

## Clifford Osborne Vulnerable Persons Policy

All clients will be assessed, as a minimum, against the following criteria. This is in addition to any processes we have in place for different vulnerability groups.

O U R  C L I E N T S  B E S T  I N T E R E S T S	Assess the client against our vulnerability policy
	Actively seek to encourage disclosure about potential vulnerability
	Ensure the approach taken is accurately reflected in the business records
	Consider whether to discuss the approach with colleagues/other professionals
	Ensure the know your client information gathers sufficient details to support the advice and uses additional questioning where appropriate
	Consider any unusual aspects – e.g. if someone else is accompanying a client, is there the potential for undue influence from that person
	Understand who the client is and the extent of the instructions needed to act on e.g. Power of Attorney
	Consider whether the client is acting differently/showing signs of a change of character
	Set a list of questions to check client memory recollection, where appropriate
	When working with more than one person, is there the potential for any conflict of interest or undue influence
	Confirm any change in circumstances which might lead to vulnerability e.g. taking on caring responsibilities
	Establish whether the client's stated needs and objectives align with their current circumstances
	Consider whether the standard sales process or specific vulnerability group process is appropriate to the client's needs
	Identify products/solutions that are clear and easy to understand for those showing signs of vulnerability
	Consider whether there is a need to adjust the delivery and format of communications e.g. providing a report in large print
	Explain all matters with no or limited use of jargon
	Try to accommodate flexibility around appointment locations and times e.g. visiting the client at their home at their preferred time of the day
	Try to determine if the duration of the meeting will need extending to accommodate more detailed explanations and delivery of information
	Determine if the complexity of the advice will require delivery over a greater number of meetings
	Considered the accessibility of office visits for those with health conditions/disabilities