Supporting Vulnerable Customers

FCA Best-Practice Checklist for UK Financial Services

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Why this checklist?

Financial services firms regulated by the UK Financial Conduct Authority (FCA) are expected to treat customers in vulnerable circumstances fairly and to design products and services that avoid harm.

The FCA's latest review of how firms support vulnerable customers highlights what it considers good practice.

This checklist distils those findings into a practical tool you can use to benchmark your own approach.

Why focus on vulnerability?

✔ **Prevalence:** The FCA's consumer research found that many customers with characteristics of vulnerability are reluctant to tell their provider about their situation – only about four in ten such consumers disclose their circumstances and just 19 % feel encouraged to do so. Firms that fail to identify vulnerability risk delivering poor outcomes and breaching the Consumer Duty.

✔ **Regulatory expectation:** Under the Consumer Duty, firms must act in good faith, avoid foreseeable harm and enable customers to pursue their financial objectives. The Duty requires firms to tailor products and services to meet the needs of vulnerable customers and to monitor outcomes continuously.

Use the self-assessment below to see whether your organisation is on track and to spotlight areas needing improvement.

Check the box to indicate 'yes'

1. Governance & outcomes monitoring

- [ ] Do you have a clear definition of what makes a customer vulnerable and what a good outcome looks like for each product/service?
- [ ] Do you regularly monitor and review outcomes, identifying where vulnerable customers receive worse outcomes than others?
- [ ] Do you collect and use reliable MI/data to evidence outcomes for vulnerable customers?
- [ ] Do you have escalation processes when poor outcomes are identified, and do you act to improve them?
- [ ] Are senior leaders actively engaged in reviewing MI, governance arrangements, and accountable for delivering outcomes?
- [ ] If outsourcing, do you monitor and ensure third parties treat vulnerable customers fairly?

2. Identification & disclosure

- [ ] Do you use centralised systems to store vulnerability data so customers don't need to repeat sensitive information?
- [ ] Are you using AI or technology to help identify potential vulnerability characteristics?
- [ ] Do you encourage customers to disclose their needs proactively?
- [ ] Do frontline staff consistently check and update customer vulnerability information?
- [ ] Do you ensure vulnerability data is handled securely, with restricted access and GDPR compliance?

3. Staff skills & capaibility

- [ ] Do frontline teams have access to internal guidance and process manuals on supporting vulnerable customers?
- [ ] Do you share third-party resources (e.g. charities, trade bodies) with staff and customers?
- [ ] Do you adjust performance targets (e.g. call times) for staff dealing with vulnerable customers?
- [ ] Do you protect staff wellbeing, allowing them to step away after distressing calls?
- [ ] Do you have specialist support teams for complex cases, and clear referral processes?
- [ ] Do you empower frontline staff to tailor responses flexibly to customer needs?

4.Tailored customer support

- [ ] Do you adapt standardised processes where needed to deliver good outcomes?
- [ ] Do you have forums or governance structures to develop bespoke solutions for challenging cases?
- [ ] Do you make customers aware of available support (e.g. third-party representation, debt charities)?
- [ ] Do you proactively reach out to customers to offer support?

5. Consumer understanding

- [ ] Are all communications written in plain English, with jargon
- [ ] Do you apply readability and clarity checks to written materials?
- [ ] Do you give customers (especially vulnerable ones) sufficient time to consider important decisions?
- [ ] Do you tailor communications by channel, format, or language to meet customer needs?
- [ ] Do you test communications (consumer testing/third-party reviews) before launch?
- [ ] Do you periodically review and adjust communications to ensure they're still effective?

6. Products & services

- [ ] Do your products/services meet the needs, characteristics, and objectives of vulnerable customers in your target market?
- [ ] Have you tested for foreseeable harm or disproportionate negative impact on vulnerable groups?
- [ ] Do you engage with external experts (e.g. charities) when designing or reviewing products?
- [ ] Do you embed inclusive design principles into your product/service development process?
- [ ] Do you provide vulnerability training for non-frontline staff (e.g. product teams, designers)?
- [ ] Do you test products with vulnerable customers before launch?

Self-check scoring

Tally up your score by totalling all your checked 'yes' boxes

28 – 33

Vulnerability champion
You're leading the way in protecting vulnerable customers. Your governance, monitoring, and support processes are strong - keep testing and refining to stay ahead of FCA expectations.

22 – 27

Strong foundation
You have a solid approach, but there are some gaps. Focus on strengthening escalation processes, staff capability, and consumer understanding.

15 – 21

Need attention
Your current processes could leave vulnerable customers at risk of poor outcomes. Prioritise improvements in monitoring, communications testing, and tailoring support.

0 – 14

High risk
Urgent action is required. Vulnerable customers are unlikely to be receiving consistently good outcomes, and you may struggle to evidence compliance with Consumer Duty.

Pro tip: If your score isn't where you want it to be, start with small changes that have a big impact :

- Empower staff with vulnerability training and clear escalation routes.
- Use technology (including AI) to spot signs of vulnerability earlier.
- Test your customer communications to ensure they're accessible and effective.

Ready to take the next step & strengthen your vulnerable customer strategy?

You've just audited your approach to **supporting vulnerable customers**. Whether you scored high or spotted a few gaps, now's the moment to get peace of mind before the next FCA review.

Here's how Voyc can help meet FCA expectations:

Catch signs of vulnerability early
100% of customer conversations monitored with AI, so no signals are missed.

Act faster to protect customers
Alerts monitor for vulnerability indicators so you can act faster.

Stay ready for audits
Access instant MI, QA insights, and trend reports across all teams to evidence outcomes.

One customer achieved the following with Voyc:

96%	4,767	£23,000
vulnerability detection	vulnerability cases identified in 6-months	annual potential regulatory redress savings

See Voyc in action

Discover how top financial services firms are reducing compliance risk, cutting costs, and improving customer outcomes, all without growing headcount.

Book your free personalised demo

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