

West Buckland Bloodstock Vulnerable Customers Policy

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1 Purpose

This policy details how West Buckland Bloodstock (the Firm) will identify and manage vulnerable customers or persons and ensure a consistency of approach within the Firm.

West Buckland Bloodstock Ltd sells plant machinery, haulage and vehicles (typically Land Rovers) to all individuals based in the UK who are working within the agriculture and farming industry. Upon authorisation, we will offer credit broking services to these clients. We will source suitable finance products through *We would expect to see the following specific vulnerabilities for our regulated target market:*

- *Physical disability or impairment (if not defined as a disability under the Equality Act 2010)*
- *Mental health problems*
- *Change in circumstances (e.g. bereavement, divorce)*

Should we identify a vulnerable person, staff will raise this with our management team in line with this policy.

We can provide simple ideas and “point them in the right direction”, such as organisations in our Appendix below, if we recognise the person who has made the initial contact shows signs of vulnerability.

According to the FCA’s definition, a vulnerable customer is someone who due to their personal circumstances is especially susceptible to harm, particularly when a firm is not acting with appropriate levels of care. It applies to the supply of products or services to retail customers who are natural persons¹, even if a firm does not have a direct client relationship with the customer.

West Buckland Bloodstock embeds the fair treatment of vulnerable customers as part of our compliance culture throughout the firm, not just on the frontline but also in areas such as product development. Our management body is committed to create and maintain a culture that enables and supports staff to take responsibility for reducing the potential for harm to vulnerable customers.

This policy has been written following the guidance provided by the FCA in its “Finalised Guidance 21/1 (FG21/1) – Guidance for firms on the fair treatment of vulnerable customers” released in February 2021 and considering the requirements established in the FCA’s Principles for Businesses (the Principles), the FCA’s six ‘fair treatment of customers’ (‘TCF’) outcomes² and the Financial Services Authority’s ‘Treating Customers Fairly – guide to management information’³.

2 Review of Policy

This policy will be reviewed regularly, at least once a year, and amended as considered necessary by our sole director in the event of changing circumstances or regulations.

¹ ‘Natural persons’ includes individuals but may also include some businesses or charities which are not incorporated. For example, individuals or groups of individuals who are un-incorporated business customers – e.g. sole traders and some partnerships.

² <https://www.fca.org.uk/firms/fair-treatment-customers>

³ <https://www.fca.org.uk/publication/archive/fca-tcf-mi-july2007.pdf>

3 Responsibilities

3.1 Management Body

Our director is required to ensure that all employees are aware of the firm's policy on identifying and dealing with customers who may be vulnerable, be it on a temporary or a permanent basis. West Buckland Bloodstock will provide training and support to assist employees in handling vulnerable customers.

Our culture is transparent and open; we actively encourage our staff to talk about any issues that they are experiencing. Management has regular "catch-ups" with staff members to ensure there are no underlying concerns when the staff member have been dealing with a vulnerable situation during their work.

All staff members will have a monthly one to one which typically lasts an hour or however long it takes and covers off absolutely anything including every transaction that will cover off vulnerable customers and how the member of staff have been handling that client and the effects on themselves personally.

In addition, there is an open-door policy and all staff know they can access our management team at any time.

If any of the staff required additional support including external counselling, this is provided to, at the firms cost.

West Buckland Bloodstock process regarding dealing with Vulnerable Customers are reviewed quarterly.

Management Meetings cover off a full 360 review of the business which includes all of our processes and regulatory governance of which this Vulnerable Persons Policy is covered off.

All staff have ample opportunities if they feel improvements can be made and these are noted and implemented within reasonable timescales.

3.2 Employee Responsibilities

Within 5 working days of joining the firm, employees will complete a Vulnerable Persons training session online to make themselves aware of our firm's approach to identifying and dealing with customers who may be vulnerable. Training is provided through our compliance consultants, Cosegic Limited.

They are also required to read this policy to ensure they are aware of our internal procedures for dealing with vulnerable persons.

Where a customer has been identified as vulnerable, the employee will ensure that they follow the requirements set out in this policy and manage the customer relationship accordingly.

