

# Mental health disclosure: encouraging, responding, recording

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# Disclosure

/dɪsˈkləʊʒə/ noun

well known and established pillar of vulnerability strategies

## FCA

“Firms should... set up systems and processes in ways that will support and enable vulnerable consumers to disclose their needs.” (2021)

## Ofgem

“We want to see evidence that there has been an improvement to support consumers to self identify.” (2019)

## Ofwat

“It is useful to encourage customers in circumstances that make them vulnerable to disclose their need.” (2016)

## Ofcom

“Providers should encourage customers to tell them about any specific accessibility or customer services needs they have.” (2020)

# Disclosure

/dɪsˈkləʊʒə/ noun

where something private and personal is shared

*“It was a difficult choice to disclose – I wasn’t sure if I would end up in a better position, or just live to regret ever telling them.”*

[consumer with lived experience]

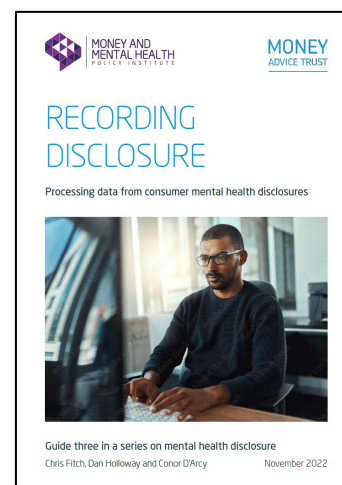
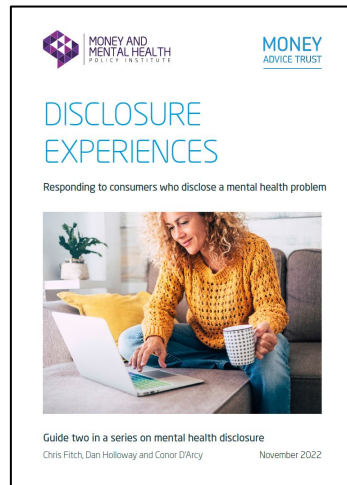
*“You never know what someone is going to tell you – but a lot of people are having a very difficult time, and it can be emotional to take these calls.”*

[frontline staff member]

# Disclosure

/dɪsˈklɒʒə/ noun

little research on what happens (and works) in practice



**Qualitative interview study: 34 participants**

Interviews in 2020 with frontline staff (n= 13) and leadership (n=7) in debt collection, and people with mental health problems and debt (n=14).

**Quantitative survey: 5000 participants**

Money and Mental Health instructed Opinium in 2021 to ask 5,001 adults (18-65) who had experienced mental health problems about their lives.

# Guide 1

encouraging: disclosure environments

barriers to disclosure | pathways to disclosure

Fear of financial harm | Lack of opportunities | Damage from data  
Anticipation of judgement, disbelief and pity | Not worth it

Support strategies | Onboarding | Routine contact  
Humanity and transparency | One consumer, multiple firms



# Guide 1

disclosure environments

## barriers to disclosure

### **Only a minority disclose**

11% - water sector

12% - energy sector

13% - telecoms sector

14% - financial services

### **Fear of harm**

*“You don’t know whether... [firms are] gonna freak out and say, ‘Oh yeah, we don’t want to deal with this,’ and ...close all my accounts.”*

### **Not worth it**

*“they’re not interested in little people...and I just thought, ‘Well, do I want to...go through that and then find out nothing’s happened?’”*

# Guide 1

disclosure environments

pathways to disclosure

## **Some firms are acting**

Barclaycard

Lloyds Banking Group

Phoenix Group and Cowry

## **Support and signals**

*“if you go to their website...  
look at sort of financial  
problems, they had lots of  
different case studies[on]  
how they can support”.*

[lived experience  
interviewee]

