

# VULNERABLE CUSTOMERS

## Intermediary Support & Guidance



**Northridge**  
FINANCE

THIS DOCUMENT IS FOR SUPPORT AND GUIDANCE PURPOSES ONLY. IT DOES NOT REPRESENT ADVICE. FIRMS SHOULD ENSURE THEIR OWN POLICIES AND PROCEDURES FOR SUPPORTING VULNERABLE CUSTOMERS AS WELL AS STAFF TRAINING MATERIALS ARE REVIEWED ON A REGULAR BASIS.

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# Background

- In February 2021, the FCA published "Guidance for firms on the fair treatment of vulnerable customers"
  - The FCA definition states that "**A vulnerable customer is someone who, due to their personal circumstances, is especially susceptible to harm - particularly when a firm is not acting with appropriate levels of care**".
- Given the increased emphasis Consumer Duty places on delivering good outcomes and treating customers fairly, all firms, including intermediaries such as broker and motor dealers are required more than ever to consider characteristics of vulnerability and have appropriate policies and processes in place. Intermediaries should re-assess their current Vulnerable Customers framework to identify relevant data already available to inform policy, enable staff to provide reassurance and support to vulnerable customers and demonstrate compliance to the regulator.
- This document will provide support and guidance as well as providing links to additional sources of support that may assist you in ensuring good customer outcomes
- Much of the content will be relevant whether your customer is arranging finance or purchasing outright. The FCA expect to see the fair treatment of customers embedded as part of healthy culture throughout firms, that means not just at the point of sale but through the life-cycle of the product or service and through the whole customer journey
- Focus should be not so much if a customer has a vulnerability, but if the vulnerability they have impacts on their ability to enter into an agreement / manage that agreement without reasonable adjustments. For example someone may have had a limb amputated as a child, but in adulthood is living a full life in good employment where the fact that the customer had an amputation would have no bearing on the operation of their finance agreement (ie if customer was to call to make an enquiry on their account there would be no need for this information to be available to the agent)

# Background (continued)

- The FCA has identified (ref sections 2.4 -2.10 'Guidance for firms on the fair treatment of vulnerable customers') the four key drivers of vulnerabilities and example characteristics associated with these drivers

Health	Life Events	Resilience	Capability
Physical disability	Retirement	Inadequate(outgoings exceed income) or erratic income	Low knowledge or confidence in managing finances
Severe or long-term illness	Bereavement	Over- indebtedness	Poor literacy or numeracy skills
Hearing or visual impairment	Income Shock	Low savings	Poor English language skills
Mental health condition or disability	Relationship Breakdown	Low emotional resilience	Poor or non-existent digital skills
Addiction	Domestic abuse (including economic control)		Learning difficulties
Low mental capacity or cognitive disability	Caring responsibilities		No or low access to help or support
	Other circumstances that affect people's experience of financial services eg leaving care, migration or seeking asylum, human trafficking or modern slavery, convictions		

# TEXAS

- The Royal College of Psychiatrists and the Money Advice Trust have created a number of tools which act as a guide to working with vulnerable customers, one of which is called **TEXAS**. Its five simple steps help you through a conversation about vulnerability in a sensitive, fair and legal manner. So if a customer divulges something sensitive (for instance living with the early stages of dementia, or facing bereavement), the **TEXAS** tool can be used.

T	E	X	A	S
<u>T</u> hanks	<u>E</u> xplain	e <u>X</u> plicit	<u>A</u> sk	<u>S</u> ignpost
Thank the customer for sharing their information. Let them know that by doing so, it will enable you to make any necessary adjustments and prevent the need for them to keep repeating themselves, e.g. "Thank you for telling me about your situation as it will help us to understand how we might help."	How the information will be used including why it has been collected, who it will be shared with, and why. For example: "Let me explain how we will use the information you have given me and who we will share it with [Northridge]."	Request consent to record any sensitive information. Eg "Are you happy to give me permission to note down and save the information you've shared with me today and for me to share this with Northridge with sole purpose of assisting with the management of your vehicle purchase and/or finance agreement?"	Does your situation make it more challenging for you to manage your money and finances?" •"Does your situation make it more challenging for you to communicate with us or Northridge?" •"Does anyone help you manage your finances such as a carer, relative or other third-party?" [third party consent may be put in place]	Refer to the most appropriate internal or external help. Eg <a href="#">a range of free independent organisations for various scenarios is provided on the next slide</a>



