

If they don't tell us: Identifying Vulnerability in the Real World

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The Why

The importance of recognising customer needs and acting on them



But what does good support actually look like?

**Disclosure Has
Limits**

**Vulnerability Can Show
Up Later**

Success means:

- ❖ Earlier identification,
- ❖ Clearer support offers,
- ❖ Fewer handoff gaps,
- ❖ Less repetition for customers,
- ❖ Better outcomes overall.

**Shared Responsibility,
Done Safely**

Disclosure has Limits

Why Customers Do Not Always Reveal Vulnerability

Vulnerability Is Not Always Obvious

Many customers see their situation as normal, temporary, or not worth raising.

Fear, Stigma, and Consequences

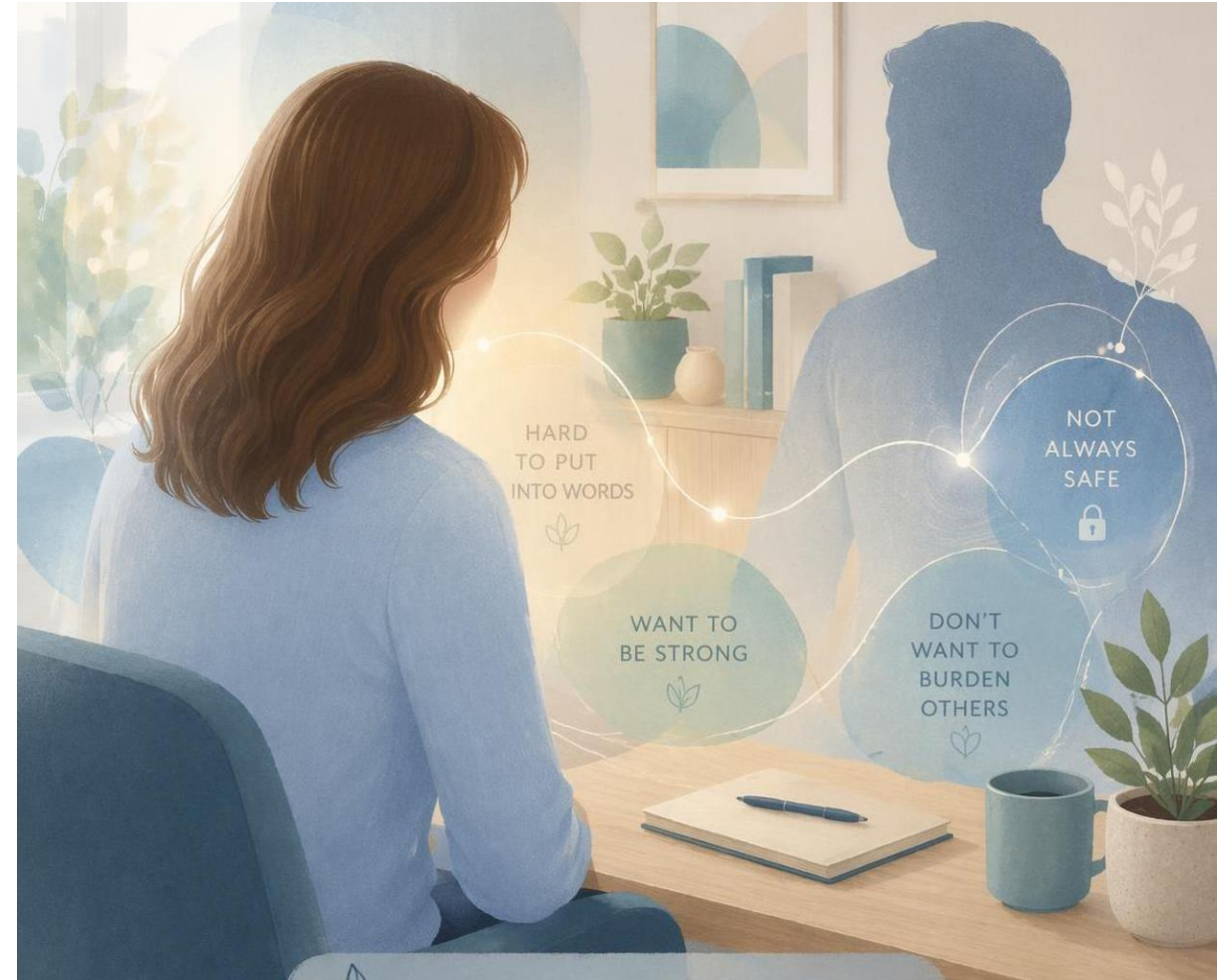
Customers may fear judgement, delay, or worse outcomes, so they stay silent unless support is explained clearly and early.

Timing Matters

Needs can emerge gradually or suddenly, so a one-off assessment will often miss them.

