

Workshop: identifying and supporting public service users in vulnerable circumstances

Workbook



Acknowledgements

These developmental resources were produced following two workshops held in Edinburgh and Belfast in the course of 2023. The workshops included colleagues with first-hand experience of supporting and working with people in vulnerable circumstances, including public service providers, advice and advocacy bodies, and charities and NGOs working with particularly vulnerable individuals and groups. The aim of these workshops was to better understand lived experiences of vulnerability and the strategies that may be effective in helping public service providers to identify and support those who are in vulnerable circumstances.

We would like to thank all those who participated in the workshops for contributing their time and expertise and providing the insights on which these resources are based. We would particularly like to thank those who agreed to be filmed for the videos, who were very generous in sharing their particular understanding of, and approaches to, supporting service users experiencing vulnerability: Geraldine Hanna (Commissioner for Victims of Crime), Christine Kearney (Autism NI), Graham Smith (Consumer Council for Northern Ireland), Conor Lawell (Dementia NI), Janine Toner and Natasha Palmer (Barnardo's NI Refugee Support Service).



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Introduction

This workbook is designed to accompany, and be used as part of, the workshop on Identifying and Supporting Public Service Users in Vulnerable Circumstances. You can also use the workbook for individual self-study, if you wish.

The overall aim of the workshop is to create an opportunity to share experiences and influence the development of a more person-centred public service provision, which is attuned and responsive to people's individual circumstances and the wide range of situations in which users of public services might experience vulnerability.

This workbook accompanies the presentation slides and contains the tasks to be completed in the workshop. There is space for taking notes and the extracts in the workbooks will also be useful for future reference.

If you have any queries about the workshop and what will happen on the day, please reach out to the person who is hosting the workshop.

Task 1: What is vulnerability?

The following extracts and summaries are relevant to **task 1** which involves thinking about the definition of vulnerability and what it means in terms of your specific organisation and public service delivery setting.

This part of the workshop involves:

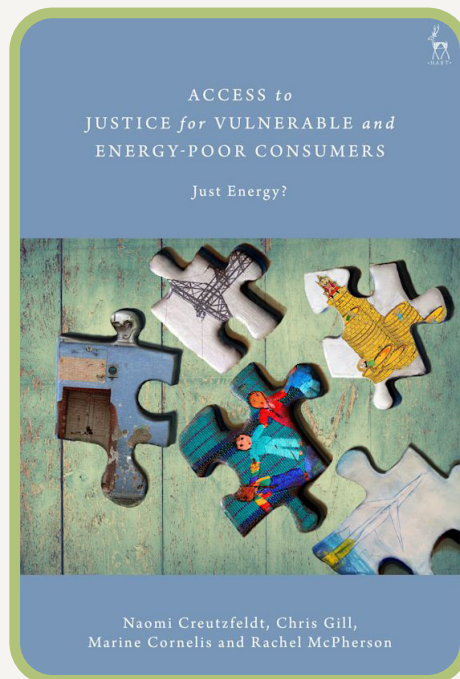
- Watching a video showing public service and third sector stakeholders discussing vulnerability and a short animation.
- Reading the extracts/ summaries below in which definitions of vulnerability, examples, and issues are discussed.
- Discussing what vulnerability means to you in the context of your organisation and service users.



Once you have been shown the video and read the extracts/ summaries below, your workshop facilitator will ask you to discuss the following questions:

- What aspects of the definitions provided in the video(s) and in the workbook resonated with you?
- Are the definitions of vulnerability used in consumer settings a helpful starting point? How could they be adapted to suit public services?
- Is the language of “vulnerability” appropriate in your context? If not, what language do you use to try to identify service users who may need extra help and support?
- Can you come up with a working definition of public service users in vulnerable circumstances?

