



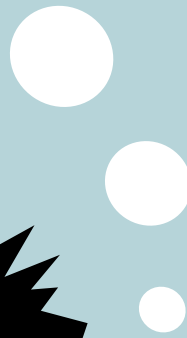
MONEY AND  
MENTAL HEALTH  
POLICY INSTITUTE



# THE EQUALITY ACT AND MENTAL HEALTH

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A practical guide for essential services firms



# The Equality Act and Mental Health – a practical guide for essential services firms

Our report **Time To Act**, outlines the legal duties firms have to customers with mental health problems under the Equality Act 2010. This guide for firms goes further, detailing the common challenges people with mental health problems face when dealing with essential service providers and the practical, tangible changes firms could make to help ensure compliance with the Equality Act.

## Who is this guide for?

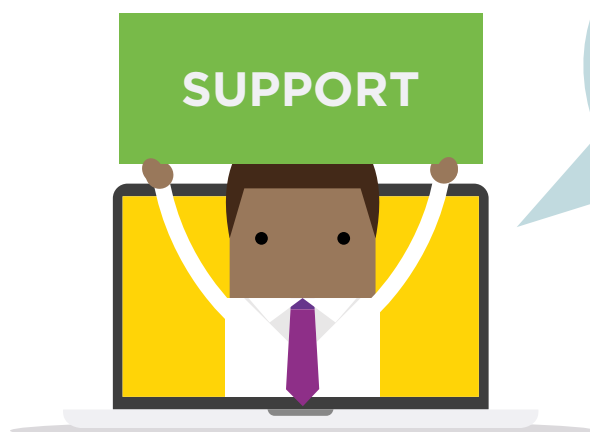
This guide is aimed primarily at financial services providers, energy suppliers, water companies and telecoms firms, but other organisations like housing associations, debt collection agencies and councils may find it useful.

Within these organisations we'd urge conduct teams, vulnerability teams, customer care, legal teams, and Executive Offices to consider this guidance.

## Why it's important

Essential service providers have a legal duty to anticipate the needs of disabled customers and make reasonable adjustments. But research by Money and Mental Health suggests that many are falling short of their responsibilities towards customers with mental health problems and exposing themselves to legal risk.

There is a commercial incentive for providers to get things right for people with mental health problems. One in four people experience a mental health problem each year, and the way that providers support people with mental health problems is an increasingly important consumer consideration. Six in ten people with mental health problems (59%) say they would be more likely to choose a provider if they knew it offered additional support for people with mental health problems.<sup>1</sup>



**59%**

of people with mental health problems would be more likely to choose a provider who offered additional support for people with mental health problems

1. Money and Mental Health analysis of Opinium online survey of 2,000 people, carried out 29 October – 2 November 2021. Data is weighted to be nationally representative.

## Recommendations developed through the voices of lived experience

We've worked closely with members of our Research Community, a group of 3,000 people with lived experience of mental health problems, to explore the challenges that people with mental health problems face when dealing with essential service providers and consider what sort of adjustments could help to address these common problems. Based on this, we set out two key recommendations to help providers meet their obligations, along with practical detail about how to achieve this.

We recommend that all essential service providers:

- **Offer a basic set of adjustments to address the most common challenges that customers with mental health problems face**, which is known about and used throughout the company, including front-line teams and service design.
- **Improve their process for encouraging and managing customer disclosures of mental health problems.**

Below we provide more detail on the needs of people with mental health problems and suggestions on what adjustments could be used to support customers.

We urge providers to consider these adjustments in full. Many providers will read this list and will recognise some of these adjustments as things they already offer. Where that is true we urge providers to consider the policy-practice gap – considering:

- Are these adjustments known about and used throughout the firm?
- Are they proactively offered to customers, including those who haven't disclosed a mental health problem? Or are they universally built into product and service design?
- Are you encouraging disclosure to ensure you are reaching the people who need adjustments to be offered?

