
- **Checking outcomes:** we review files, complaints and feedback to check that customers who need extra support get outcomes as good as everyone else's. If they don't, we change what we do.
- **Working with others:** where it helps, and with your permission, we work with lenders, insurers and support services. We may also ask support organisations for general guidance without sharing anything that identifies you.
- **Review:** we review this policy at least once a year, and sooner if the rules change or we learn something from how it's working in practice.

9. The rules behind this policy

Rule or guidance	What it means for you
FCA Consumer Duty (Principle 12)	We must act to deliver good outcomes for you, avoid causing foreseeable harm, and support you to pursue your financial goals. We must check that our products, prices, communications and support work for all customers, including those in vulnerable circumstances.
FCA Guidance on the fair treatment of vulnerable customers (FG21/1)	Sets out what the FCA expects of firms: understanding customers' needs, training staff, adapting products, services and communications, and checking outcomes.
FCA Principles 2, 3 and 8	We must act with skill, care and diligence; run our business with proper controls; and manage conflicts of interest fairly.
FCA mortgage rules (MCOB)	Our advice must be suitable and affordable for you, with particular care over lending into retirement, interest-only and debt consolidation.
Equality Act 2010	We must make reasonable adjustments so disabled customers aren't put at a disadvantage.
Mental Capacity Act 2005	We assume you can make your own decisions unless it's shown otherwise, and we support you to make them.
UK GDPR and Data Protection Act 2018	Health and similar information gets extra protection, and we only use it fairly and for clear reasons.

10. Feedback and complaints

We'd like to hear whether our support worked for you and what we could do better. If you're unhappy with our service, please tell us and ask for a copy of our complaints procedure. We'll make any adjustments you need to make a complaint. If you're not happy with our final response, you may be able to refer your complaint to the Financial Ombudsman Service free of charge.