



Financial Services companies urgently need to talk to their most vulnerable customers. But often those customers don't trust them enough to respond. How can you fix a broken dialogue?

The Financial Conduct Authority has just published its finalised guidance on the fair treatment of customers in vulnerable situations. Years in the making, it couldn't be more timely given the economic impact of the pandemic.

It's time for less talk and more action. Soon enough, the FCA will want to hear what Financial Services firms have done, and what improvements they can show to customer outcomes.

But the guidelines don't tell businesses precisely what to do. How could they? The FCA regulates 60,000 firms. And there's no simple formula or algorithm for meeting the challenge. The guidance even says that it 'does not provide a checklist'.

But there's one thing the FCA is crystal clear about: it expects every firm to understand its own customers like never before. Here's where our user-centric tools can help.

Designing iteratively with inclusion in mind will help you meet the widest set of needs with the simplest solution, minimising the number of customers whose needs aren't met by your core journeys. To steer the rest towards a more appropriate, adapted service, you'll need to identify them.



## Do they trust you?

An effective identification strategy will require both data analysis and self-disclosure by customers. But people in vulnerable situations often mistrust requests for information - they feel it will be used against them.

#### So how do you establish trust in this crucial interaction?

One important element is a set of questions that customers ask themselves when they receive any request for information:

- Who is asking me?
- What are they asking me for?
- Why are they asking me?
- Why are they asking me now?

Gaining a customer's trust requires organisations to answer these questions clearly and convincingly.



### 'They just pound you'

We're using these questions to design a service that helps people find their way out of debt, using early, sensitive interventions.

Last week, we interviewed one man who receives multiple texts every week from debt collection agencies. It's been that way for years.

'They just pound you, don't they?' he said. 'I don't know how they get my number. They offer to reduce payments but I can't afford them. I just ignore them.'

Yet the FCA expects financial services firms to enter into a dialogue with people just like this - and to show a positive outcome.

In our prototype, the man's bank invited him to disclose information about his situation – not just his debt, but things that might be affecting how he managed his finances.

Some people will run a mile at the very idea. And if you'd heard this man describe his life experience you might have expected him to be one of them. But it wasn't as straightforward as that.

# Rather than feeling 'pounded', he found the experience unexpectedly helpful.

Though he had expected to be pressured into an unrealistic commitment, he said the suggested monthly repayment felt transparent and personalised because it was based on accurate information from his bank account (using an Open Banking service). And it showed that it understood his world: 'you don't get paid regular each month'.

That income and expenditure assessment also gave him something unexpectedly valuable - a breakdown of his monthly spending, which he could use to think about how and where he spends his money.

It built trust. It made him think that the journey, and the bank, was on his side. 'If they've done that for me, they might be able to help with other debts.'

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# Getting personal

When the journey asked about physical or mental health issues, its relevance made sense to him. 'I get why they'd ask this – it's a good question. I have autism, and it used to really affect how I managed money. My stepson has ADHD and he has no concept of money at all.'

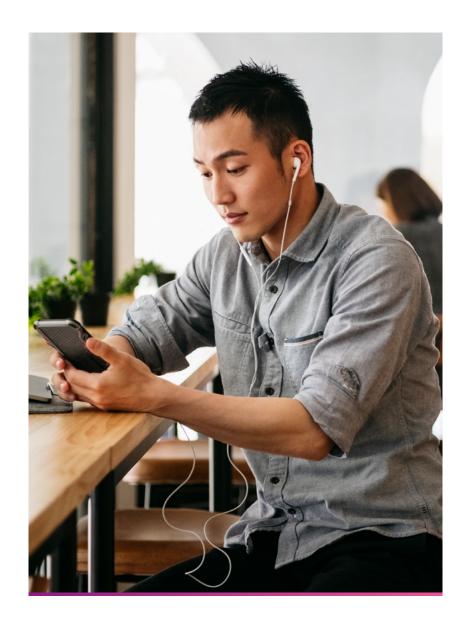
With trust, he went from ignoring messages to sharing sensitive information, and the relationship grew.

'My bank is trying to understand – that's good. It'd be wise to be honest. I'd say yes.'

All this by making sure our design answered the key questions:

- Who is asking me?
- What are they asking me for?
- Why are they asking me?
- Why are they asking me now?

So far so good. But getting it right isn't easy.



### It's not easy

The next question asked about his caring commitments – one of the vulnerability characteristics the FCA suggests firms might need to look for in their clients.

'I don't know why it's asking me that. Does it mean 'are you a carer?' I'm a carer for my stepson. But why does that make it harder to manage my finances?'

The way we'd phrased the question was a little unclear. It threw him. Sometimes that's all it takes.

- Who is asking me?
- What are they asking me for?
- Why are they asking me?
- Why are they asking me now?

This interview illustrates a point: getting people to trust you requires deep sensitivity to their needs.

We've designed services for cancer patients, people suffering financial shocks, survivors of domestic abuse, and people who have experienced a mental health crisis. Engaging with people in vulnerable circumstances often requires special skills. We've put in place multiple layers of processes and training to safeguard our staff, and the people they're talking to.

And when it comes to design, each context brings a specific set of challenges and sensitivities. Fortunately, our user-centric tools can help with yours.