We've purposely tried to make this guide comprehensive and practical for firms to use, but we also have a Mental Health Accessible team which works directly with providers who want to ensure they're delivering the best service for people with mental health problems. We work with providers to help them have a greater understanding of the needs of their customers with mental health conditions, and advise on how to implement adjustments or service design changes to improve support.

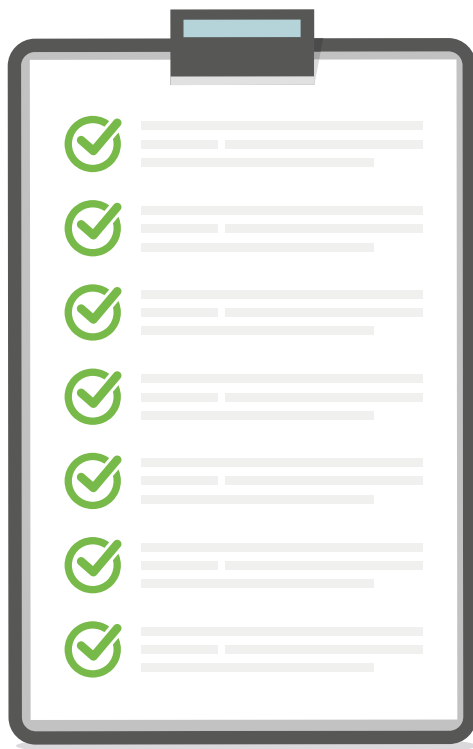
To get in touch with this team and discuss how they could work with you, please email Alice Rose, Head of Strategic Partnerships; [alice.rose@moneyandmentalhealth.org](mailto:alice.rose@moneyandmentalhealth.org)

## Basic adjustments for people with mental health problems

We have identified seven basic adjustments that all essential service providers should make available for customers with mental health problems.

Some of these could be offered to customers following disclosure or the identification of a need for additional support, others may be best applied universally for all customers – on the understanding that they will particularly benefit those with mental health problems:

- The option to opt out of certain communications channels
- Simplified versions of written communications
- Reminders
- Money management tools
- Adjustments to help customers to feel in control when staff visit their home
- Extra help with decision making
- Flexible third party access options.



## The option to opt out of certain communications channels

Mental health problems can profoundly affect our ability to communicate. Many customers with mental health problems find it acutely stressful to use certain communication channels, and some will be unable to receive messages sent using inappropriate channels. This is not simply a matter of preference, an unexpected phone call can trigger panic attacks or even suicidal ideation.

“When my mental health is bad, I live in a place of fear, shame, worry and anxiety... I can't make phone calls, or even answer the phone when I get to this stage. I struggle to use the phone at any time, even to call my family.”

*Expert by experience*

To address this, providers should enable customers to opt out of communication channels that they find difficult or distressing to use. More than half of people with mental health problems who are protected by the Equality Act would find the option to opt out of phone calls useful (52%), nearly five million people, and over one in three would value the option to opt out of letters (35%).<sup>2</sup>

Most providers already use multiple outbound communication channels, so this adjustment shouldn't require significant development, rather it requires providers to use their existing channels more effectively. Offering this inexpensive adjustment will reduce customer anxiety and help providers to demonstrate that they understand mental health problems.

## Benefit for your business

Practically, it will also increase the likelihood that customers receive and understand information that is shared with them.

Where a provider is legally required to send a letter, clearly they must do so, but if they know that a customer finds receiving letters stressful they should take steps to mitigate this. For example, a provider could forewarn the customer using a communication channel that they are more comfortable using, to explain what the letter says, or include text on the envelope designed to mitigate some of that worry.

Providers must also ensure that they have multiple inbound communication channels, so that customers are not expected to use one particular channel to access any aspect of their service.

## Making it work

We often hear from providers who tell us they already offer multi-channel access and collect communications preferences. However, we also hear from customers who tell us that their providers have emailed them, as per their communication preference, but that the email then asks them to call to complete a task, which is the communication phobia they struggle with. Multi-channel access needs to be available throughout a customer journey, not just at the beginning.