4 Vulnerable Customers

The FCA's definition of vulnerability refers to customers who, due to their personal circumstances, are especially susceptible to harm, particularly when a firm is not acting with appropriate levels of care. Firms should think about vulnerability as a spectrum of risk. All customers, who are 'natural persons' are at risk of becoming vulnerable and this risk is increased by characteristics of vulnerability related to four key drivers:

- Health – health conditions or illnesses that affect ability to carry out day-to-day tasks

- Life events – life events such as bereavement, job loss or relationships breakdown
- Resilience – low ability to withstand financial or emotional shocks
- Capability – low knowledge of financial matters or low confidence in managing money (financial capability). Low capability in other relevant areas such as literacy or digital skills.

West Buckland Bloodstock understands that vulnerability can be difficult to identify and that not all customers can be managed in the same way. We have taken into account guidance provided by the FCA and have put in place internal controls and processes to ensure the fair treatment of its customers and to ensure that vulnerable customers in particular are identified and supported.

Not all customers with characteristics of vulnerability will be vulnerable, but they may be more likely to have additional or different needs which, if not met, could limit their ability to make decisions or to represent their own interests.

Customers may not want the label ‘vulnerable’ applied to them. While we refer to customers as being vulnerable throughout this policy, West Buckland Bloodstock, as suggested by the FCA, does not use this label in its interactions with customers. Instead, we focus on what harm or disadvantage customers may be vulnerable to and how it can respond appropriately.

5 Types of Vulnerability

Now Appliance Rental offers customers plant machinery and vehicles to UK based small to medium sized enterprises within the UK. Our main focus is the agriculture and construction industry.

We appreciate vulnerability can come in a range of guises, and can be temporary, sporadic or permanent in nature. It is a fluid state that needs a flexible, tailored response from firms.

- Many people in vulnerable situations would not diagnose themselves as ‘vulnerable’
- West Buckland Bloodstock recognises that everyone is at risk of becoming vulnerable at some point in their lives
- To enable us to identify potential vulnerability and prioritise our efforts, we assess the type of vulnerability being presented and work to provide appropriate solutions. Employees will work with our management team to identify the client vulnerability and assess the most appropriate way forward for the client, taking account their individual vulnerability.

5.1 Examples of Vulnerability Characteristics

West Buckland Bloodstock recognises that potential or actual vulnerability is not limited to just mental health or age-related limitations and as such, ensures that staff are aware of the wide-ranging characteristics that could indicate vulnerability in a customer. As detailed in Section 1, examples of these characteristics we may come across in are business are noted as being:

- Low literacy, numeracy and financial capability skills
- Physical disability or impairment (if not defined as a disability under the Equality Act 2010)
- Severe or long-term illness

- Mental health problems
- Low income and/or debt
- Caring responsibilities (including operating a power of attorney)
- Being 'older' for example over 80, although this is not absolute (may be associated with cognitive or dexterity impairment, sensory impairments such as hearing or sight, onset of ill-health, not being comfortable with new technology)
- Being young (associated with less experience)
- Change in circumstances (e.g. job loss, bereavement, divorce)
- Lack of English language skills
- Non-standard requirements or credit history (e.g. armed forces personnel returning from abroad, ex-offenders; care-home leavers, recent immigrants)

West Buckland Bloodstock will take account of an individual's characteristics and assess whether our products and or services are presented in a way that meets the specific needs of that customer.

5.2 Examples of Vulnerability Triggers

Vulnerability is not limited to a person's characteristics. This is because it could be their circumstances or a situation that is making them vulnerable, rather than any mental or physical condition. West Buckland Bloodstock is aware that the following examples of circumstantial triggers can lead to temporary or permanent vulnerability:

5.2.1 Impact of Change in Circumstances

A change in personal circumstances can cause a consumer to fall into a vulnerable situation – all the more so if the consumer already has one or more risk characteristics.