(A) Extract from – Access to Justice for Vulnerable and Energy Poor Consumers – by Naomi Creutzfeldt, Chris Gill, Marine Cornelis, and Rachel McPherson, Bloomsbury Publishing (2021).¹



Consumer Vulnerability

A growing consumer vulnerability literature has been concerned with the way in which vulnerability should be defined. A consumer is vulnerable when personal circumstances and characteristics combine with aspects of the market to create situations where the consumer is significantly less able than a typical consumer to protect or represent his/her interests in the energy market; and/or significantly more likely than a typical consumer to suffer detriment, or that detriment is likely to be more substantial. The multidimensional nature of vulnerability is demonstrated in the European Commission's recently issued definition [see below], which argues that vulnerability refers to those consumers who are at higher risk of detriment as a result of their socio-demographic characteristics, behavioural characteristics, personal situation, or market environment. The large spectrum between a short-term passing state (situational) and a permanent feature of someone's daily life (structural/ systemic) makes vulnerability a challenging element to identify and act upon. Increasingly, the concept of vulnerability is enshrined in law and regulation, although it remains unclear to what extent the concept is leading to additional protections in practice for certain individuals and groups [...]

¹ Contextual note: This book is the product of a major Economic and Social Research Council funded project examining the experiences of people in vulnerable circumstances in the context of the energy market. This project has provided the foundations for starting to think about vulnerability in relation to public service users, an area that has not yet been subject to much attention by either policymakers or academics.

[The European Commission's] report on consumer vulnerability across key markets in the EU found a vulnerable consumer to be someone who, as a result of socio-demographic characteristics, behavioural characteristics, personal situation, or market environment:

- Is at higher risk of experiencing negative outcomes in the market.
- Has limited ability to maximise their wellbeing.
- Has difficulty in obtaining or assimilating information.
- Is less able to buy, choose or access suitable products.
- Is more susceptible to certain marketing practices.

The report goes on to describe vulnerability drivers in each of these areas. Market-related drivers include being unable to read contract terms and conditions and being disengaged from markets (for example, in terms of not knowing contract conditions, or not reading communications). Behavioural drivers concern consumers' basic orientations: more impulsive consumers are, on the whole, more likely to be vulnerable on several dimensions, while consumers who are unwilling to take risks are generally less vulnerable. Among the situational drivers, finding it difficult to make ends meet and having friends who cannot make ends meet, are found to be especially important. Among the access-related drivers, using the internet less frequently than once a month is linked to consumer vulnerability on several dimensions. And, finally, some demographic characteristics, such as both young and old age, and having a mother tongue different from the official language, are linked to consumer vulnerability.

(B) Summary of insights and issues relating specifically to vulnerability in Northern Ireland

A **Consumer Council report** in 2019 highlighted that socio-economic indicators show that Northern Ireland is a more vulnerable society than the rest of the UK. Consumers in Northern Ireland are poorer, are less financially resilient with lower financial capability, savings, wages, higher levels of debt, spend more on energy compared to GB consumers and suffer persistently high levels of fuel poverty.

Northern Ireland is also a society emerging from conflict and the levels of unmet need and vulnerability which is the legacy of 'Troubles' related trauma on the population's mental health and well-being is becoming increasingly recognised. Northern Ireland is also becoming more diverse. The 2021 Census shows that 3.45% of the population identified as non-white and 6.5% of the population were born somewhere other than UK or Ireland. This population may also experience vulnerability, not only through language but because service providers do not understand their culture, past trauma or recognise their social isolation.

Public bodies and anyone involved in service delivery in NI will be aware of their Section 75 duties. Section 75 of the Northern Ireland Act makes equality of opportunity and good relations central to policy making and service delivery and encourages public authorities to demonstrate measurable, positive impact on the lives of those experiencing inequalities.

Whilst Section 75 duties do not generally refer to 'vulnerability' these groups have been specifically identified in recognition that without due regard to equal opportunity - they may experience inequality or vulnerability in accessing public services.