2. Money and Mental Health analysis of ONS mid-year population estimates 2020 and Opinium online survey of 2,000 people, carried out 29 October – 2 November 2021. Data is weighted to be nationally representative.

### Simplified versions of written communications

People with mental health problems often struggle to understand important written information that providers share with them, like bills, terms and conditions and policy documents. Difficulties processing information or concentrating when unwell are common and the design of written communications often compounds these problems. This can lead to missed payments, people misunderstanding important account terms and a range of other harms.

“I don't really understand the bills and the way they break it down. I find all the small print pages too difficult to read so I never read them.”

*Expert by experience*

To adjust for these difficulties, all providers should offer simplified versions of written communications that are designed with the needs of people with mental health problems in mind. Nearly half (44%) of people with mental health problems who are protected by the Equality Act would find simplified versions of written communications useful, roughly 4.25 million people.<sup>3</sup>

#### Benefit for your business

It is likely that this adjustment would also be useful for disabled people with other conditions that cause cognitive impairments, like dementia and learning disabilities.

We strongly recommend that providers involve people with mental health problems in the design and testing of these alternative written communications. Providers should also consider the following key principles for simplified written communications:

- Remove technical language, or explain it in non-technical terms
- Minimise the quantity of content as much as possible and leave plenty of space between content

- Highlight key messages or action points
- Use bullet points to break down complex tasks or processes
- Minimise use of numbers and carefully explain any figures that are used
- Use a supportive tone and provide prominent information about how a customer can access additional support if needed
- Develop and test written communications with people with mental health problems.

While firms may be required to use specific phrases or formats to comply with regulation and guidance, taking the steps outlined above in addition to any mandated information will increase the odds of customers engaging with and understanding the most vital elements.

“Provide the key points at the top of the letter in bold. That way I can prioritise how urgently I need to try and understand the rest of the letter. Can it wait a day or two until I'm in a better headspace, or do I need to use up some of my limited resources today in trying to deal with this?”

*Expert by experience*

#### Making it work

For the same reasons, we also find significant demand for essential service providers to offer simplified versions of various other aspects of their services. In particular, many Research Community respondents felt that simplified tariffs or pricing structures would make it easier for them to understand costs and avoid financial difficulty when unwell. Offering products with fewer features, such as a basic bank account, could also be a reasonable adjustment for someone who struggles to manage a current account when unwell but needs access to banking

3. Money and Mental Health analysis of Opinium online survey of 2,000 people, carried out 29 October – 2 November 2021. Data is weighted to be nationally representative.

## Reminders

Memory problems are a common symptom of several mental health conditions, and a side effect of some medication prescribed for poor mental health.<sup>4</sup> Without support, people with memory problems will often miss payments, even when they can afford to pay, and can struggle to engage with support from providers.

“Due to my issues I have short term memory issues, send a text message saying ‘your payment for ..... is due today’, or an email saying the same thing. If you are having problems contact us and we have a small team that can deal with and have an understanding of mental health issues.”

*Expert by experience*

Providers can make a simple, but effective, adjustment by offering additional reminders to help customers with memory problems. Some essential service providers do offer payment reminders, often as an opt-in service, but they are not consistently suggested as an adjustment to customers with mental health problems. Half of people with mental health problems who are protected by the Equality Act would find a reminder message when payments are due useful (49%), but just one in four have ever been offered this (24%).<sup>5</sup>

The tone of reminder messages is crucial. Providers should design reminders that are supportive and informative, as messages that are perceived as threatening can be counterproductive and cause customers to disengage. Testing reminder text with people with experience of mental health problems may be useful. Providers should also offer to send reminders using a range of communication channels and should ask their customers how many reminders they require, recognising that some people have more severe memory problems than others and will be entitled to more support.