People are particularly at risk in their interaction with financial services when they experience a change in circumstances that often leads to a financial shock. Examples of a change in circumstances can include:

- A change of job leading to different working patterns, making communication more difficult
- A change in relationship status
- An unwell child or other relative
- Moving house
- Retirement (leading to change in daily patterns and routines)

5.2.2 Impact of Change in Income

A financial shock could be an unexpected large expense or a loss of income. A drop in income, or income volatility, can cause particular problems due to the ongoing commitment presented by many financial products. A reduction in ability to meet these financial commitments can cause both immediate and longer-term problems.

- Zero hours contracts (leading to fluctuating income)
- Redundancy

- Retirement (leading to drop in income)
- Statutory sick pay
- Maternity/Paternity/Parental leave (note, this can affect the partner as well as the person taking leave)

In these conditions, the impact of a problem or difficult interaction can be magnified, and vulnerability to unscrupulous practices is increased, creating a vicious circle. The individual's practical ability to seek redress may also be diminished.

5.3 Signs of Vulnerability

West Buckland Bloodstock's staff are reminded to be on the lookout for the following signs that may be indicative of vulnerability:

- *Repeated requests for actions already carried out or responses already given*
- *Frequently asking staff to repeat themselves*

Other triggers that may occur during interaction with the client that could indicate a vulnerability issue include phrases such as:

- *'I can't pay'*
- *'I can't read my invoice'*
- *'I can't understand the letter you sent me'*
- *'I can't hear you very well'*
- *'I can't hold on all day'*
- *'My son/daughter/wife/husband deals with these things for me'*

Staff are also reminded to be on the lookout for:

- *Shortness of breath or signs of agitation*
- *Asking for repetition (a sign that the customer is not retaining information or may have difficulty hearing)*
- *Signs that the consumer has not understood or signs of confusion*
- *Mention of medication*
- *Asks repeated unrelated questions*
- *They keep repeating themselves*
- *They say 'Yes' in a manner that suggests they did not listen to or understand the question*

5.4 Examples of harm and disadvantage that the Firm should be alert to

The FCA has explored some of the behavioural and personal consequences of vulnerability for consumers and shared this in its Occasional Paper 8 – Consumer Vulnerability⁴. These include:

- Heightened stress levels due to difficult, or different, personal circumstances

⁴ <https://www.fca.org.uk/publication/occasional-papers/occasional-paper-8.pdf>

- Increasing time pressures due to additional responsibilities
- Increasing pre-occupation ('brain is elsewhere') limiting their ability to manage
- Processing power and ability decreasing due to competing pressures, for example due to the side effects, or emotional toll, of receiving medical treatment
- Lack of perspective especially when experiencing something for the first time, not fully understanding the broader implications; being unable to make comparisons, or see the 'bigger picture'
- Changing attitudes towards taking risks; people often become more 'reckless' and/or careless when under stress

These consequences may affect the way vulnerable consumers engage with providers and may negatively impact their decision-making.

5.5 Summary

Vulnerability involves the interplay between individual circumstances, situations and market factors. These can include:

- A consumer's state of mind can have a major impact on behaviour and decisions
- A change in circumstances, and multi-layered risk factors, are particular flags for potential vulnerability
- The number of people involved is large and rising - prioritisation is vital to achieve a realistic approach

In order to address the needs of vulnerable customers correctly, it is important to be able to identify them. In many cases, more than one characteristic is present which increases the consumer's vulnerability.

West Buckland Bloodstock's staff need to be alert to the signs that the person they are dealing with may not have the capacity, at that moment in time, to make an informed decision about the implications of the arrangements that they are undertaking. This is managed by ensuring that staff are encouraged to listen, identify needs, and adjust their approach accordingly.

6 Dealing with Vulnerabilities

6.1 Policies and Procedures

West Buckland Bloodstock recognises that a good vulnerability strategy will benefit all customers and this policy informs the Firm's approach to dealing with potentially or actually vulnerable customers. Where it is necessary to interact with customers, procedures have taken into account how vulnerability can be identified and managed.

6.2 Products and Services

Where firms design products and services that do not anticipate or take into account the needs of vulnerable consumers in their target market and customer base, there is a risk that these consumers can suffer harm as their needs may not be met from the start. Products and services can have inherent features that could be harmful to some vulnerable consumers. Note that this applies to the supply of products or services to retail customers who are natural persons, even if the WEST BUCKLAND BLOODSTOCK does not have a direct client relationship with the customer.