# Signposting

## SIGNPOSTING: FREE DEBT ADVICE

Name	Region	Summary	Web address / email	Telephone
<b>Money Helper</b> (Previously known as Money Advice Service)	UK	For free, unbiased and easy to access money tools, information and advice	<a href="http://www.moneyhelper.org.uk">www.moneyhelper.org.uk</a>	0800 1387777
<b>Money Advice Scotland</b>	Scotland		<a href="http://www.moneyadvicescotland.org.uk">www.moneyadvicescotland.org.uk</a>	0141 572 0237
<b>Advice NI</b>	N. Ireland	Free, confidential and impartial debt and money advice and links to useful information provided by other orgs.	email <a href="mailto:advice@adviceni.net">advice@adviceni.net</a> or visit <a href="http://www.adviceni.net/advice/debt">www.adviceni.net/advice/debt</a>	0800 9154604
<b>Advice UK</b>	UK	Member centres offer debt advice including specialist advice for minority communities and people with disabilities	<a href="http://www.adviceuk.org.uk">www.adviceuk.org.uk</a>	0300 777 0107
<b>Christians Against Poverty (CAP)</b>	UK	For free debt advice in your home, check postcode coverage	<a href="http://www.capuk.org">www.capuk.org</a>	0800 328 0006
<b>National Debtline</b>	UK (excl N. Ireland)	Free impartial & confidential debt advice	<a href="http://www.nationaldebtline.org">www.nationaldebtline.org</a> (Select either England & Wales or Scotland options as appropriate)	0808 808 4000
<b>Stepchange Debt Charity</b>	UK	Free debt advice	<a href="http://www.stepchange.org">www.stepchange.org</a>	0800 138 1111
<b>Payplan</b>	UK	Debt advice & solutions	<a href="http://www.payplan.com">www.payplan.com</a>	0800 280 2816
<b>Citizens Advice</b>	UK (regional variations)		<a href="http://www.citizensadvice.org.uk">www.citizensadvice.org.uk</a> (Select either England, Wales, Northern Ireland or Scotland as appropriate)	Local CAB in phonebook / website
<b>Business Debtline</b>	UK	Free & confidential advice to small businesses	<a href="http://www.businessdebtline.org">www.businessdebtline.org</a>	0800 197 6026

## SIGNPOSTING: CRISIS MENTAL HEALTH (including Suicide)

Name	Region	Summary	Web address / email	Telephone
<b>Hopeline</b>	UK	Crisis response helpline service for people who are experiencing distress or despair	<a href="http://www.papyrus-uk.org">www.papyrus-uk.org</a>	<b>0800 0684141</b>
<b>Lifeline</b>	N. Ireland	Crisis response helpline service for people who are experiencing distress or despair	<a href="http://www.lifelinehelpline.info">www.lifelinehelpline.info</a>	<b>0808 808 8000</b>
<b>NHS111</b>	GB (note not NI)	For urgent medical concerns, speak to a fully trained adviser	<a href="http://www.111.nhs.uk">www.111.nhs.uk</a>	<b>111</b>
<b>Saneline</b>	UK	Emotional Support for people in mental distress	<a href="http://www.sane.org.uk">www.sane.org.uk</a>	<b>To request callback 07984967708</b>
<b>Samaritans</b>	UK	24 hr emotional support (listening service)	<a href="http://www.samaritans.org">www.samaritans.org</a>	<b>116 123</b>

## SIGNPOSTING: BEREAVEMENT SUPPORT

Name	Region	Summary	Web address / email	Telephone
<b>Cruse</b>	UK	Support for bereaved	<a href="http://www.cruse.org.uk">www.cruse.org.uk</a>	08088081677
<b>Hope Again</b>	UK	Support for young people dealing with bereavement	<a href="http://www.hopeagain.org.uk">www.hopeagain.org.uk</a>	08088081677