Beyond payments, providers should consider other aspects of their service where they could send reminders to reduce the pressure on customers with mental health problems to remember things. People with mental health problems often report having a useful conversation with a provider, but forgetting key details or action points and struggling to take the action required. More than half of people with mental health problems who are protected under the Equality Act would find it useful to be sent a summary after speaking to a provider (51%), nearly 5 million people.<sup>6</sup> Energy providers should offer to send additional reminders when a meter reading is due.

Sending payment or metre reading reminders, call summaries or webchat transcripts are examples of adjustments that could be built in universally for all customers, not just offered following a disclosure. As well as reducing reliance on disclosure and reaching customers with mental health problems who aren't able to ask for support, taking this 'universal design' approach will have wider business benefits by improving customer experience more broadly.

### Making it work

Getting the tone and content of reminders right is crucial to ensure they minimise distress and maximise help seeking behaviour. We encourage firms to take an inclusive design approach, and incorporate the voice of lived experience into the drafting of these communications. At Money and Mental Health our Research Community often provides feedback to providers on new communications, helping them to get the message right.

4. Holkar M. Seeing through the fog. Money and Mental Health Policy Institute. 2017.

5. Money and Mental Health analysis of Opinium online survey of 2,000 people, carried out 29 October – 2 November 2021. Data is weighted to be nationally representative.

6. Money and Mental Health analysis of Opinium online survey of 2,000 people, carried out 29 October – 2 November 2021. Data is weighted to be nationally representative.



## Tools to help manage money or access to content

Mental health problems often have a significant impact on people's financial capability, making it harder to be a conscientious, proactive consumer and even to regulate financial behaviour. Some people experience increased impulsivity when unwell, which can lead to difficulties controlling spending, while others can disengage from financial management altogether.

This is a major driver of higher levels of problem debt among people with mental health problems. Over a third (35%) of people with mental health problems who are behind on payments cite difficulties managing money as a key reason for this.

"I spend more money when I'm on a manic high. This has led me into debt in the past."

*Expert by experience*

Essential service providers are well placed to offer practical tools to help customers use their services more safely and avoid these problems. There is huge potential for financial service providers, in particular, to offer this sort of functionality, but we think other essential service providers can play a role here too. We have identified two main categories of tools that providers could offer as adjustments:

- **Tools that automate or support with complex aspects of money management** – for example tracking spending, calculating and adjusting budgets, comparing prices and building up savings. Nearly four in ten people with mental health problems who are protected under the Equality Act would find tools to help with budgeting useful (37%).<sup>7</sup> Energy, telecoms and water providers could provide tools that help customers monitor their consumption and forecast costs.
- **Control settings** – that allow people to protect themselves from harmful behaviour during periods of poor mental health by putting blocks or limits in place. This could include spending limits and the ability to block transactions to certain types of merchant or at certain times, or content filters from a broadband provider. For control settings to be effective it must not be possible to remove or loosen them immediately. Mobile phone providers could provide similar options, such as the ability to limit data usage or disable spending on additional services through a phone contract.

Building a new tool will cost money, but this may be considered reasonable given the number of disabled customers who struggle with money management and the extent of the harm that these difficulties can cause. Tools developed for people with mental health problems will also often deliver value for other customers. Aspects of money management that are impossible for people to deal with when unwell may be frustrating or boring tasks for people without mental health problems.

For those providers who do already have these sorts of tools in place we encourage them to routinely highlight these tools in interactions with vulnerable customers and proactively offer them to customers who are struggling with money management or accessing content like gambling online.

### Making it work

Creating new tools can be a significant investment, which is why we urge providers to ensure they seek advice from the specialist experts and incorporate the voice of lived experiences at every stage of testing and design. Many specialist organisations, including Money and Mental Health, can act as a 'critical friend' for providers setting up new tools.

<sup>7</sup> Money and Mental Health analysis of Opinium online survey of 2,000 people, carried out 29 October – 2 November 2021. Data is weighted to be nationally representative.

## Adjustment to help customers to feel in control when staff visit their home

For many people with mental health problems, the home is a safe place which plays an important role in their psychological security. A visit from an essential service provider, for instance to read a meter or resolve a broadband issue, can jeopardise this sense of security and cause significant distress if it is poorly handled.