West Buckland Bloodstock products and services have been designed in an inclusive way to respond better to the needs of those in vulnerable circumstances. An inclusive strategy has been embedded that aims to make services available, usable and accessible to all regardless of personal circumstances.

Communications have been designed in a manner that is clear, fair and not misleading and when informed of specific communication vulnerabilities (i.e. large print), we will make reasonable adjustments to ensure that those customers' needs can be managed.

At all times, West Buckland Bloodstock will ensure products are clearly explained and understood by the consumer. We will always work at the customers speed and allow them time to read through financial information. We will always allow them to take information away with them to consider their options and obtain further advice.

6.3 Customer Service Systems

In implementing systems, i.e. telephone systems, Client/Customer Relationship Management (CRM) systems etc., West Buckland Bloodstock has considered the potential impact on vulnerable customers.

Our systems are set up to be able staff to record vulnerability/ suspected vulnerability.

We capture information including all email correspondence and make comment of the potential/actual vulnerability of that client within their client record.

Although introductions will be received via our website or by email our staff will contact the client to discuss requirements and carry out a fact find.

Our fact find will include a review of affordability to establish the suitability of the loan requested.

Affordability checks involve income verification including a review of 3 months bank statements, last 2 years Tax Calculations, salary payments, proof of income, expenditure, existing commitments, credit file i.e. Experian Report.

Systems, particularly automation of systems (where a customer has no opportunity to speak to a real person) are recognised as making it difficult to realise that customers may be vulnerable.

West Buckland Bloodstock, appreciates lack of co-ordination between departments can lead to customers repeating themselves (this can be particularly distressing if someone is dealing with a bereavement). However, we ensure information is readily available to staff through our internal systems.

West Buckland Bloodstock's staff are aware of other signs of vulnerability and are aware of how to take the appropriate actions. We speak directly to all our customers through the application process.

Staff are trained in how to manage records, particularly sensitive personal information, in a manner that allows colleagues to understand the individual's vulnerability.

6.4 Communications

West Buckland Bloodstock appreciates failure to communicate with vulnerable customer in ways they can understand may result in an increased risk of harm. Customers may not be able to understand the information they are sent or may struggle to communicate their needs to the firm.

West Buckland Bloodstock will ensure communications throughout the life cycle of a product or service are clear and provided to vulnerable customers in a way that they can understand, this includes:

- Marketing
- Point of sale
- Post-contractual information
- Information about changes to the product or service
- Complaints processes

WEST BUCKLAND BLOODSTOCK will consider the needs of vulnerable customers in their target market and customer base when designing communications.

We will put this into practice as per the below:

- Colour schemes friendly to people with conditions such as dyslexia
- Large print
- Accessible website

6.5 Training

Staff, from senior management through to frontline and relevant back-office staff, can influence outcomes for vulnerable consumers. West Buckland Bloodstock will ensure that all relevant staff have the appropriate skills and capability, as well as support from appropriate systems and processes, to understand and take into account the needs of vulnerable consumers in their work.

All relevant staff should understand how their role can affect vulnerable consumers and the potential needs from their target market's vulnerabilities and what this may mean in practice for their role.

West Buckland Bloodstock will ensure that staff have the skills and capabilities to recognise vulnerability and respond appropriately to individual consumers' needs so they can treat them fairly. Our staff should be capable of recognising and responding to needs:

- Where the customer has told the firm about a need
- Where there are clear indicators of vulnerability or
- Where there is relevant information noted on the customer's file that indicates an additional need or vulnerability

Staff should take steps to encourage disclosure where they see clear indicators or vulnerability but are not expected to go further than this to proactively identify vulnerability.

West Buckland Bloodstock provides training to its staff on identifying and managing the relationships with vulnerable customers. All customer facing staff are expected to undertake refresher training at least annually.

Training is completed online, through our compliance consultant, Cosegic Ltd and consists of an online training and a short test where staff must obtain a minimum 80% pass mark.