Section 75 requires public authorities to have due regard for the need to promote equality of opportunity between:

- persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation
- men and women generally
- persons with a disability and persons without
- persons with dependants and persons without

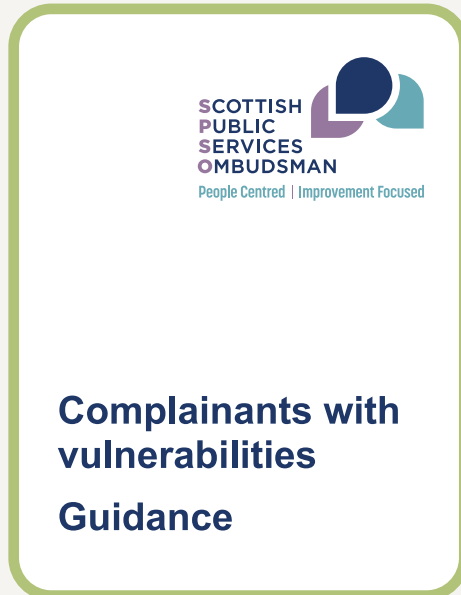
The promotion of equality of opportunity entails more than the elimination of discrimination. It requires proactive action to promote equality of opportunity and encourages public authorities to take action to address inequality among the groups listed above.

More information and resources about Section 75 Duties in Northern Ireland can be found on the Equality Commission website **ECNI – Section 75 duties for Public Authorities - Equality Commission NI (equalityni.org)**.

Depending on the nature of the public service being delivered, the understanding and focus of what vulnerability is can differ.

For example, the Police Service of Northern Ireland (PSNI) recognises the 13 strands of vulnerability as defined by the College of Policing. The strands are – domestic abuse, child abuse, child sexual exploitation, adult sexual exploitation, stalking and harassment, female genital mutilation, honour-based violence, forced marriage, adults at risk, management of sexual and violent offenders, serious sexual offences, modern slavery and human trafficking, and missing and absent people. **Vulnerability 28 April 2023.pdf (psni.police.uk)**.

(C) Extract from the Scottish Public Services Ombudsman's Complainants with Vulnerabilities Guidance.²



Potential vulnerabilities to consider include, but are not limited to:

- Learning difficulties;
- Mental health problems;
- Physical disabilities;
- Poor literacy or numeracy skills;
- Digital exclusion (lack of technology or know-how to access online services);
- Chronic or terminal illnesses;
- Addiction issues;
- Being a person with a conviction;
- People fleeing domestic abuse;
- Being a young person leaving local authority care;
- Being a kinship carer;
- Being a lone parent;
- Experiencing separation, relationship or family breakdown;
- Having responsibility as a main care giver;
- Homelessness or threat of homelessness;
- Having an unsettled way of life; and
- Leaving the armed forces.

² Contextual note: This guidance outlines the SPSO's commitment to identifying and supporting people in vulnerable circumstances and provides guidance about how they will do this. As part of this guidance, the SPSO provides a list of examples of vulnerabilities which are based on the Statutory Guidance for the Scottish Welfare Fund.

Task 2: Identifying service users who may be in vulnerable circumstances

This part of the workshop involves:

- Watching a video showing public service and third sector stakeholders discussing how they identify service users in vulnerable circumstances.
- Reading the extracts below in which tips are provided for how to identify individuals who are experiencing vulnerability.
- Discussing what tools you currently use to identify service users in vulnerable circumstances and identifying areas for future development.