“Our homes are our one safe space and anyone entering this needs to understand that this is extremely important to people with mental health.”

*Expert by experience*

There are a number of small adjustments that providers can make to help customers retain a sense of control and avoid causing distress when a staff member visits. All providers should offer customers the option to book an appointment at a time that works for them, rather than visiting without warning or designating a time. This puts the customer in control and allows them to prepare for the visit, for instance to invite a friend over for support or to leave the house before staff arrive and let someone else handle the interaction. Uncertainty about when staff will arrive can breed anxiety.

“The anxiety of waiting and waiting and perhaps nobody coming in the end exacerbates the worry of anyone coming at any time. At least a fixed appointment minimises the time for worrying as far as is possible.”

*Expert by experience*

Providers can further reassure customers with mental health problems by offering a password scheme, so that all visiting staff use a password to verify that they work for the provider. This simple step can ease fears about abuse and scams. Many energy providers offer this option, and it has provided huge relief for some members of our Research Community.

Beyond these adjustments, which should be useful for many customers with mental health problems, some people will have specific needs that require a different approach. For instance, some customers with obsessive compulsive disorder will be anxious about staff bringing germs into their home, and may require them to follow a certain cleaning protocol before entering. People who experience post-traumatic stress disorder relating to domestic violence may feel unsafe when unfamiliar staff enter their home. Others may require more time for visits, so that staff can explain the work they are doing or speak to the customer to put them at ease before entering the home. Providers who send staff to customer's homes should be proactive, asking customers with mental health problems about their needs and exploring what adjustments they can offer if a visit is required. All staff that visit people's homes should receive at least basic training to help them understand mental health problems and respond appropriately.

“My [energy] meter reader gentleman is lovely – he will stand and chat to me and waits until I am relaxed before he even tries to come into my home. He is incredibly friendly in a professional manner – not forceful in any way.”

*Expert by experience*

### Making it work

In some cases, providers will already have adjustments available to help customers feel in control when staff visit their home. However, it can be challenging to reliably identify all customers who would benefit from these, and we still hear from customers who tell us visits happen without warning, or they wait all day for visits that don't happen. Routinely offering these adjustments to all customers would give a better experience to everyone, whilst making significant improvements for customers with mental health problems.

## Extra help with decision making

Poor mental health commonly affects people's ability to think clearly and make decisions, at times it can affect people's mental capacity to make certain decisions. Complex decisions, like choices about repayment plans or tariffs, can seem overwhelming without support, and even seemingly small decisions about essential services can become time consuming and stressful. The way that providers handle interactions with customers experiencing these difficulties has a significant bearing on their ability to make decisions.

“Support to understand how to read, and digest, the information received, or required by the company would be beneficial. Knowledge is power and if we don't feel knowledgeable then that's where the problems can start.”

*Expert by experience*

Decision making limitations are common, so all essential service providers should have clear processes for adjusting interactions for customers experiencing these difficulties. Almost half of people with mental health problems who are protected by the Equality Act would find extra help when making decisions about their account useful (44%), over 4.25 million people.<sup>8</sup> Providers can make adjustments before, during and after interactions with customers who need help with decision making, to support them to make independent decisions. Providers should be mindful that customers' decision making ability, and the need for support, will often fluctuate with their mental health.

- **Before** – Frontline staff should be prepared with training and practical resources, like the BRUCE protocol, to help them support customers who need help with decision-making.<sup>9</sup> Before a complex interaction, for instance a conversation about debt repayment, providers should share information in advance to help the customer feel prepared.

This should contain basic details about what the conversation will entail and what the customer will need for the conversation.

- **During** – Staff may need to share information more slowly, break decisions into chunks and check that the customer understands what is being discussed as they go. Some customers will need more time to make decisions and staff should not put them under pressure, it may take multiple sessions to resolve complex issues. Staff should record information about customers' individual needs and tips for supporting that customer in their notes.
- **After** – Providers should send a follow up message to reiterate any decisions that were made and why. This can be practically useful for customers and can help to ensure that there is a shared understanding of what was decided.