## SIGNPOSTING: MENTAL HEALTH & EMOTIONAL SUPPORT

Name	Region	Summary	Web address / email	Telephone
<b>Alzheimer's Society</b>	UK	Support & advice for people with dementia and their families	<a href="http://www.alzheimers.org.uk">www.alzheimers.org.uk</a>	0330 333 0804 (Gen enquiries) 0333 150 3456 (Dementia support)
<b>Rethink Mental Illness</b>	UK	Advice & Information Gen enquiries 1pm-4pm (Mon-Fri)	<a href="http://www.rethink.org">www.rethink.org</a> Outside of phone hours email: <a href="mailto:advice@rethink.org">advice@rethink.org</a>	0808 801 0525 (advice service) 0121 522 7007 (Gen enquiries)
<b>Mind</b>	England / Wales	Information and Where/How to get help	<a href="http://www.mind.org.uk">www.mind.org.uk</a> Email: <a href="mailto:info@mind.org.uk">info@mind.org.uk</a>	0300 123 3393
<b>Scottish Association for Mental Health</b>	Scotland	Information and Where/How to get help Available 9.00am to 6.00pm Mon/ Fri	<a href="http://www.samh.org.uk">www.samh.org.uk</a> email: <a href="mailto:enquire@samh.org.uk">enquire@samh.org.uk</a>	0344 8000 550
<b>INSPIRE previously (NIAMH)</b>	N. Ireland	Information and Where/How to get help	<a href="http://www.inspirewellbeing.org">www.inspirewellbeing.org</a> email: <a href="mailto:hello@inspirewellbeing.org">hello@inspirewellbeing.org</a>	028 90328474