7 Monitoring and evaluation

West Buckland Bloodstock should monitor the actions it is taking to ensure they treat vulnerable customers fairly and the outcomes vulnerable customers experience in comparison to other customers. We do this with reference to all of the aspects of our customer relationships and have regard to the treating customers fairly (TCF) outcomes or other outcomes the FCA has communicated are important to achieve for customers in our sector.

Monitoring in this way will allow West Buckland Bloodstock to determine whether we are achieving good outcomes for vulnerable customers and understand which activities and processes work well, and which ones need to be adapted to improve the outcomes for vulnerable consumers.

As part of our onboarding due diligence, West Buckland Bloodstock will review the lenders/brokers Vulnerable Persons policies. Any subsequent changes notified to us by the lender/broker will be immediately communicated to our staff.

7.1 Quality assurance

Lack of effective quality assurance on services and products along the customer journey may result in West Buckland Bloodstock failing to spot where the needs of vulnerable customers are not being met and what needs to be changed as a result.

West Buckland Bloodstock will implement quality assurance processes throughout the whole customer journey to highlight areas where:

- They do not fully understand vulnerable customers' needs
- The performance of staff has led to poor outcomes for vulnerable customers
- Products or services unintentionally cause harm to vulnerable customers
- Customer service processes are not meeting vulnerable customers' needs

West Buckland Bloodstock will consider the following aspects of the firm customer relationship in its monitoring of the quality of the processes associated with vulnerable customers:

- Decision making: are products / services meeting the needs of customers when providing information and support to make decisions? Note that this applies to the supply of products or services to retail customers who are natural persons, even if we do not have a direct client relationship with the customer.
- Engagement throughout the customer journey: are customer service and communications meeting the needs of vulnerable customers? Are customers experiencing difficulties effectively engaging with firms throughout the customer journey?
- Disclosing changes in circumstance / needs: are vulnerable customers supported and encouraged to share information about their circumstances or their needs?
- Suitable products: are customers able to access product features that are suitable and that meet their changing needs?

Some examples of how West Buckland Bloodstock can put this into practice are:

- Looking at complaints data (in tandem with ensuring it is easy for vulnerable consumers to make complaints, and that complaints can be made through multiple channels).
- Using feedback that may not be sent to the firm directly, including online reviews and social media complaints.
- Testing experiences of vulnerable customers through processes such as mystery shopping, auditing, focus groups and deep dives.
- Using insights from organisations with an understanding of the ‘lived experience’ of vulnerable consumers, such as consumer bodies, charities and other third sector organisations. This may include published insights.
- Allowing staff to feedback honestly when they think processes for vulnerable consumers could be improved.
- Reviewing whether processes and policies are effective in the fair treatment of vulnerable customers.

7.2 Management Information

Under Principle 6, West Buckland Bloodstock will have management information (MI) and measures in place to test whether they are treating their customers fairly including by delivering the six TCF consumer outcomes. The MI will demonstrate to both West Buckland Bloodstock and the FCA that it is consistently treating customers fairly and delivering the consumer outcomes.

To understand if vulnerable consumers are being fairly treated, we will identify and monitor MI that allows us to review the outcomes vulnerable consumers experience in comparison to other consumers. We will do this with reference to all of the aspects of our customer relationship and have regard to the TCF outcomes, or other outcomes the FCA has communicated are important to achieve for consumers in our sector.

West Buckland Bloodstock is committed to producing MI that captures outcomes for identified vulnerable customers and making sure this is discussed regularly at an appropriate level and escalated and acted on where necessary. Types of MI we will collect include

- *Business persistence: analysis of customer retention records – e.g. cancellation rates and details of why customers leave. This may flag where poor treatment is contributing to high turnover of customers*
- *Behavioural insights: consumer interactions and drop off rates; use of different communications channels including digital; consumer testing of financial promotions. This may flag where policies, processes and systems need to be improved (e.g. where there are barriers to consumer engagement or understanding).*
- *Training and competence records: analysis of records of staff training, including remedial actions where staff knowledge or actions were found to be below expectations*
- *File reviews: reviewing customer files and monitoring calls to check for errors and assess if customers were treated fairly*
- *Customer feedback: using formal and informal feedback from customers to identify trends and areas for improvement (e.g. complaints and comments made to the Firm but also comments and complaints on social media)*
- *Numbers of complaints: trends in numbers of complaints involving vulnerable customers in comparison to other customers*

8 Breaches of Vulnerable Customers Policy

Any breaches of the Vulnerable Customer Policy will be recorded on our breach log in conjunction with our Regulatory Breach procedure.