- “1. Ask how that [mental health problems] might affect any conversation. E.g when stressed and anxious I can be slow to respond and sometimes ruder than normal or need things repeated.  
2. Check for understanding more than they might – maybe ask me to tell them what I understand by what they have said.  
3. Take their time – feeling rushed is a real trigger.”

*Expert by experience*

### Making it work

Many providers will have customer service team policies that support these protocols, but we know there is often a policy-practice gap, and we urge firms to consider how consistently this approach is being implemented by customer service colleagues and if customers can be guaranteed this level of support at every interaction regardless of communication channel.

8. Money and Mental Health analysis of Opinium online survey of 2,000 people, carried out 29 October – 2 November 2021. Data is weighted to be nationally representative.

9. Fitch C, Evans J, Trend C & Farmer T. Vulnerability: a guide for lending. PFRF & Money Advice Trust. 2017.

## Flexible third party access options

People with mental health problems often rely on support from friends and family to manage their finances and deal with essential services, particularly at times when they are acutely unwell and unable to manage independently. However, tools for sharing decision-making, like Power of Attorney, don't work well for people with mental health problems, so many rely on risky workarounds like sharing passwords and PINs.<sup>10</sup> This lack of appropriate tools exposes people with mental health problems to a risk of abuse and means that some can't get the support they need. We find strong demand for flexible delegation tools that would allow people with mental health problems to delegate limited powers or account visibility to a third party, without ceding full control.

"I ask my husband to deal with the calls but often the companies will not speak to him and insist on talking to me. This makes me very anxious."

*Expert by experience*

Some providers do offer more flexible delegation options. For instance, energy companies can send copies of bills and other correspondence to a nominated third party, and some banks offer a 'carers card', an additional debit card that a third party can use for limited purposes such as grocery shopping. However, these are limited examples and these existing adjustments are not routinely offered to customers with mental health problems, so few benefit from them. Four in ten people with mental health problems who are protected by the Equality Act would find the option to nominate a trusted person to help manage their account useful (38%), but just one in seven (13%) have been offered this.<sup>11</sup> Providers should take steps to publicise existing flexible third party access options and should ensure that all customers who they know have mental health problems are offered this support.

"If you have mental health issues then a partner, relative should be put on as a representative to deal with complaints or questions about the account. As there are times when you physically cannot function."

*Expert by experience*

Beyond these limited examples, all essential service providers, and particularly financial service providers, should develop tools that facilitate flexible and safe third party access. This should include tools that could give a third party visibility over an account, or notifications of worrying activity on an account, allowing them to discuss issues with the account holder and help them find a solution. Providers should also allow customers to delegate control over some parts of an account but not others, for example, the ability to set and manage spending limits, but not control day-to-day spending.

## Benefit for your business

This functionality will require initial investment, but it could facilitate a step change in third party support, preventing many customer problems from arising and saving providers money over time. It would also be useful for many vulnerable customers who don't have mental health problems and their carers.

## Making it work

Money and mental health research has explored in detail how third party access tools can help customers with mental health problems and those who support them, as well as the consequences for individuals and firms of failing to provide this support. Our report 'A little help from my friends' gives a detailed overview of the evidence and makes tailored recommendations for different essential services sectors.<sup>12</sup> Our Mental Health Accessible team can also work with providers to make more tailored recommendations or test tools and products in development.

10. Bond N, Evans K and Holkar M. A little help from my friends. Money and Mental Health Policy Institute. 2019.

11. Money and Mental Health analysis of Opinium online survey of 2,000 people, carried out 29 October – 2 November 2021. Data is weighted to be nationally representative.

