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# Aviva UKGI Policy



**For the fair treatment of customers  
in vulnerable situations**

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Document Owner: Sue Jennings



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# Policy Overview



# Policy Objectives

The objective of the policy for the fair treatment of customers in vulnerable situations (The Policy) is to set minimum expectations for the identification and fair treatment of customers in vulnerable situations and to ensure Aviva UK GI is compliant with the Financial Conduct Authority Guidance FG21/1 for firms' fair treatment of vulnerable customers (FG21/1). The Policy aims to support customers in vulnerable situations whilst not compromising controls designed to protect customers (and Aviva) such as financial crime and data protection controls.

This policy is underpinned by the Vulnerable Customers Minimum Standards for Aviva UK GI.

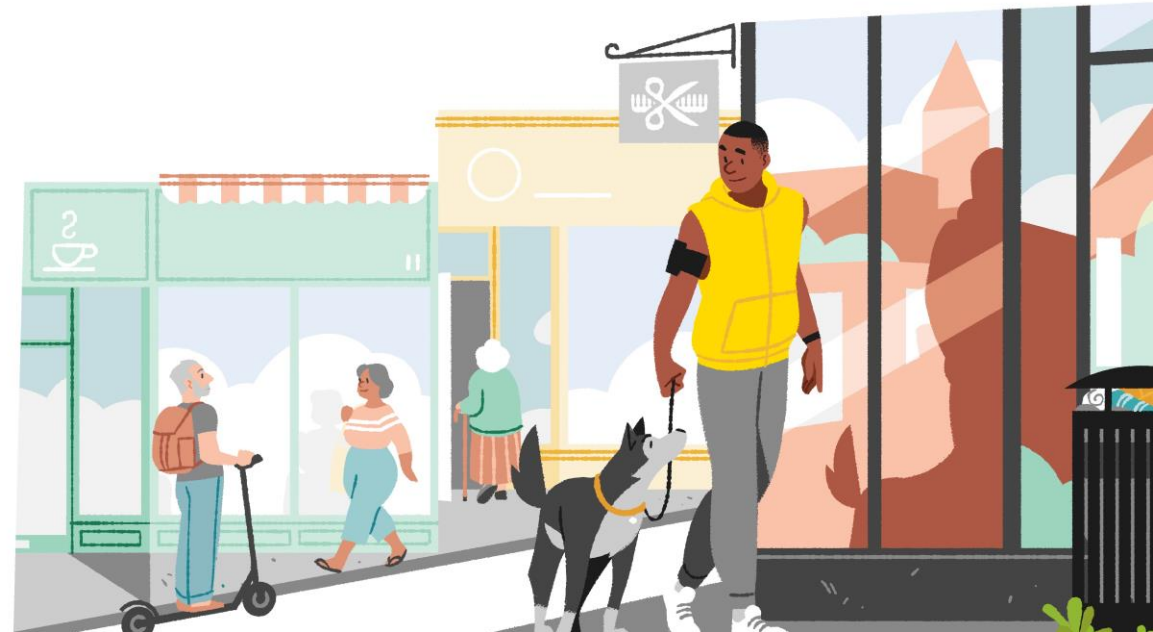
The Policy sets the expectation across UK GI businesses. Individual businesses and cells may wish to implement further procedures relevant to their business that are consistent with this Policy but specific to their business and customer needs.

Implementation of the Policy must be in line with the FCA principles of Treating Customers Fairly.

In addition to this Policy, Aviva has a duty to comply with other legal and regulatory obligations for vulnerable consumers such as the Equality Act 2010 and Mental Capacity Act 2005.

## Target Audience

The Policy should be applied in all Aviva UK GI businesses including their appointed service providers that are within the scope of the Financial Conduct Authority Guidance FG21/1 for firms' fair treatment of vulnerable customers.



# Aviva Definition of a Customer in a Vulnerable Situation

## Definition

Aviva has adopted the definition of a vulnerable customer as someone who, due to their personal circumstances, is potentially susceptible to detriment, requiring Aviva or a Partner to provide an enhanced and focused level of care.