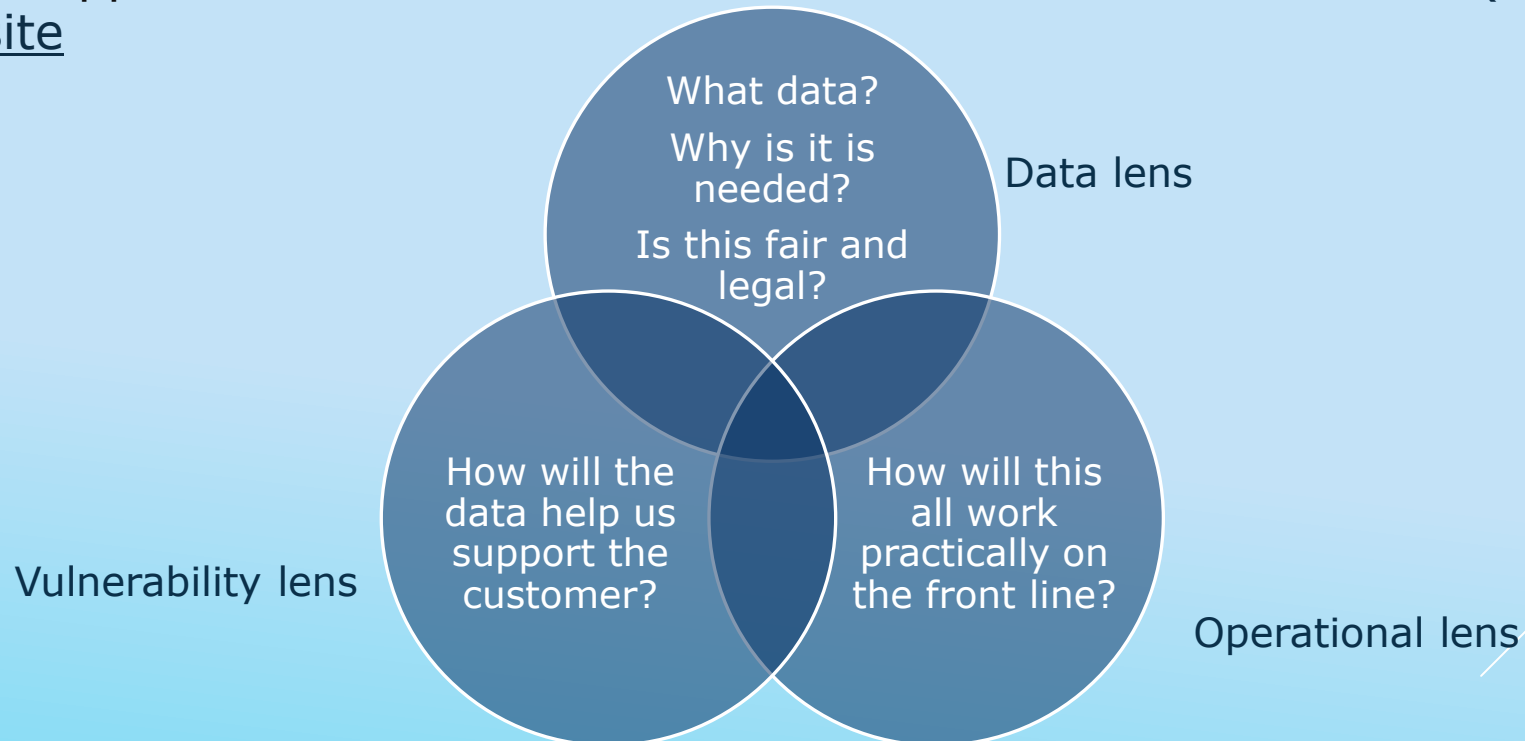
## SIGNPOSTING: OTHER HELP

Name	Region	Summary	Web address / email	Telephone
<b>AgeUK</b>	UK	Information & Support for older people (8am – 7pm every day of the year)	<a href="http://www.ageuk.org.uk">www.ageuk.org.uk</a>	0800 6781602
<b>Alcoholics Anonymous (AA)</b>	GB NI	Support for those impacted by Alcohol addiction	<a href="http://www.alcoholics-anonymous.org.uk">www.alcoholics-anonymous.org.uk</a> (GB) <a href="http://www.alcoholicsanonymous.ie">www.alcoholicsanonymous.ie</a> (NI)	0800 9177650 (GB) NI – Google and obtain number for local group
<b>Macmillan Cancer Support</b>	UK	Support for those impacted by cancer	<a href="http://www.macmillan.org.uk">www.macmillan.org.uk</a> (information & Support)	0808 808 0000
<b>Gamcare</b>	UK	Advice and support for anyone affected by gambling	<a href="http://www.gamcare.org.uk">www.gamcare.org.uk</a>	0808 8020 133
<b>Turn2Us</b>	UK	Benefits and Grants search	<a href="http://www.turn2us.org.uk">www.turn2us.org.uk</a>	0808 802 2000
<b>Civil Legal Advice</b>	UK	You may get legal aid if your home is at risk	<a href="http://www.gov.uk/legal-aid">www.gov.uk/legal-aid</a>	0345 345 4345
<b>Shelter</b>	England	Housing specialists	<a href="http://england.shelter.org.uk">http://england.shelter.org.uk</a>	0808 800 4444
<b>Shelter</b>	Scotland	Housing specialists	<a href="http://scotland.shelter.org.uk">http://scotland.shelter.org.uk</a>	0808 800 4444
<b>Shelter</b>	Wales	Housing specialists	<a href="http://www.sheltercymru.org.uk">www.sheltercymru.org.uk</a>	0800 0495 495
<b>Housing Advice NI</b>	NI	Housing specialists	<a href="http://www.housingadviceni.org">www.housingadviceni.org</a>	028 9024 5640

For additional support and guidance / if you have identified a vulnerable customer, please contact the Northridge new business processing team on 0344 8921845

# Vulnerability, GDPR and practical implications

- The Money Advice Trust and Money Advice Liaison Group (MALG), have also published amore detailed series of guides to help firms meet data protection regulations and support customers in vulnerable circumstances. The guides are designed to help understand the overlap between GDPR and vulnerability, and strike the right balance between human experience and data.
- This information provides detailed useful guidance to firms to aid with considerations on how to best support vulnerable customers and can be [accessed on their \(Money Advice Trust\) website](#)



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# Physical Disability

- Physical disabilities can manifest in various ways, and it is essential to consider a customer's disability in order to offer the most effective support. For instance, a customer who is deaf may need particular assistance.
- Per slide 3, the focus should be not so much if a customer has a vulnerability, but if the vulnerability they have impacts on their ability to enter into an agreement / manage that agreement without reasonable adjustments. For example someone may have had a limb amputated as a child, but in adulthood is living a full life in good employment where the fact that the customer had an amputation would have no bearing on the operation of a potential finance agreement (ie if customer was to call to make an enquiry on their account there would be no need for this information to be available to the agent)
- Some disabilities by their nature may result in Northridge being able to provide an agreement. For example a blind / partially sighted person's eyesight may be such that they are unable to obtain a driver's licence which would be a pre-requisite for entering into a hire purchase agreement for a vehicle.
- However if in doubt you should contact Northridge to ascertain if there are alternatives or additional that can be considered that may enable us to help the customer