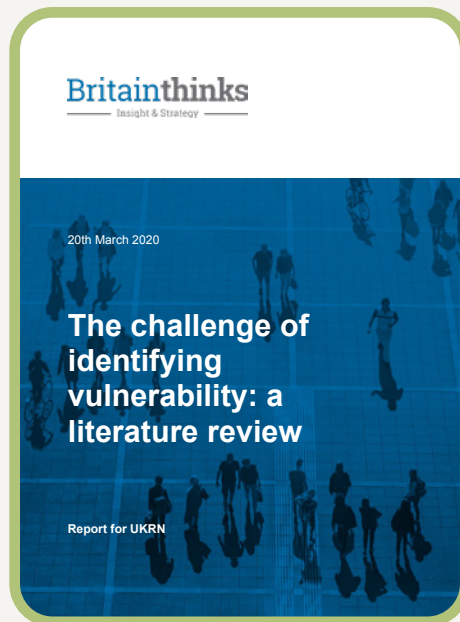
Identifying Service Users Experiencing Vulnerability



Once you have watched the videos and read the extract below, your workshop facilitator will then ask you to discuss the following questions:

- Reflect on challenging experiences you have had in terms of identifying whether someone was in vulnerable circumstances. What makes this issue so challenging?
- What examples of good practice are you aware of in terms of approaches to identifying people in vulnerable circumstances?
- To what extent do you currently use either self-disclosure or proactive-identification strategies to identify people?
- What can you learn from the UK Regulators Network's suggested approach to identifying vulnerability?

(A) The UK Regulator Network's literature review on identifying vulnerable consumers (2020).



2.1 Self-disclosure

Self-disclosure is a process of communication by which an individual reveals specific vulnerabilities and other information about themselves to a firm. This method of identifying vulnerability means relying on the individual to share details about themselves.

How this often works in practice is that consumers may be asked to complete an online self-evaluation when joining a new service provider or answer a series of questions over the telephone which cover personal information such as age, disability, long-term health conditions, etc. This may also involve an open-ended question about whether the individual may require additional support or assistance when using the service. The intention behind this type of open question is to provide an opportunity for the individual to elaborate on their previous responses and/or discuss additional requirements and support needs, which often leads to self-disclosure of other vulnerabilities (Ofcom, 2017) [...]

2.2 Proactive identification

In recognition of limitations to self-disclosure many firms have recently shifted to different forms of proactive identification. Proactive identification involves firms taking active steps to encourage individuals to self-disclose their vulnerabilities, and in cases where self-disclosure is not happening, using different techniques to infer and observe consumer vulnerability.

Whilst proactive identification is necessary to identify consumers who do not self-disclose their existing vulnerabilities, it is also important for identifying pre-vulnerable (or potentially vulnerable) consumers.

There is no uniform approach for how proactive identification works in practice. Instead there are a number of different strategies that firms can adopt [...]

- Direct application support: direct interventions to help an individual with self-disclosure.
- Frontline call staff: improving the quality of telephone conversations with consumers about difficult situations and wider circumstances for identifying wider contextual vulnerabilities and encouraging self-disclosure.
- Monitoring behavioural patterns and change: more recently firms are exploring different ways of analysing consumer data to monitor an individual's wider circumstances and how they may be changing to identify who is most at risk and when.

In addition to identifying these two broad strategies for identifying people in vulnerable circumstances, the UKRN report sets out a practical tool that can be used for frontline staff:

An approach to spotting behavioural signs of vulnerability on the phone

The **BRUCE** protocol is used by some firms as a method for identifying and spotting customers with decision-making difficulties. 'BRUCE' is an acronym for:

- I. **B**ehaviour and talk - staff should monitor customer's behaviour and talk for indications of difficulties.
- II. **R**emembering – is the customer exhibiting any problems with their memory or recall?
- III. **U**nderstanding – does the customer grasp or understand the information given to them?
- IV. **C**ommunicating – can the customer share and communicate their thoughts, questions and decisions about what they want to do?
- V. **E**valuating – can the customer 'weigh-up' the different options open to them?

Task 3: Providing support to services users identified as being in vulnerable circumstances

This part of the workshop involves:

- Watching a video showing public service and third sector stakeholders discussing how they support service users in vulnerable circumstances.
- Reading the extracts below in which approaches to supporting service users in vulnerable circumstances are discussed.
- Discussing how you currently support service users in vulnerable circumstances and identifying areas for future development.