## **Opportunities for disclosure**

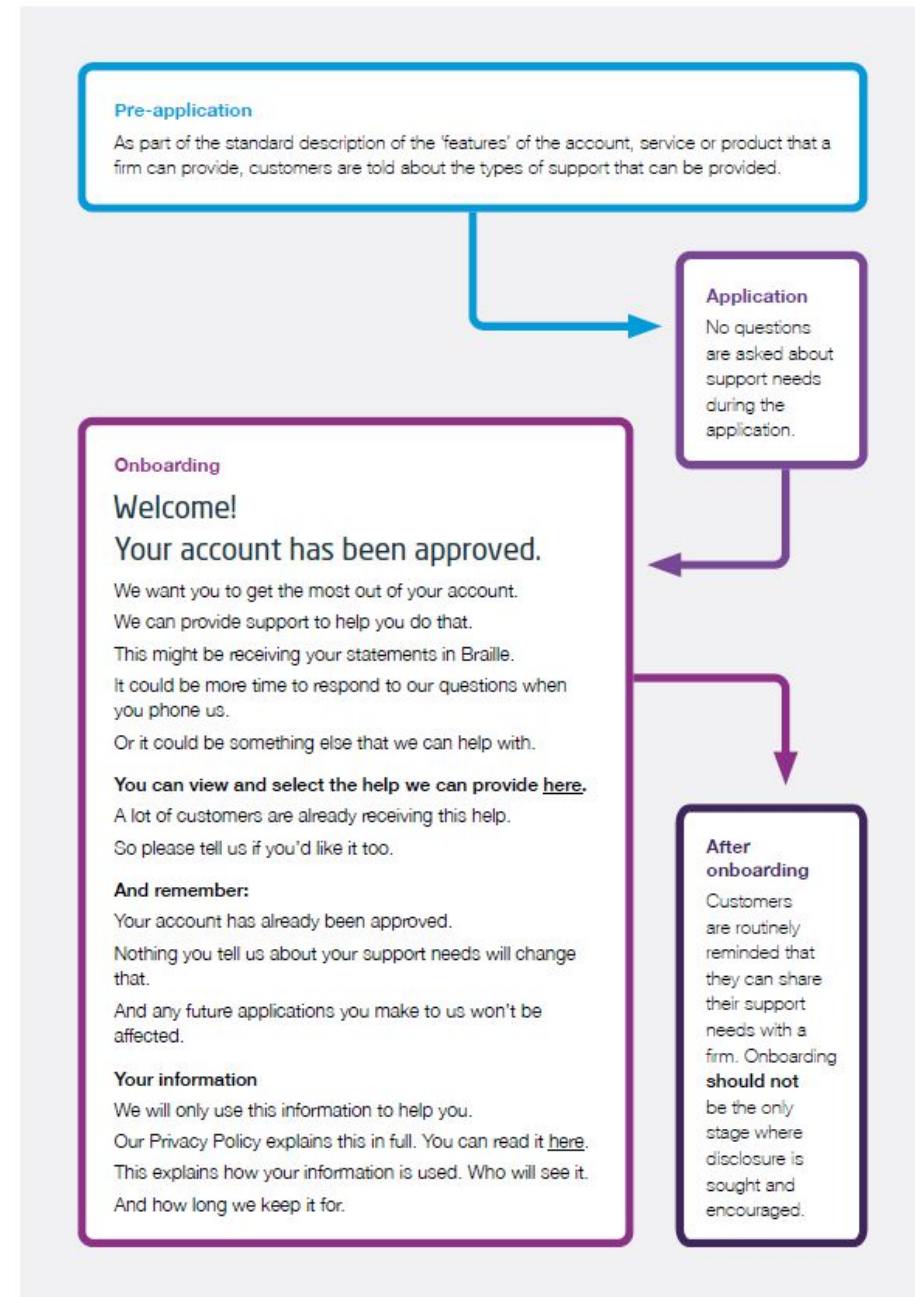
The earlier that firms know  
about consumer support  
needs – from onboarding  
onwards - the sooner they  
can meet them.

# Guide 1

## disclosure environments

## pathways to disclosure

Figure 1: Onboarding – building in a disclosure moment

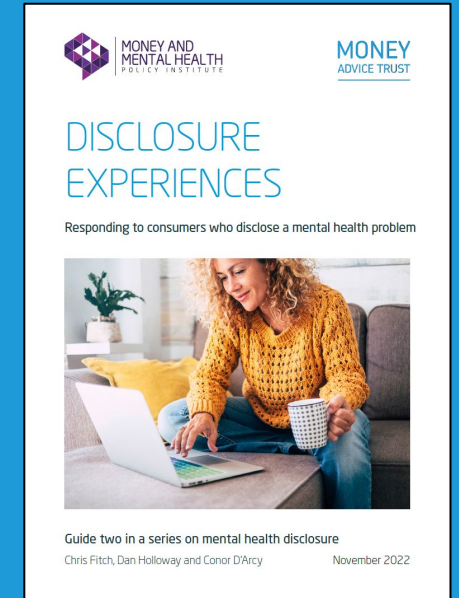


# Guide 2

## responding: disclosure experiences

### what makes for a 'good' disclosure?

Action and transparency | Accuracy and relevancy | Connection and reassurance  
Recognition and difference | Choice and control | Guiderrails and culture