# Deaf / Hard of Hearing

- **Relay UK**
- Relay UK helps people with hearing and speech difficulties communicate over the phone. Deaf/ Hard of Hearing customers can use Relay UK with a textphone or by downloading the app to their smartphone, tablet or PC. They then dial 18001 followed by the Northridge number they want to call.
  - Sales – (18001) 0800 9170922. For customers in dealerships, and the customer uses this service, applications will be processed under the dealer Northridge reference number
  - Customer Services – (18001) 0800 917 0931
  - Financial Support & Assistance – (18001) 0800 917 0932
- There is no additional charge for using Relay UK, but customer will still have to pay as normal for the phone calls they make. When customers call Northridge using Relay UK a Relay assistant will type back to them what our staff member is saying. They can reply by speaking or typing their response.
- Relay UK are a third party. You will be subject to their terms and conditions. **[Click here to find out more information and visit the Text Relay UK website.](#)**

# Mental Capacity (decision making)

- The FCA define ([CONC 2.10.3](#)) mental capacity as *“a person's ability to make a decision. Whether or not a customer has the ability to understand, remember, and weigh up relevant information will determine whether the customer is able to make a responsible borrowing decision based on that information.”*
- This covers situations that can affect a person's ability to make choices, such as having low reading or numeracy skills, dementia, or problems with drugs and alcohol. When someone with mental capacity challenges and/or limitations applies for finance (or more generally buying a car), if they don't get the proper support, they might end up borrowing money without fully understanding it, forgetting that they borrowed it, or even not realising they have to pay it back. It's important to believe that a customer can make their own decisions, but you should also look for signs that they might not be able to.
- Having a mental capacity challenge and/or limitation does not always equate to having a mental health issue, although in some instances there may be an overlap
- Use the **BRUCE** tool to identify and support customers who may have problems with decision making
- The Money Advice Trust created a support guide ([“Decision-making when purchasing a vehicle”](#)) which is tailored specifically for motor dealers and expands further on BRUCE (extracts from this guide are on next page), but also provides some case study scenarios

# BRUCE

## Using BRUCE to identify problems

### Behaviour

Do not wait for a customer to tell you about a decision-making problem.

They may be embarrassed. They may worry that you will decline any application for finance. They may be unaware they have a problem.

We therefore look for clues in a customer's behaviour and speech.

### Remembering

A customer needs to be able to remember information to make a decision. Look out for when the customer:

- is unable to recall information
- is unclear about what is being discussed with them
- gives conflicting answers to questions
- asks the same questions repeatedly
- is unaware of their own financial situation
- easily loses the thread of the conversation

### Understanding

If a customer cannot understand the information they are given, they are not in a position to make a decision.

Look out for when the customer **doesn't**:

- understand what they are applying for
- understand aspects of the purchase (e.g. repayment terms)
- provide answers to relevant questions

### Communication

Customers must be able to communicate their decisions in a way that is understandable. Look out for customers who **cannot**:

- tell you basic personal information
- express their decision or choices
- directly answer your questions (or do not do this)

### Evaluation

Customers will have a number of choices to evaluate or 'weigh-up'.

For example, they might be given a lower monthly repayment figure over a longer period, or a higher repayment over a shorter period.

And they have the 'big decision' of whether to purchase the vehicle too. Look out for customers who are struggling to do this.

If a customer doesn't understand the options on offer, or just cannot reach a decision, they may have an issue with evaluation.

## Using BRUCE to Support customers with problems

### B of BRUCE: Behaviour

We can start by thinking about our own behaviour.

- Knowing your products, arrangements, and offers is key. If you really understand these, it will make your explanations much clearer. Take pride in turning something complex into something simple.
- Using simple language, avoiding jargon, and not rushing is vital. When explaining a product, break it into chunks (e.g. talk about repayments, check customer understanding, and then move to the next feature).
- Never make decisions for a customer – it is their decision, not ours.