Characteristics of vulnerability are likely to be complex and overlapping. For example, a life event like a relationship breakdown or bereavement may lead to further vulnerability such as mental ill-health or low resilience. This may be made worse if the customer has low or limited capability to engage with financial services or to manage their finances.

Our definition extends to customers who can readily be identified as less able to engage with the market or are potentially excluded due to inadequate accessibility and/or customers who would suffer disproportionately if things go wrong.

## Example

A life event like a relationship breakdown or bereavement may lead to further vulnerability such as mental ill-health or low resilience. This may be made worse if the customer has low or limited capability to engage with financial services or to manage their finances.



# The Aviva Vulnerable Customer Purpose

**We understand and respond to the individual needs of our customers to ensure a good customer outcome.**

To achieve our objective of the identification and fair treatment of customers in vulnerable situations, we:

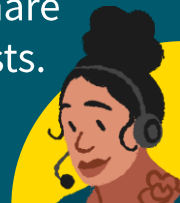
Will aim to **protect customers** in vulnerable situations from harm throughout the customer journey and encourage customers to disclose their needs.



Will take **time to understand our customers** individual circumstances and needs and we will endeavour to deliver customer service that responds flexibly to meet the needs of our customers.



Will **act with empathy and understanding**, encouraging customers to be open and honest with us, safe in the knowledge that the information they share will only be captured and used in their best interests.



Will take all **reasonable steps to support customers** in vulnerable situations but recognise there may be a limit to the support we can provide. We operate a signposting service to expert external sources, where appropriate, who may be better placed to **help customers**.



# FCA Guidance



# 2.1 FCA FG21/1 Guidance for Firms on the Fair Treatment of Vulnerable Customers

The Financial Conduct Authority Guidance [FG21/1](#) for Firms Fair Treatment of Vulnerable Customers is anchored to 6 Pillars as summarised below:

## Understanding customer needs

Understand the nature and scale of characteristics of vulnerability that exist in their target market and customer base.

Understand the impact of vulnerability on the needs of consumers in their target market and customer base, by asking themselves what types of harm or disadvantage their customers may be vulnerable to, and how this might affect the consumer experience and outcomes.

## Skills and capability

Embed the fair treatment of vulnerable consumers across the workforce. All relevant staff should understand how their role affects the fair treatment of vulnerable consumers.

Ensure frontline staff have the necessary skills and capability to recognise and respond to a range of characteristics of vulnerability.

Offer practical and emotional support to frontline staff dealing with vulnerable consumers.

## Product and service design

Consider the potential positive and negative impacts of a product or service on vulnerable consumers. Design products and services to avoid potential harmful impacts.

Take vulnerable consumers into account at all stages of the product and service design process, including idea generation, development, testing, launch and review, to ensure products and services meet their needs.

## Customer service

Set up systems and processes in a way that will support and enable vulnerable consumers to disclose their needs. Firms should be able to spot signs of vulnerability.

Deliver appropriate customer service that responds flexibly to the needs of vulnerable consumers.

Make consumers aware of support available to them, including relevant options for third party representation and specialist support services.

Put in place systems and processes that support the delivery of good customer service, including systems to note and retrieve information about a customer's needs.

## Communication

Ensure all communications and information about products and services are understandable for consumers in their target market and customer base.

Consider how they communicate with vulnerable consumers, taking into consideration their needs. Where possible they should offer multiple channels so vulnerable consumers have a choice.

## Monitoring and evaluation

Implement appropriate processes to evaluate where they have not met the needs of vulnerable consumers, so that they can make improvements.

Produce and regularly review management information, appropriate to the nature of their business on the outcomes they are delivering for vulnerable consumers.



# Understanding Customer Needs

**The needs of customers in vulnerable situations in our target market or customer base are likely to vary.**

Characteristics of vulnerability may result in customers having **additional or different needs** and may limit their ability or willingness to make decisions and choices, or to represent their own interests.

Customers in vulnerable situations may be at greater risk of harm, particularly if things go wrong.

**A greater level of care** is appropriate for these customers.

We take time to understand our customers individual circumstances and needs.

We will seek to **deepen our understanding** of the **characteristics of vulnerability** and the needs of our customers through research and customer insights.