12. Bond N, Evans K and Holkar M. A little help from my friends. Money and Mental Health Policy Institute. 2019.

## Disclosure of mental health problems

Not every customer with mental health problems will feel comfortable, or be able to disclose information about their condition, and providers still have a duty to anticipate the needs of disabled customers that don't share this personal information. Identifying which adjustments could be applied universally can help here, could all customers be given clearer communications, better multi-channel access and more timely payment reminders? This would give a better experience to all customers, but provide a vital adjustment for many customers with mental health problems.

However, in order to provide some reasonable adjustments to customers with mental health problems, essential service providers need to know who they are and what they need. This may be the case where adjustments are too expensive to build into a universal offer, or where they might not be desirable to all customers. To achieve this, providers must take steps both to encourage customers with mental health problems to open up and also to ensure that every disclosure is handled sensitively and effectively.

Providers must recognise that, for many people, telling an essential service provider about your mental health problems is a daunting prospect. This information is often deeply personal and even the act of telling a provider can be re-traumatising, it can remind people of the most difficult times in their lives. Providers must build processes that recognise the bold step that the customer has taken and treat them with respect.

**We have developed a set of 12 principles for encouraging and managing disclosure of mental health problems.**

1. **Be proactive about your support offering** – the main reason customers don't disclose mental health problems is because they don't realise that providers can help. Providers can overcome this by proactively telling customers about the value of disclosing problems and explaining what support they can offer people with mental health problems specifically. We also recommend that providers share information about the adjustments they can offer as part of their onboarding process and on their website.

"If a service provider could arrange for customers to automatically be asked if they might need extra help due to mental illness and if so, give a list of choices that might help. Maybe allowing a little extra time for overdrafts to be brought into line, or using emails instead of telephones and letters."

*Expert by experience*

2. **Address common concerns** – people with mental health problems cite concerns about discrimination and fears that their credit score will be negatively affected as key reasons for not telling providers about their mental health problems.<sup>13</sup> As well as making the positive case for disclosure, providers should address these common concerns in disclosure conversations and in materials about the value of disclosure.
3. **Provide multiple channels for disclosure** – people with mental health problems often find certain communication channels inaccessible or stressful to use, in particular the telephone. Providers must ensure that there are multiple communication channels that customers can use to complete a full disclosure journey. This should include a self-serve online journey.

<sup>13</sup>. Money and Mental Health analysis of Opinium online survey of 5,001 people, carried out 25 June – 22 July 2021. Data is weighted to be nationally representative.

4. **Record customer needs** – being asked to repeat information about mental health problems can be a frustrating and stressful experience. Providers must equip staff with systems to record information about customers' vulnerabilities, so that they aren't forced to repeat disclosures. Crucially, staff should be encouraged to record information about customers' needs, recording 'this customer needs support with their memory' is more instructive than simply recording 'depression'.

"I don't understand the fact that you get the strength to inform the so-called essential providers and they don't keep a record of it. How hard is it to keep a record of your needs, but no instead you have to inform them each and every time you contact them."

*Expert by experience*

5. **Embed established good practice for key conversations** – providers should embed the TEXAS and BLAKE protocols for disclosures of mental health problems and suicidality.<sup>14</sup> However much training frontline staff receive, conversations about mental health can be challenging. These tools help staff to structure sensitive conversations and ensure they get the basics right. Following these protocols should be a focus of quality assurance.
6. **Compassion and reassurance go a long way** – living with mental health problems can be an isolating experience, and even people struggling with common challenges can feel alone and guilty for asking for help. Staff should be compassionate and reassure customers that they are here to help.

"When I am afraid or my trauma has been triggered my thinking collapses and I can't cope. They become frightening and persecuting and it's one big mess. I need careful handling. Reassurance, warmth, empathy and understanding. I am not stupid I am mentally unwell."