Supporting Service Users Experiencing Vulnerability



After watching the videos and reading the extracts below, please discuss the following questions:

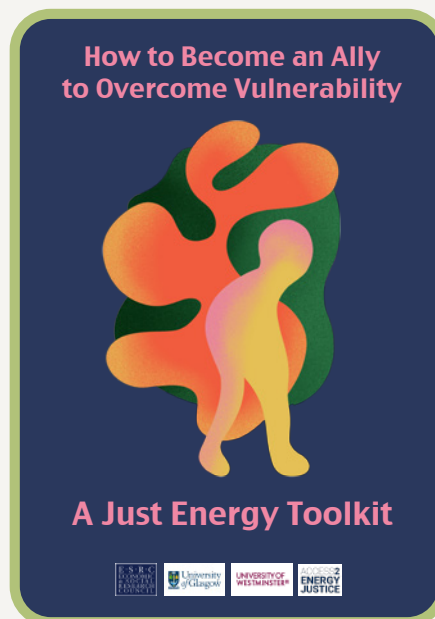
- What do you do to support service users who have been identified as being in vulnerable circumstances?
- Are the services you provide designed to meet the needs of people who are in vulnerable circumstances?
- How could services be designed – or adapted – to better meet such service users?
- Is there potential for collaborative working with third sector organisations providing advice and advocacy services to help enhance support for users in vulnerable circumstances?

(A) The Northern Ireland Consumer Council response to the utility regulator consultation on consumer vulnerability (2019).



“While identification is difficult, and provides challenges to be overcome, it is the first step rather than an achievement in its own right – “identification simply creates the opportunity to find out more about the consumer’s vulnerable situation, and to provide the relevant support”.

(B) Just Energy toolkit, aimed at those handling complaints in the energy sector who are working with service users experiencing vulnerability (2021).



- **Recognising** and **acting** on vulnerability is vital to create fairer marketplaces and fairer public services.
- Much service provision is unable to individualise services to fit the **needs** of individual consumers.
- Complaint **handling** provides organisations with an opportunity to consider individual issues in more depth.
- Complaint handlers are in an excellent position to **identify** vulnerabilities and act flexibly.
- Complaint handling can be **transformative** if organisations treat individuals’ experiences as opportunities to learn and improve.

Be Aware – Be Mindful – Speak Clearly

- Be aware of signs of vulnerability.
- Listen empathetically to identify needs.
- Adapt processes and outcomes to fit needs.
- Cooperate with other service providers to create a caring environment.
- Set clear strategies to tackle vulnerability within an organisation.
- Create a learning culture around complaints and vulnerability.

Responding to vulnerability: How to respond to expressions of unease

If vulnerabilities are identified, the next challenge involves determining how to act upon them. Language can tell you a lot about the person's condition, how to respond to the expression of unease and overwhelming feelings.

When you hear	How they feel	How you could respond
"They are robbing us"	Anger and aggressivity	Listen and offer solutions
"There is no way you can help me"	Confusion	Listen and offer options; signpost
"I'm sorry I think I've put myself in this position"	Shame	Listen and support

Identifying vulnerability may require a particular service adaptation e.g.

- if a **learning disability** is disclosed, a person may need more time to respond to requests for information;
- if an individual is **elderly** and seems confused, a complaint handler may recommend that a friend or relative helps them make their complaint;
- if an individual appears **agitated, angry or frustrated** on the phone, other means of communication may be recommended.

There may also be **no formal adaption** required in a complaint handling process. Instead, it may merely require awareness, sensitivity, and empathy in helping the individual.

(C) Northern Ireland Electricity Networks, vulnerable customer leaflet, “we are able to help”.



This leaflet sets out some of the ways in which the Northern Ireland Electricity Networks can support people experiencing vulnerability, including:

Medical Customer Care Register

If you, or someone you know, relies on electricity for healthcare needs, you can join our Medical Customer Care Register to get extra support during a power cut. You can sign up online or call us on 03457 643 643.