# Skills, Capability and Culture

## Staff can influence outcomes for customers in vulnerable situations.

Customers in vulnerable situations are more likely to suffer harm when staff do not understand how vulnerability is relevant to their role, or if frontline staff do not have the skills and capability to recognise and respond to their needs.

## Everyone at Aviva receives vulnerability training at least annually.

Our people are provided with the skills and support to recognise characteristics of vulnerability and respond to the individual needs of our customers.

**Practical and emotional support** is available to all staff including access to the Employee Assistance Programme (EAP).

We have a network of **vulnerability and fraud champions** across the UK who can offer additional support to our customers and our people.



# Product and Service Design

**We will aim to design Products and services that are accessible, inclusive and produce fair outcomes whilst considering the needs of customers in vulnerable situations.**

If Aviva fails to do this, there is a risk that these customers 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 customers in vulnerable situations.

## Example

If products and services documentation or digital journeys include jargon or technical references that may not be relevant to them, some customers may find it more difficult to understand and they may purchase a product that does not meet their needs.



# Customer Service

**Customers in vulnerable situations are more likely to have different needs than average customers.**

**We take time to understand** our customers individual circumstances and needs.

**We act with empathy and understanding**, encouraging customers to be open and honest with us, safe in the knowledge that the information they share will only be captured and used in their best interests.

**We will aim to protect customers** in vulnerable situations from harm throughout the customer journey and encourage customers to disclose their needs.

**We will endeavour to deliver customer service** that responds flexibly to meet the needs of our customers, ensuring we consider the risks involved whilst being careful not to compromise controls already in place to protect customers (and Aviva) such as financial crime and data protection controls.

**We offer a referral service where customers can be signposted to expert support where appropriate.**

## Example

Customers may find some channels of communication challenging or stressful or need more time to understand information and make decisions.



# Communication and Marketing

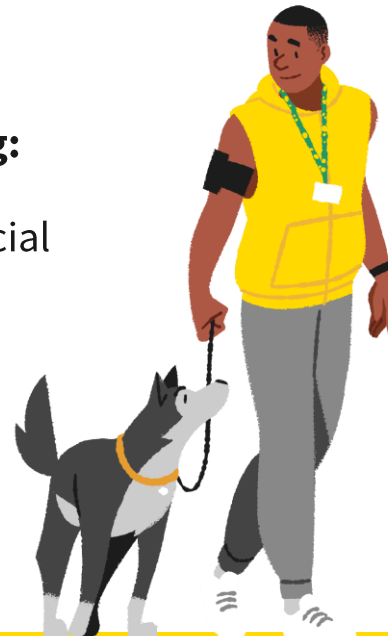
## **Failure to communicate with customers in vulnerable situations in ways they can understand may result in an increased risk of harm.**

Customers may not be able to understand the information they are sent or may struggle to communicate their needs to firms.

Low capability or physical disabilities may result in specific communication needs.

### **Several factors can drive low capability, including:**

- Low literacy, numeracy, poor knowledge of financial products and cognitive disabilities.
- Physical conditions can also result in specific communication needs.



Some temporary circumstances or characteristics can also mean that customers struggle to understand or take in information.

Aviva will aim to offer multiple communication channels so our customers can interact with us in a way that meets their needs.

We will aim to make our communications simple, clear, and understandable.

### **Alternate format communications are available including braille, large print and audio.**

“ Just under half of UK adults have a numeracy age of 11 or below ”



# Monitoring and Evaluation

**Business areas should monitor the actions they are taking to ensure they treat customers in vulnerable situations fairly and the outcomes they experience are in line with other customers.**

Monitoring in this way will allow Aviva to determine whether we are achieving **good outcomes for customers** in vulnerable situations and understand which activities and processes work well, and which ones need to be adapted to improve outcomes.

We will use management information to understand the experience of customers in vulnerable situations and take action where necessary to ensure good outcomes are achieved.

Where appropriate, we will look to deploy technology to enhance the support we offer our customers and strengthen our monitoring and oversight capability.

We are risk aware and have a strong robust control to mitigate any potential harms to customers.



# Appendix

# Additional Resources

Here are some useful tools and resources:

[Marketing D&I Toolkit](#)



[Business Disability Forum](#)



[Readability Guidelines](#)