Use More Than Disclosure

Firms need practical ways to spot need, explain available support, and reuse relevant information safely with the right GDPR controls.



The Risks of Relying on Disclosure Alone

Vulnerable Customers Stay Hidden

If firms wait to be told, many customers in need will never be identified or supported consistently.

The Burden Falls on the Customer

Expecting customers to spot, explain, and repeat sensitive needs is unrealistic, especially in stress and intermediated journeys.

It Creates False Comfort

Low disclosure can look like low risk, masking handoff gaps, fragmented records, and missed opportunities to act early.

Build Integrated Identification

Good practice blends disclosure, observed indicators, and professional judgement, then shares relevant information once and safely with clear GDPR safeguards.



Intermediated Journeys: Visibility Gaps

Broker-Led Onboarding Delays Early Insight

Little Direct Contact

Broker-led onboarding limits early firm-customer contact, reducing insight at the point of entry.

Patchy Customer Insight

Information passed on by brokers can be incomplete, missing cues that help identify vulnerability early.

Later Touchpoints Matter

Once contact becomes direct, firms should explain available support early and act on what they learn.

Build for the Real Journey

Strong journeys capture information once, reuse it with control, and protect it with the right GDPR safeguards.



Clear Roles in Intermediated Journeys

Role of Brokers

Brokers often spot need first, so they should explain support early and escalate concerns quickly.

Shared responsibility

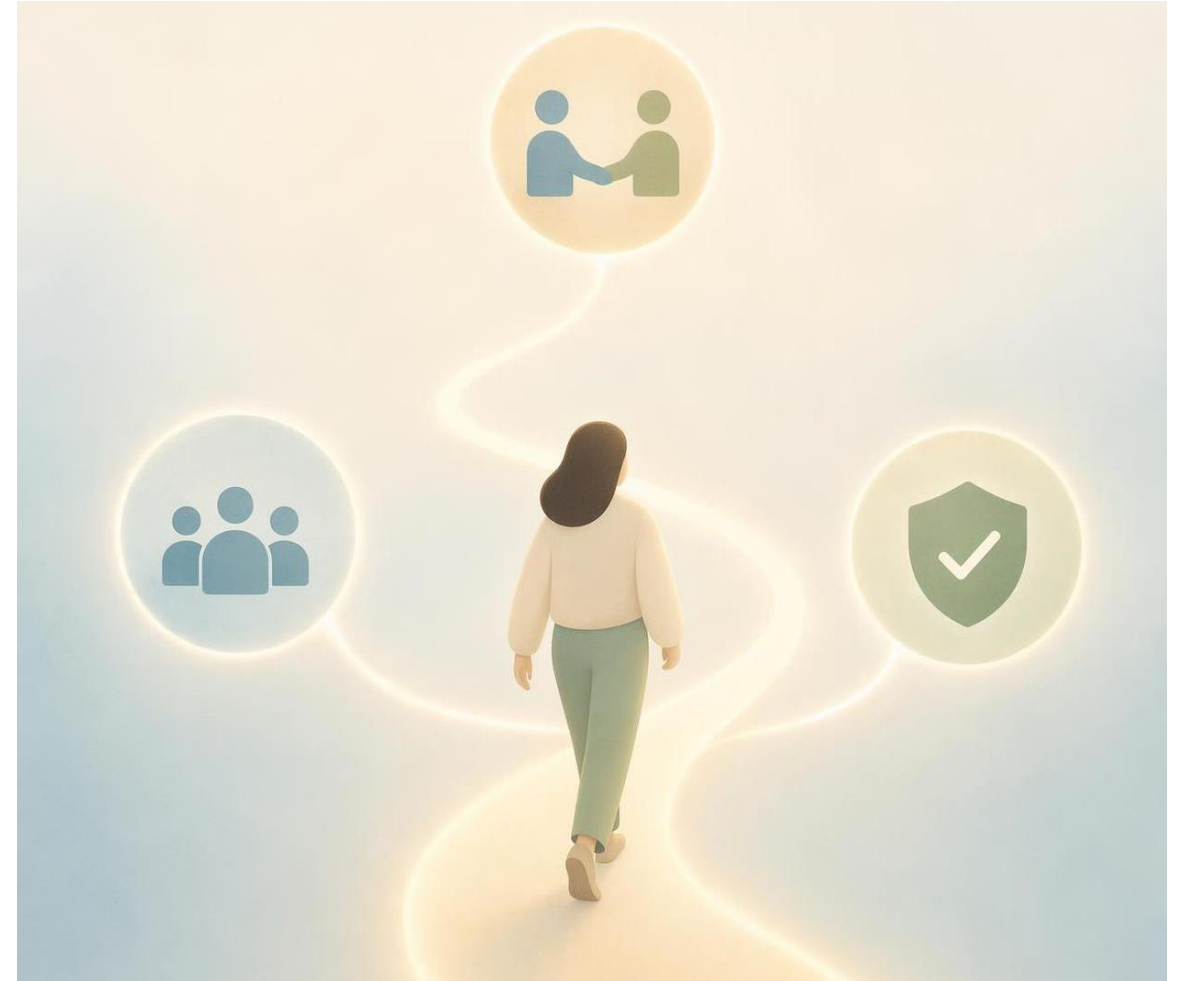
Collections, complaints, analytics and service teams all contribute; identification cannot sit with one team.