*Expert by experience*

7. **Don't belittle or deny mental health problems** – too often we hear examples of essential service staff dismissing the impact of mental health problems or suggesting that a customer is pretending to be unwell. Providers must be clear with staff that this is not acceptable.
8. **Ask what you can do to help, but don't expect the customer to have all the answers** – when a customer discloses a mental health problem, this is a golden opportunity to understand their needs. Staff should always ask what they can do to address any challenges the customer faces when using the service. However, customers can't be expected to have all the answers. Staff can help by describing adjustments that are often useful for people with mental health problems and explaining how they can practically help. Legally, there is no expectation on disabled customers to suggest what a reasonable adjustment might be, this is a duty on providers, but asking the question can be a useful source of information and can help to build trust.

"Don't be afraid to ask me, and don't be afraid to ask me things they don't understand. It's refreshing and appreciated when people try to understand. It helps me and it educates them."

*Expert by experience*

14. Evans J, Fitch C, Collard S, Trend C. Vulnerability: the experience of debt advisers. Money Advice Trust & PFRC. 2018

**9. Mental health training for all frontline staff** – one in four people will experience mental health problems each year, rising to half of people in problem debt.<sup>15</sup> All frontline staff will encounter customers with mental health problems and they must receive at least basic training to help them identify signs of distress and respond appropriately. To be clear, people with mental health problems do not expect or want healthcare advice from essential service staff, but they expect staff to understand their needs and how they relate to the service. Our practical guide, **The need to know**, contains detailed information on understanding different mental health problems.<sup>16</sup>

“Mental health is rapidly increasing so it’s no longer unusual to deal with someone with depression like me. So more training should be normal with public facing operatives.”

*Expert by experience*

**10. Provide guidance for staff** – training is essential, but not sufficient. Providers should equip staff with resources that they can use in-conversation, to help them understand and support customers with mental health problems. This should include information about common challenges that people with mental health problems struggle with and adjustments that can be offered to address them.

**11. Clear referral processes** – customers will sometimes present with needs that are beyond the remit or expertise of essential service staff. It is essential that providers have clear processes for these instances, so that staff are confident how and when to refer customers to key services, such as specialist mental health services, the Samaritans and free debt advice. Wherever possible, customers should be offered warm referrals to support services as more vulnerable customers can struggle to follow signposting.

**12. Focus on quality** – managing disclosures of mental health problems effectively is a key element of treating vulnerable customers fairly and it should be a focus of quality assurance. In particular, we recommend that providers ensure that staff are following the TEXAS and BLAKE protocols,<sup>17</sup> recording relevant information about customer needs and offering appropriate reasonable adjustments.

15. Holkar M. Mental health problems and financial difficulty. Money and Mental Health Policy Institute. 2019. Derived from Adult Psychiatric Morbidity Survey 2014: covers England only.

16. Bond N and Fitch C. The need to know. Money and Mental Health Policy Institute and Money Advice Trust. 2020.

17. Evans J, Fitch C, Collard S, Trend C. Vulnerability: the experience of debt advisers. Money Advice Trust & PFRC. 2018.



## Working together

At Money and Mental Health we have a team which works with providers to help them implement changes to better support customers with mental health problems. This team works closely with our Research Community to incorporate the voice of lived experience into our consultancy work with providers, helping firms take an inclusive design approach.

Our team has experience in reviewing new customer communications, customer journeys and third-party access policies amongst other things. The recommendations we make to firms are founded in our years of research and expertise working in the accessibility sector.

Throughout our consultancy work we consider how what we are assessing meets the expectations of:

- The Equality Act 2010
- The FCA's Vulnerability guidance
- Accessibility from a mental health perspective.

We routinely review the assessment to ensure it maps well to new and emerging regulatory requirements, such as the FCA's Consumer Duty or new vulnerability guidance from other sector regulators.

To chat with us further about this guidance or how we could help your firm, please get in touch with Alice Rose, Head of Strategic Partnerships at Money and Mental Health. [alice.rose@moneyandmentalhealth.org](mailto:alice.rose@moneyandmentalhealth.org)









The Money and Mental Health Policy Institute is an independent charity, set up by Martin Lewis in 2016, committed to breaking the link between financial difficulty and mental health problems.

The Institute conducts research, develops practical policy solutions and works in partnership with both those providing services and those using them to find what really works.

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