Appendix: Who to contact for information, support and advice.

Mental Health & Emotional Support

NHS Live Well: for advice on health and wellbeing <https://www.nhs.uk/live-well/>

Rethink Mental Illness: provides phone advice & information www.rethink.org Tel: 0300 5000 927 9:30am-4pm (Mon-Fri) Email: advice@rethink.org

Mind: information on mental distress, where and how to get help www.mind.org.uk Tel: 0300 123 3393 9am-6pm or Txt: 86463 Email: info@mind.org.uk

C.A.L.M: Aimed specifically at men. Helplines are open 365 days of the year www.thecalzone.net Tel: (Outside London) 0800 58 58 58 (London) 0808 802 58 58 from 5pm to midnight

Samaritans: Free 24-hour emotional support line if you are suicidal or in despair www.samaritans.org Tel: 116 123 Email: jo@samaritans.org

Saneline: emotional support line for people in mental distress www.sane.org.uk Tel: 0300 304 7000 4:30-10:30pm daily

Free and Impartial Debt Advice National

Debtline: offers free, impartial, and confidential debt advice www.nationaldebtline.org Tel: 0808 808 4000
9am-8pm (Mon-Fri) 9:30am-1pm (Sat)

Business Debtline: provides free and confidential advice to small businesses www.businessdebtline.org Tel:
0800 197 6026 9am-8pm (Mon-Fri)

Citizens Advice: free advice on debt, benefits, employment, housing etc www.citizensadvice.org.uk Tel:
(England) 03444 111 444 (Wales) 03444 77 20 20 Text: 03444 111 445 9am-5pm (Mon-Fri)

Step Change: offers free and impartial debt advice & debt solutions www.stepchange.org Tel: 0800 138 1111
8am-8pm (Mon-Fri) 8am-4pm (Sat)

Payplan: offers debt advice & debt solutions www.payplan.com Tel: 0800 280 2816 8am-8pm (Mon-Fri) 9am-
5pm (Sat)

Money Advice Service: free and impartial money advice www.moneyadviceservice.org.uk Tel: 0800 138 7777
8am-6pm (Mon-Fri)

Money Advice Trust: Free and impartial debt advice www.moneyadvicetrust.org

DebtAdvisoryService(Scotland): free impartial debt advice www.debtadvisoryservicesscotland.co.uk Tel: 0800
011 2322 9am-8pm (Mon-Fri)

Debt Advice (Northern Ireland): free impartial debt advice www.debtadvicenorthernireland.co.uk Tel: 0800
043 0550 Email: info@debtadvicenorthernireland.co.uk

Other Help & Support

Turn2us: benefits & grants search, information & resources to maximise income www.turn2us.org.uk Tel: 0808
802 2000

Shelter Housing: housing specialists www.shelter.org.uk Tel: 0808 800 4444 8am-8pm (Mon-Fri) 9am-5pm (Sat)

Alzheimer's Society: Support and advice for those impacted by dementia www.alzheimers.org.uk Tel: 0300 222
11 22

AgeUK: information, advice, and support for older people www.ageuk.org.uk Tel: 0800 678 1602 8am-7pm
every day of the year

Macmillan Cancer Support: support and advice for those impacted by cancer www.macmillan.org.uk Tel: 0808
808 0000 8am-8pm 7 days a week

Vulnerability Registration Service: Is a platform providing you with a single reference point for recording your
personal circumstances if you are looking to protect yourself against further debt or related financial problems
www.vulnerabilityregistrationservice.co.uk Tel: 024 7767 3992 or email info@vregservice.co.uk

