

Vulnerable Patient Policy



1.0 Introduction

Ensuring that patients in vulnerable circumstances are treated not only fairly, but with empathy and sensitivity to their circumstances is a growing priority for the **Financial Conduct Authority** and other regulators as well as Raby Road Dental. Vulnerable patients are likely to need additional assistance at some stage in order to avoid detriment (financial or psychological) when attempting to arrange appointments, discussing treatment plans, undergoing treatment, arranging insurance, making payments or arranging payment plans. The purpose of this policy is to ensure that the way in which we conduct our business does not have a negative impact on vulnerable patients.

A vulnerable patient is defined as someone who has personal circumstances that place them at a higher risk of detriment, particularly if a company does not act with the appropriate level of care.

Raby Road Dental is committed to ensuring that all its staff can identify vulnerable consumers, and that they are able to handle a situation involving a vulnerable customer with the required levels of care, attention and respect. A consumer may find it difficult to make an informed decision about their available options for a variety of reasons. The risk factors that contribute to consumer vulnerability in financial services include:

- low literacy, numeracy and financial capability skills
- physical disability
- severe or long-term illness
- mental health problems including common mental disorders (CMD)
- low income and/or debt
- caring responsibilities (including operating a power of attorney)
- being 'older old' 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).

Living with a disability, illness or diagnosis does not in itself make someone vulnerable. In the context of financial services, it is the person's situation and barriers to accessing such services that may make them vulnerable. Equally a person may be vulnerable without any disability, illness or diagnosis, for example if they are recently bereaved or frail

2.0 Identifying Vulnerable Consumers

For staff to correctly address the needs of a vulnerable patient, it is important to be able to identify them.

Risk factors that can help to identify a vulnerable patient include illness, disability, illiteracy, bereavement, and other impairments as indicated above. The patient may have indicated a vulnerability in correspondence or one or more of the following indicators may become apparent during a telephone conversation or meeting.

key indicators that often highlight a risk factor include:

- a) Can the patient hear everything you are saying, and do they understand what you are saying? Do they ask you to slow down or to speak louder? Are you sure they have heard and understood all the relevant details? Do they ask you to clarify any details or advise they do not understand terminology being used?
- b) Does the patient stay on topic and hold a conversation that is coherent, or do they appear distracted or confused? Do the patient's responses remain relevant and are their questions typical for the discussion being had?
- c) Does the patient take an unusually long amount of time to answer a question that suggests they are struggling to process the information provided to them?
- d) Does the patient indicate they may have a disability or impairment based on their voice, pronunciation, breathing, hearing or ability to understand the conversation? Are they coherent and fluent in the language being used?

3.0 Dealing with Vulnerable Consumers

Just because somebody is vulnerable does not automatically mean that they are unsuitable for the products and services the firm supplies. As soon as we think we may be engaging with a vulnerable patient we should take care to adhere to the requirements set out in this policy.

When dealing with vulnerable patient, staff must remain aware of the following guidelines:

- a) Remain patient and empathetic; do not rush the client, interrupt, or appear impatient. Allow the consumer to arrive at their own decisions and process the information sufficiently.
- b) Ensure the client is able to hear and understand what you are saying, ask the client to explain their understanding of what you are telling them, or include questions as frequently as possible to ensure they are aware of and understand what is being discussed.
- c) Allow the patient to explain thoroughly; do not assume you already know what their requirements or needs are, and do not finish off their sentences which often implies you are

rushing them to progress the conversation. Listen carefully to the patient and remain conscious of any absence of understanding, hints at unawareness, or forgetfulness of topics already discussed.

- d) Clarify that the patient is comfortable with the standard and method of communication and offer to provide details in an alternate format such as via post or email for clarity. Before acting on a vulnerable consumer's advice, ask if there is anybody else they need to speak to about their decision.

When a vulnerable patient has been identified a relevant note will be added to their dental records to ensure awareness extends to all staff at the practice who deal with the patient. It is important that we maintain a consistent level of service, and that a vulnerable consumer receives adequate care irrespective of which staff they liaise with. Any such notes should describe the reasons for the assessment of the patient as vulnerable and be respectful.

Mental capacity

Mental capacity relates to the ability of the individual to understand and to retain and evaluate relevant information in order to be able to decide based on that information.

If a member of staff believes that a vulnerable consumer is unable to decide for themselves, they should attempt to identify a carer or next of kin who is authorized to act on their behalf with respect to their financial affairs. In many cases, a parent or spouse will represent the interests of the vulnerable patient. All staff members who deal directly with patients, regardless of department or position, must familiarize themselves with this policy and ensure they understand it completely.

It is acknowledged that there are limits to what we can reasonably do to form a view as to whether a patient has, or may have, some form of capacity limitation. However, we do ask all patients to complete a full medical history form prior to their first visit to ascertain whether there are any issues relating to their health or general well-being which may be relevant to the consideration of any product or decision by the practice.

If a patient provides information which indicates that they do, or may, have some form of mental capacity limitation that might impact on his ability to make an informed decision, this should not lead to him automatically being denied access to the product or service being sought. It will act as a trigger for us to consider what reasonable steps might be taken in order to amend our usual processes to ensure that the patient is treated fairly and leads to a positive outcome for the Patient.

4.0 Product Governance

The design and distribution of new products will consider the requirements of vulnerable patient's and this will include collecting relevant management information to monitor the company's performances in treating vulnerable customers in accordance with the requirements set out in this policy.

5.0 Training

Our vulnerable patient and Safeguarding Lead is Luke Sergeant. All staff undergo training courses on safeguarding vulnerable patients annually with all staff. A review of the policies relating to safeguarding and vulnerable patient's is carried out annually.