### Behaviour

### R of BRUCE: Remembering

We then think about how to overcome any problems with memory by:

- Repeating key information, or simplifying information for customers.
- Offering alternative ways of giving information (e.g. a written summary or rephrasing of what has been said, or the available options).
- Asking whether someone the customer knows could help them.
- Asking the customer what else could be done to help them.

### Remembering

### U of BRUCE: Understanding

Understanding is key – we can provide support to customers by:

- Asking them to summarise what they've been told (to establish what they might not have understood).
- Repeating information to customers in different ways.
- Summarising and simplifying information where possible (but retaining any regulatory or legal detail that is required).

### Understanding

### C of BRUCE: Communication

In addition to the above, we can think about:

- Offering the involvement of a third party to assist.
- Allowing more time for the customer to communicate with us.

### Communication

### E of BRUCE: Evaluation (weighing-up)

In addition to the suggestions above, we can also think about:

- Discussing each option individually.
- Taking the customer through a series of logical steps to aid their thought process.

### Evaluation

# BRUCE

## Using BRUCE: golden principles

In using BRUCE, there are four 'golden principles' you need to bear in mind.

**1. Always presume that every customer has the ability to make a decision, but always look for signs of a problem.**

Taking this step means we give every customer 'a clean slate' – we presume they can make a decision, but we still keep a look-out for difficulties.

This stops us wrongly assuming that some customers (such as disabled people) can't make their own decisions.

Where signs of difficulty do exist, we always find out more about these by asking the customer. This allows us to help the customer overcome these problems, and make their own decision.

Critically, we **never** make a decision for a customer – this is theirs alone to make.

**2. Reasonable support is always given.**

This means you are **not** expected to provide the customer with never-ending support, or have to meet unrealistic or unreasonable requests for adjustments.

It also means that if you think a customer is experiencing serious problems with decision-making, then it is acceptable to **pause** or **stop** the vehicle purchase.

You can then involve a manager in the discussion. They will help you decide if support can be provided, or whether another option is needed (such as third-parties or external agencies).

**3. Customers are allowed to make unwise decisions.**

If a customer makes a decision you consider unwise or poorly thought out, but no indicators exist of a problem (remembering, understanding, communication or evaluation), **then this is the customer's decision.**

This may be frustrating but our role is not to make decisions for the customer, but instead to support their decision-making.

**4. We may have only one chance to help a customer – so we need to take this.**

If you see a customer is having difficulties with decision-making, you need to act.

You may be the first person to spot this – and if you do not take action, then you cannot assume that others will.

If you do not act, the customer could then go on to make a purchase:

- they do not understand
- they cannot repay
- that leads to a vehicle being returned or taken back
- that leads to later financial difficulty.

Taking action is not only about helping the customer at that point in time.

It is also about recording any relevant information (with the customer's consent) that needs to be shared with colleagues or the finance company.

For additional support and guidance / if you have identified a vulnerable customer, please contact the Northridge new business processing team on 0344 8921845



# Mental Health

- Mental health is the way we think and feel. Mental health problems are when difficulties get in the way of how we think and feel. This can mean it is hard to cope with family life, relationships, school or the wider world
- Examples of mental health challenges/limitations, as per UK mental health charity Mind ([www.mind.org.uk](http://www.mind.org.uk)) or shown below

