





**Vulnerable Person Checklists**

ICAS

Consultation

Response

March 2023

Vulnerable Person Checklists

This checklist is issued as part of the ICAS ‘Dealing with vulnerable persons toolkit and guidance’.

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| **Individual details** |
| Name of vulnerable individual | Click or tap here to enter text. |
| Brief outline of circumstances | Click or tap here to enter text. |
| Checklist completed by | Click or tap here to enter text. |

Checklist A: Identifying vulnerable individuals – red flags

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| **No** | **Red flags** | **Answer** | **Comments** |
| 1 | Individual factors – are there any passing mentions of illness, disability or impairment; reference to contact with the health sector or social care sector; reference to the receipt of specific benefits etc? | Choose an item. | Click or tap here to enter text. |
| 2 | Behavioural cues – is the individual flustered, anxious, confused or asking unrelated questions? | Choose an item. | Click or tap here to enter text. |
| 3 | Wider circumstances – has there been excessive or unusual expenditure, life events (such as time in hospital, imprisonment, bereavement, income shocks)? | Choose an item. | Click or tap here to enter text. |
| 4 | Organisational actions – has there been a reference by the individual to things that have or haven’t been done that have caused difficulty? | Choose an item. | Click or tap here to enter text. |

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Checklist B: Supporting individuals with mental capacity limitations – ‘BRUCE’ protocol

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| **No** | **Action** | **Answer** | **Comments** |
| 1 | **B - Behaviour and talk**Are there any indicators of a limitation in the individual’s behaviour and speech? | Choose an item. | Click or tap here to enter text. |
| 2 | **R – Remembering**Is the individual experiencing problems with their memory or recall? | Choose an item. | Click or tap here to enter text. |
| 3 | **U – Understanding**Does the individual understand the information they are being given? | Choose an item. | Click or tap here to enter text. |
| 4 | **C – Communicating**Can the individual communicate their thoughts, questions, and ultimately a decision about what they want to do? | Choose an item. | Click or tap here to enter text. |
| 5 | **E – Evaluating**Can the individual ‘weigh-up’ the different options open to them? | Choose an item. | Click or tap here to enter text. |

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Checklist C: Handling disclosures of vulnerability – ‘TEXAS’

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| **No** | **Action** | **Completed?** | **Comments** |
| 1 | **T - Thank the individual.**(What the individual has told you could be useful for everyone involved)*“Thanks for telling me about your situation, as it will help us take this into account”* | Choose an item. | Click or tap here to enter text. |
| 2 | **E - Explain how the information will be used**(This step will assist the firm to meet its data protection obligations):*“Let me explain how we’d like to use that information, just so you know”* This explanation should include why the information is being collected, how it will be used to help decision-making, and who the data will be shared with / disclosed to. | Choose an item. | Click or tap here to enter text. |
| 3 | **X - eXplicit consent should be obtained**(This step will assist the firm to meet its data protection obligations)*“Are you happy to give me permission to note down and save the information you’ve shared with me today?”* | Choose an item. | Click or tap here to enter text. |
| 4 | **A - Ask the individual questions to get key information**(these will help you understand the situation better):Examples:* “*How does your situation make it difficult to manage your finances?”*
* *“How does your situation affect your ability to communicate with us?”*
* *“Does anyone help you manage your finances, such as a carer, relative, or other third party?”*
 | Choose an item. | Click or tap here to enter text. |
| 5 | **S - Signpost or refer to internal and external help (where this is appropriate):** At this point, staff and firms might:* need to internally refer the individual to a specialist team/staff member in their firm.
* want to consider external signposting to an organisation.
 | Choose an item. | Click or tap here to enter text. |

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Checklist D: Gaining more information about circumstances – ‘IDEA’

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| **No** | **Action** | **Completed?** | **Comments** |
| 1 | **I – Impact**When speaking to an individual, staff should ask them what the vulnerable situation either stops the individual from doing in terms of their financial situation, or what it makes harder for them to do.Equally, for written correspondence, staff could ask themselves what they can learn from any letter or email about how the individual’s vulnerable situation is affecting their finances.This will help provide valuable insight into both the severity of the condition and its consequences. For example “*What has the impact been on your personal and financial situation?”* | Choose an item. | Click or tap here to enter text. |
| 2 | **D – Duration**Staff should discuss how long the individual has been living with the reported vulnerability, as the duration of different situations or conditions will vary. This is often clear or implied in written correspondence too. This can inform decisions about the amount of time an individual may need to consider certain options or take positive steps to improve their financial situation.For example, “*So when did this first start to happen?”* | Choose an item. | Click or tap here to enter text. |
| 3 | **E – Experiences**Some people may have more than one experience or episode of their vulnerable situation, whilst others may just have one. Staff will need to take such fluctuating situations into account (including the effects of any medication) and consider how the person’s situation or condition is likely to impact them now and in the future. This will involve considering both what support the individual needs in relation to their vulnerability, and how this relates to addressing the individual’s financial situation.For example, “*To help me understand your situation better, can you tell me whether this has happened before?”, “How has it been?”* | Choose an item. | Click or tap here to enter text. |
| 4 | **A – Assistance**Staff should consider whether the individual has been able to get any care, help, support or treatment for their condition or situation. This could open up discussions about obtaining relevant medical evidence whilst on the telephone.Equally, in written communications, a response can be formulated that is supportive in terms of options available to the individual for further support regarding their wider vulnerable situation.* For example “Is there anything else we should know about the treatment or care you’re receiving? It could help us to support you better in the future.”
 | Choose an item. | Click or tap here to enter text. |