JAM Card³ Friendly

We are a JAM Card friendly organisation. Our teams are trained to support customers with learning difficulties, autism or communication barriers, by giving them ‘just a minute’.

Dementia Friendly

Employees who answer your calls, letters or emails, are trained as ‘Dementia Friends’ so they can recognise the support needed and help in small ways.

Relay UK

We use the Relay UK service to help customers with hearing and speech difficulties contact us by telephone. Visual Impairment – We have facilities on our website to increase text size, change the colour of the background or read text aloud to help those customers with visual impairment or reading difficulties.

³ The JAM Card allows people with a hidden disability like autism or communication barrier tell others they need ‘Just A Minute’ discreetly and easily.

Further information and feedback

Please send feedback on how you found these developmental resources and whether they have been useful. We would very much value your feedback. Please email Professor Chris Gill at chris.gill@glasgow.ac.uk

You may find the following resources useful.

A.I.M: fermanaghomagham.com

College of Policing. 2021. Identifying Vulnerability Guidelines:

<https://www.college.police.uk/article/identifying-vulnerability-new-guidelines-support-police>

Competition and Markets Authority. 2018. Vulnerable Consumers: Challenges and Solutions:

<https://www.gov.uk/government/publications/vulnerable-consumers/vulnerable-consumers-challenges-and-solutions>

Consumer Council for Northern Ireland Consultation Response. 2019. FCA Vulnerable Consumer Guidance Consultation: <https://www.consumercouncil.org.uk/sites/default/files/2019-10/FCA%20Vulnerable%20Consumer%20Guidance%20Consultation%20-%202026%20September%202019%20-%20CCNI%20Response.pdf>

<https://www.consumercouncil.org.uk/sites/default/files/2019-10/FCA%20Vulnerable%20Consumer%20Guidance%20Consultation%20-%202026%20September%202019%20-%20CCNI%20Response.pdf>

Domestic and Sexual Violence and Abuse Support Toolkit: [Toolkit](#)

Energy UK. 2022. Vulnerability Good Practice Guide:

<https://www.energy-uk.org.uk/news/vulnerability-commitment-good-practice-guide-published/>

Equality Commission for Northern Ireland. Undated. Every Customer Counts.

<https://www.equalityni.org/Employers-Service-Providers/Disability-GFS/Commitment-charter>

Financial Conduct Authority. 2021. Guidance for firms on the fair treatment of vulnerable customers:

<https://www.fca.org.uk/publication/finalised-guidance/fg21-1.pdf>

Full Report: We are on a Journey – Implementing Trauma Informed Approaches in Northern Ireland: safeguardingni.org

Inclusive Customer Service Policy: niassembly.gov.uk

Joseph Rowntree Foundation. 2011. Forced Labour in Northern Ireland:

<https://www.jrf.org.uk/work/forced-labour-in-northern-ireland>

Key partners and partner rotation: icaew.com

Local Resilience Forum Gloucestershire. 2015. Vulnerable People Plan:

https://www.gloshospitals.nhs.uk/media/documents/Vulnerable_People_Plan.pdf

Office for Communications. 2022. Treating Vulnerable Customers Fairly: https://www.ofcom.org.uk/__data/assets/pdf_file/0024/244473/2022-treating-vulnerable-customers-fairly.pdf

Simon Community NI/ University of Ulster. Undated. Hidden Homelessness. https://simoncommunity.org/assets/pdfs/Hidden-Homelessness-ExecutiveSummary_FINAL.pdf

UK Regulators Network. 2020. Vulnerable Consumer Guide: <https://ukrn.org.uk/app/uploads/2020/09/UKRN-Vulnerable-Consumers-Guide.pdf>

University of Bristol/ Money Advice Trust. 2016. Vulnerability: A Guide for Advice Agencies: <https://malg.org.uk/wp-content/uploads/2017/03/Vulnerability-Guide-for-Advisers.pdf>