<a href="#">Anger</a>	<a href="#">Obsessive-compulsive disorder (OCD)</a>	<a href="#">Seasonal affective disorder (SAD)</a>
<a href="#">Anxiety and panic attacks</a>	<a href="#">Panic attacks</a>	<a href="#">Self-esteem</a>
<a href="#">Bipolar disorder</a>	<a href="#">Paranoia</a>	<a href="#">Self-harm</a>
<a href="#">Body dysmorphic disorder (BDD)</a>	<a href="#">Personality disorders</a>	<a href="#">Sleep problems</a>
<a href="#">Borderline personality disorder (BPD)</a>	<a href="#">Phobias</a>	<a href="#">Stress</a>
<a href="#">Depression</a>	<a href="#">Postnatal depression &amp; perinatal mental health</a>	<a href="#">Suicidal feelings</a>
<a href="#">Dissociation and dissociative disorders</a>	<a href="#">Post-traumatic stress disorder (PTSD)</a>	<a href="#">Suicide attempt - how to cope after</a>
<a href="#">Eating problems</a>	<a href="#">Premenstrual dysphoric disorder (PMDD)</a>	<a href="#">Tardive dyskinesia</a>
<a href="#">Hearing voices</a>	<a href="#">Psychosis</a>	<a href="#">Trauma</a>
<a href="#">Hoarding</a>	<a href="#">Recreational drugs, alcohol and addiction</a>	
<a href="#">Hypomania and mania</a>	<a href="#">Schizoaffective disorder</a>	
<a href="#">Loneliness</a>	<a href="#">Schizophrenia</a>	



# Mental Health (continued)

- Mental health challenges and/or limitations can be short, medium or long term. For example stress may be short or long term, whereas bipolar disorders are more likely to be long term health issues
- When someone is going through emotional pain, like losing a loved one, it can temporarily make it hard for them to decide on things. If you notice a customer acting this way, remember to use the advice we shared earlier about helping customers who are struggling. Sometimes, it might be best for them to wait before making a choice.
- There is no expectation that you diagnose mental health conditions. If a customer makes you aware of a mental health challenge and/or limitation it is important that you follow the TEXAS protocol detailed earlier in this pack

# Financial / Economic abuse

- This occurs when someone attempts to control another's ability to acquire, maintain access to, or use money or other economic resources on a sustained basis. This can include behaviour such as stopping someone from working, taking someone's money, preventing someone from accessing their own or joint bank accounts, or putting debts, including car finance agreements in their name.
- 16% of adults in the UK has experienced economic abuse by a current or former partner (Source: [Refuge, 2020 Know Economic Abuse](#) report). But anyone can experience financial or economic abuse, whatever their age or personal circumstances
- Identification of customers who may be experiencing financial / economic abuse is not always obvious, but as intermediaries / motor dealers there are certain things you can look out for that might indicate customer is under duress, such as:
  - Is the vehicle being purchased consistent with their profile and current vehicle (eg An elderly person trading in a low value vehicle with low monthly instalments for a premium sports car vehicle with significantly higher instalments)?
  - Is there another person with the customer who they may often appear to defer to? Does the customer look at ease with this person?
  - Is the customer clear on why they have picked a particular car?

# Financial / Economic abuse – other signs

- Outside of a car purchase specific scenario, the following are more general signs that may indicate potential financial abuse
  - Worried or anxious for no obvious reason
  - Nervy/jumpy
  - Mention that they are not sleeping/have a change in sleeping pattern
  - Reluctance to talk openly
  - Avoiding contact - eye physical or other with carer or service provider
  - Looking for approval from another person before answering/responding
  - Contradictory statements, not from lack of mental capacity
  - Attacks of shaking/trembling or crying
  - Rigid posture
  - Waiting for another person to answer on their behalf despite being capable
  - Irritable or easily upset
  - Afraid of one or many persons
  - Depressed or withdrawn
  - Suicidal thoughts/comments

**What to do: Contact Northridge immediately if you think an applicant or customer may be suffering as a result of financial / economic abuse**

For additional support and guidance / if you have identified a vulnerable customer, please contact the Northridge new business processing team on 0344 8921845

# Financial Difficulties

- People with low income or financial struggles might be at greater risk if they borrow more money
- The Northridge affordability assessment is designed to help us identify customers who may struggle with repayments, thereby preventing them from borrowing beyond their means. However, if a customer indicates they are experiencing financial difficulties that are not evident in the information submitted as part of the application, please inform us right away. This will allow us to make a fair lending decision that does not intensify their financial difficulties.
- Under NO CIRCUMSTANCES should you, as an intermediary, manipulate customer or vehicle data submitted as part of an application with a view to increasing likelihood of approval of facilities. If subsequently discovered this may be recorded with UK Fraud agencies and Northridge is obligated to report the Intermediary to the FCA as a breach of their Principles of Business