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Checklist E: Handling Disclosures from carers – ‘CARERS’

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| **No** | **Action** | **Completed?** | **Comments** |
| 1 | **C - Check for authority**If the carer or third party has evidence of their authority to act on the individual’s behalf, a more detailed discussion can be arranged (once evidence has been supplied).If the carer cannot supply this evidence, or needs to share information about the individual now, follow steps A to S. | Choose an item. | Click or tap here to enter text. |
| 2 | **A - Avoid discussing any account details**, making sure to explain to the carer why this isn’t possible. | Choose an item. | Click or tap here to enter text. |
| 3 | **R - Reassure the carer** that their concerns can still, however, be recorded as observations (unverified) on the individual’s account and can be looked into. | Choose an item. | Click or tap here to enter text. |
| 4 | **E - Explain to the carer their observations will need to be shared** with the individual, colleagues and potentially any individuals (carers will need to give their consent for this). | Choose an item. | Click or tap here to enter text. |
| 5 | **R - Record the carer’s observations**, listening carefully, and ensuring:* You have checked why the individual is unable to speak directly with the firm about these issues (e.g. is there a communication issue?).
* You are clear how the individual’s vulnerable situation affects their ability to repay.
* You have confirmed with the carer what information has been recorded, and how long these unverified observations will be held on file while they are being checked.
 | Choose an item. | Click or tap here to enter text. |
| 6 | **S - Summarise the next steps**, which might include:* You (or a colleague) speaking with the individual concerned to establish if there is a problem, including checking the unverified observations made by the carer.
* The carer discussing with the individual a potential mandate to act on their behalf.
* The carer and individual working together to collect supporting medical evidence.
 | Choose an item. | Click or tap here to enter text. |

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Checklist F: The ‘BLAKE’ protocol

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| **No** | **Action** | **Completed?** | **Comments** |
| 1 | **B - Breathe** (to focus)It can be scary to hear something like this, so take a moment to simply breathe and focus your thoughts. You can do this by acknowledging what the individual has said:*“I’m so sorry to hear you feel that way. How can we help?”* | Choose an item. | Click or tap here to enter text. |
| 2 | **L - Listen** (to understand)We always take what the individual has shared seriously, but we also always listen carefully so we can assess the imminent risk of harm.Listen to the individual using verbal nods and recapping key information to show your understanding. | Choose an item. | Click or tap here to enter text. |
| 3 | **A - Ask** (to discover)Listening is important, but where gaps continue to exist in your understanding about the current situation, you should ask questions to fill these.Example questions are included below – staff should aim to put these into their own words and avoid using them as a script. | Choose an item. | Click or tap here to enter text. |
| 4 | **K - Keep safe** (from harm)Based on your understanding of the situation, and also your firm’s policy, the emergency services should be contacted if the individual is at imminent risk of harm. During this, you may need to stay on the line to keep talking with the individual. Reassure the individual that your primary concern is their safety, and that any financial difficulty can be dealt with later.*“I’m worried about what you’ve told me – what can we do to keep you safe?”* | Choose an item. | Click or tap here to enter text. |
| 5 | **E - End** (with summary)Once individual safety has been addressed, if it is possible to do so, staff should summarise what has been discussed and agreed, so that the call can end (and any data-recording can begin).*“We’ve been talking for a while, but before we finish let me summarise what we agreed and what will happen next…”* | Choose an item. | Click or tap here to enter text. |

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Checklist G: Firm best practice checklist for signposting vulnerable individuals

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| No | Action | Answer | Comments |
| 1 | Referral procedure in place for staff to follow. | Choose an item. | Click or tap here to enter text. |
| 2 | Staff are confident in acknowledging where the individual’s situation falls outside of the scope and expertise of their firm. | Choose an item. | Click or tap here to enter text. |
| 3 | Staff have up to date information regarding the referral partner. | Choose an item. | Click or tap here to enter text. |
| 4 | Staff are able to explain what support the firm can provide and what the potential benefits for the individual are relating to their specific needs. | Choose an item. | Click or tap here to enter text. |

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