## Guide 2

disclosure experiences

### what makes for a 'good disclosure'?

#### **Tools alone, are not enough**

*"[They] provide a framework ... a mental tick list..."*

*"At some point you've got to take the... stabilisers off the bike... you will always have something that doesn't fit."*

#### **Action**

*"[Disclosure meant] I'm not hav[ing] the phone calls all the time or having the letters through in the post. Now I've... told them, all that has stopped."*

#### **Connection**

*"you feel they're just rattling through. You... can almost see... those questions are coming up on the screen and they're following a patter..."*

## Guide 2

disclosure experiences

what makes for a good disclosure?

**Some firms are acting**

Capital One

Monzo

**Accidental**

**Probed**

**Bundled**

**Life stories**

**Repeated**

**Cautious**

**Third-party**

**Withdrawn**

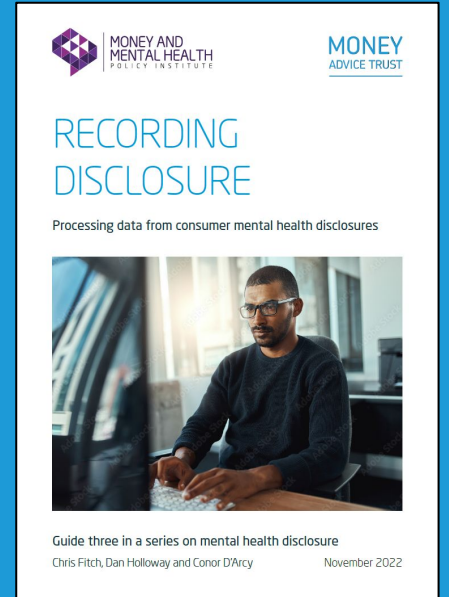
# Guide 3

recording: processing disclosures

## what do consumers think about data recording?

No explanation or choice | Explanation no choice

Explanation and choice | Explanation and opportunity to object



## Guide 3

### processing disclosures

## what do consumers think about data recording?

#### **Consumer voice overlooked**

Data protection debates can be complex, technical, and focused on what is possible for a firm to record. What consumers want recorded is arguably overlooked.

#### **Choice and control**

*“It’s my data, my information and it’s my choice if I want to share it with that company”*

#### **Choice not offered**

*“I contacted [firm] and they ... didn’t ask for my consent, but... they’d said, ‘Yeah, we can see that you’re going through this’.*

## Guide 3

### processing disclosures

## what do consumers think about data recording?

#### **Consumer voice overlooked**

Data protection debates can be complex, technical, and focused on what is possible for a firm to record. What consumers want recorded is arguably overlooked.

#### **Choice and control**

*“It’s my data, my information and it’s my choice if I want to share it with that company”*

#### **Choice not offered**

*“Being reminded of the situation that you are in... then knowing this...stranger has access... when you’ve not given consent to the company to keep it... there are untold consequences...”*

## Guide 3

### processing disclosures

## what do consumers think about data recording?

#### **Explanation no choice**

*"I wouldn't be happy at all and I'd take the matter further, definitely. Well, they should ask permission first, really, shouldn't they, 'cos it's, it's something very sensitive".*

#### **Explanation and choice**

*"should be asking for your explicit consent... you might be happy telling the person that you're speaking to, about... whatever's going on, but you might not be happy to know that's on your file"*

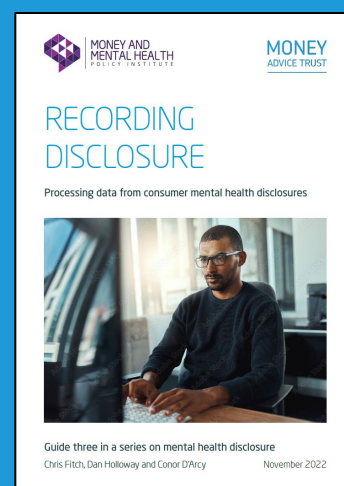
#### **Explanation and objection**

*"I'd feel undermined. I'd say I'm intelligent enough to know what's in the best interests for me... it's down to me whether I want you to record that information or not."*

# Disclosure

/dɪsˈkləʊʒə/ noun

Disclosure is a central pillar of any vulnerability strategy – but we need to better unpack what happens and what works with the voice and experience of consumers at the centre of this



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