# Challenges and/or limitations due to age

- Young Adults
  - Research from May 2023 shows that only 2 out of 5 young people are financially literate
  - Additional time and care should be taken to ensure young customers who may have less experience with financial products fully understand the product and the financial commitment they are entering into
- Elderly Customers
  - As we get older, we are more likely to suffer from cognitive decline which may impact mental capability or experience mental health challenges or limitations such as dementia. In addition, they may be more susceptible to life events such as bereavement or illness that may render them vulnerable.
  - Elderly customers may be more prone to financial abuse, especially by family members. Refer to the Financial / Economic abuse section of this pack.
  - However we need to be careful not to exclude elderly customers from obtaining financial services, but be aware of the practical implications for the customer, and perhaps spending more time on the 'change of circumstances' section of the credit application (eg if changes to pension foreseen; driving licences for over 70's are valid for 3 years, would customer see any reason why it may not be renewed [leaving them with a car they would be unable to drive] etc)



# Further Guidance / Contacting / Advising us

- First step should be to review your own Business Vulnerable Customer processes and/or speak to your vulnerable customer subject matter expert for guidance
- You can speak to one of our new business processing team on 0344 8921845 who, if unable to answer your query straight away, will do best to revert within 2 hours. This is available Monday – Friday, excluding bank holidays 9:00am to 5:00pm. More complex enquiries may take longer
- At application stage, make us aware of any vulnerability by either contacting new business processing team on 0344 8921845 or selecting the 'change in circumstances' indicator and adding a note with the application ("Support Needed <<details>>")
- Ensure that where required that you obtain eXplicit consent (per the 'X' in [TEXAS](#) tool). You may already have a process to do this compliantly, but a skeleton document is provided on next slide. This can be shared with Northridge via normal secure document upload channel. This should not be emailed unless it is encrypted. Password for encryption should be telephoned through to Northridge
- Customers may also wish to provide explicit consent directly to Northridge. This can be done by calling the customer services line 0800 9170931 (Monday – Friday, excluding bank holidays 9:00am to 5:00pm)

# How to tell us your Customer needs additional support

We aim to provide good customer outcomes for all our customers and support them through the term of their agreement. To help us do that it is important to tell us when a customer needs some additional support.

While we continue development on a digital solution, please follow the interim process below.

## At Application:

### 1. Application Input

- Input the customer application information as normal

### 2. Notification Box

- If the customer needs some additional support tick the '**Change of Circumstances**' box

### 3. Notes

- It is important to add a note giving us the support details
- Note must state '**SUPPORT NEEDED**' If you know the support needed, please tell us. e.g. *customer has hearing difficulties and requests that any phone contact uses the Relay UK service*

## After Application Submission:

You can speak to one of our New Business Processing team on 0344 892 1845 and ask them to add the details to the application for you.

## General Queries:

If you have any general questions unrelated to a live application, please email [vc@northridgeuk.com](mailto:vc@northridgeuk.com)

# Sample skeleton provision of consent template

<<Customer Name>>  
<<Customer address>>  
  
<<Date>>  
  
To: <<Intermediary Name>>  
  
Purchase of <<Vehicle Details>>  
Northridge Finance reference <<Agreement number>>  
  
I have advised <<intermediary name>> of the following information:

<<High level overview of support or adjustment required>>

- I consent with this information being recorded by <<intermediary Name>> in order that they can provide necessary support that may be required regarding the purchase of the above goods.
- I also consent to <<Intermediary name>> sharing this information with Northridge Finance so that they are aware and can provide the necessary support / adjustments with regards the operation of the above finance agreement / application.

Full details on how information will be used can be found at:

<<Intermediary Privacy Notice>>  
Northridge Privacy Notice ([www.northridgefinance.com/yourdata](http://www.northridgefinance.com/yourdata))

Signed: \_\_\_\_\_  
Date: \_\_\_\_\_

Customer name and address  
Todays date  
Intermediary name (and address)  
Details of Goods being funded  
Northridge agreement number (if available)  
Intermediary name (and address)  
High level overview of support that may be required (eg I have hearing difficulties, so prefer to communicate via Relay UK)  
Intermediary name (and address)  
Details on where customer can obtain Intermediary Privacy Notice  
Customer signature and date

For additional support and guidance / if you have identified a vulnerable customer, please contact the Northridge new business processing team on 0344 8921845