Tell us once care

Customers should not have to repeat sensitive details; carrying information forward reduces friction and builds trust.

Controlled sharing

Relevant information should be captured once, reused purposefully and shared with the right safeguards.



Spotting Signs Across the Journey



Behaviour & Conversations

Pattern changes
Emotional cues
Unsaid signals
Escalate early



Data & Key Moments

Arrears and complaints
Use trigger moments
Blend data + judgement
Share safely

Collaboration That Drives Better Support

Working Together for Faster Identification and Better Support

Turning Shared Signals into Shared Action

Joined-Up Teams

Frontline, data, and leadership teams need one practical approach to spot vulnerability early and explain support clearly.

Stronger Firm-Broker Links

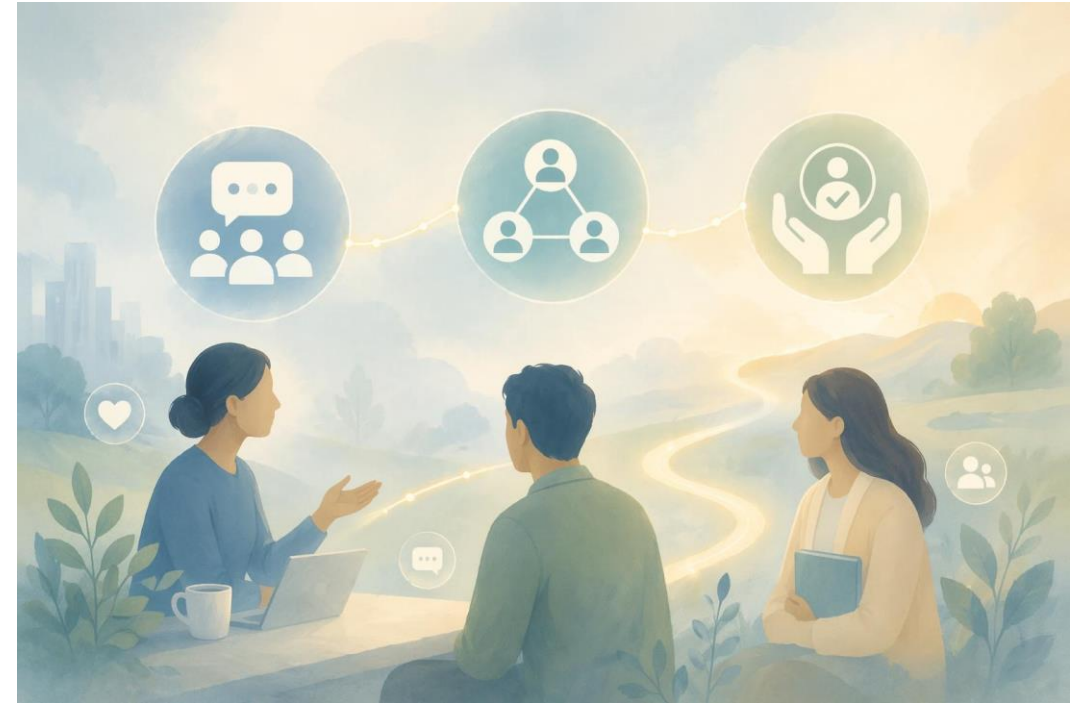
Shared definitions and feedback loops help firms and brokers capture key information once and reduce handoff gaps.

Break the Silos

A “Tell us once” culture cuts repetition and inconsistency while keeping sharing purposeful, controlled, and GDPR-safe.

Better Outcomes

When support is explained early and information is reused safely, customers face fewer gaps, less repetition, and more consistent treatment.



Three Priorities for Vulnerability Support

Early, connected vulnerability support leads to better outcomes for customers and firms alike. Customers should not have to keep proving their needs alone as they move across teams, channels, and intermediaries.

Spot Hidden Vulnerability Early

Priority: Make support visible early and do not wait to be asked. Customers rarely volunteer vulnerability, especially in intermediated journeys.

Use Clear Signals, Not Assumptions

Priority: Combine behaviour, conversations, and data with awareness, empathy, and practical action to identify need with confidence.

Make Tell Us Once Support Real

Priority: Capture information once, reuse it appropriately, reduce handoff gaps, and protect sharing with the right GDPR safeguards.



Remember – Vulnerability is a human concern, not just a regulatory one.

