



Dementia-friendly financial services

A charter for improving the customer experience of people living with dementia when dealing with financial service organisations

Contents

Foreword	2
Dementia-friendly financial services charter	4
Expectations for a dementia-friendly financial services sector	6
Guidance on the commitments in the charter	14
Acknowledgements	31

Foreword



People living with dementia tell us that one of the biggest challenges they face is dealing with banks, building societies and insurance companies.

Access to financial services is a fundamental aspect of life that most of us take for granted but one that is fraught with difficulties when one develops dementia. From our own research we know:

- When using a bank, 66 per cent of people with dementia need some assistance.
- Difficulties were experienced by 76 per cent of people with dementia when using a bank.
- When paying bills, 70 per cent of people with dementia need assistance.
- Of the carers we asked, 80 per cent said that banks need a greater understanding of lasting powers of attorney.
- 84 per cent of carers help people with dementia deal with the bank.
- Without a recognised power of attorney, carers reported that banks and utility companies refused to deal with them.

While legislation and industry guidelines provide a foundation for serving customers with dementia (and their carers) the reality is that the quality of a customer's experience will vary between financial service organisations, exacerbated by the fact that most people will have multiple products with multiple financial service organisations.

However, we recognise that financial service organisations also face significant challenges when dealing with customers who have dementia, walking a tightrope between what they must do under the law, what they should do according to industry guidance and what they would like to do in order to meet a customer's specific personal needs.

For these reasons we are delighted to have worked with representatives across the financial services industry to create this charter on dementia-friendly financial services. Thank you to Lloyds Banking Group for chairing the group and to all those who participated.

Our goal is to help create improved consistency between financial service organisations in recognising dementia, understanding how dementia can impact customers and by showing them how to respond to customers in a way that treats them with respect and helps them retain their dignity and as much independence as possible.



Jeremy Hughes
Chief Executive, Alzheimer's Society



As the banking sector representative on the Dementia-Friendly Communities Champions Group, Lloyds Banking Group is pleased to have led the creation of this charter and is committed to meeting its goals.



António Horta-Osório
Group Chief Executive, Lloyds Banking Group



Dementia-friendly financial services charter

Organisations signing up to the Dementia-friendly financial services charter will meet the following commitments.

Recognise

- Recognising that dementia is a growing societal challenge, organisations will appoint a senior level Dementia Champion.
- The Dementia Champion will raise the benefits and promote the importance of working towards becoming a more dementia-friendly organisation.
- Organisations will commit to delivering basic awareness training about dementia to all relevant staff so they are better able to recognise and act on the signs and symptoms of dementia.
- Organisations will identify the needs of customers with dementia and create a culture where customers feel comfortable discussing their needs with us.

Understand

- Organisations will commit to delivering more in-depth training to specialist staff working, for example, in vulnerable customer, risk, financial crime, complaints and legal teams so they understand the impact of dementia.
 - Organisations will develop practical and consistent guidance for front line staff so they can better support people affected by dementia.
 - Organisations will ensure that staff are aware of their duties and responsibilities with respect to relevant legislation and industry standards, for example the Mental Capacity Act 2005.
-

Respond

- Organisations will make it easy for people affected by dementia to tell them and discuss their specific customer service needs.
 - Organisations will work towards ensuring that communication and service needs can be recorded so that they can do their best to ensure that future service is tailored appropriately.
 - Organisations will ensure that where a product is not suitable due to the impact of dementia, their staff can confidently explain why and provide any relevant information on how and where help may be available.
 - Organisations will commit to an on-going consideration of the needs of people affected by dementia when amending or developing their business processes, procedures and products.
 - Organisations will support the carers of customers living with dementia by providing fair, appropriate and consistent standards of practice within the legal frameworks that acknowledge the rights and responsibilities of third party representatives in the UK.
 - Organisations commit to working in partnership with other relevant organisations and appropriate agencies to ensure that they develop and follow best practice when dealing with vulnerable customers, including reporting incidents of suspected financial abuse/harm.
 - Organisations will help and encourage their product, service and supply partners to assess their products and services where appropriate to ensure they support people affected by dementia.
 - Organisations will promote dementia-friendly practices within the financial services industry to help the industry deliver its dementia-friendly commitments.
 - Organisations will support staff who wish to take part in Dementia-friendly and other community initiatives.
-

Expectations for a dementia-friendly financial services sector

1. Why a charter on dementia?

The financial services sector has worked with Alzheimer's Society to develop a Dementia-friendly financial services charter designed to enable the sector to work towards becoming 'dementia-friendly'.

With such a broad spectrum of disabilities and medical conditions that can impact people's lives, there may be a question over why the sector is focusing on dementia. This specific focus is because:

- The Prime Minister's call to the nation for the UK to become the leaders in understanding and dealing with dementia has opened the door for financial providers to work together to tackle the issues that they and our customers face daily.
- The barriers and impact of dementia are so broad that the learning and progress made under the dementia umbrella will simultaneously tackle a number of barriers associated with a wide range of mental capacity issues and provide a framework to address other types of disability or vulnerability in the future.

We do not expect the financial services sector to develop or sign up to a charter for every single condition that exists and we envisage that in fullness of time the content of this dementia charter will form the framework for a more general 'mental capacity-friendly' charter and ultimately a 'disability-friendly' charter.

In order for the charter to be successful and for financial institutions to feel confident to sign up, there needs to be clarity around the expectations of the extent to which the industry can help. Here we acknowledge that the factors below will impact on if and how we can provide the necessary support:

- that not all people who have dementia want to disclose it
 - that not all people who are showing potential signs of dementia will have a diagnosis
 - that there are practical restraints that will reduce the opportunity to both identify the signs of dementia and to make changes that will help
 - that there are legal constraints and codes within which the industry must operate, and
 - the industry has an over-riding purpose to protect customers, particularly those who are most vulnerable, from financial abuse and crime.
-

2. Expectations of the charter

Signing up to the dementia-friendly charter is a commitment to understand the barriers within our industry that are faced by people who have dementia and their carers, and take action to remove those barriers where it is possible and appropriate to do so.

The charter does not mean that your organisation will be expected to:

- make a diagnosis of dementia about customers**
- identify every customer who has dementia**
- ask customers difficult and intrusive questions**
- breach existing legislation such as the Data Protection Act 1998 and the Mental Capacity Act 2005**
- ignore fraud prevention measures**
- go beyond normal terms and conditions to sell a product or service that puts the organisation or customer at risk**
- be “dementia-friendly” on day one after signing the charter**

The charter does mean that your organisation will be expected to:

- understand the impact of dementia and how it changes customer needs**
- identify potential signs of dementia where it should reasonably be expected to do so**
- understand the caveats within legislation that may allow a usually prohibited action to be taken, and to challenge relevant bodies where such caveats do not exist**
- practically consider how processes and services can help customers affected by dementia**
- work towards meeting all the commitments in the charter and in doing so become ‘dementia-friendly’**

A number of individual circumstances and factors will impact the ability to identify that a customer may have dementia or to take steps to help. Some of these factors are listed on the next page. This list is not exhaustive.

3. Customer disclosure

A customer's willingness to disclose that they have dementia will significantly impact the steps that can be taken to help them access and responsibly manage their finances.

For example:

Customer A

Tells his financial services providers that he has dementia, and would like steps to be taken to make sure that this, and the additional help he requires as a result, is recorded for all staff members to see.

Customer B

Tells a member of staff that he has dementia but does not want this recorded anywhere.

Customer C

Does not disclose that they have dementia.

The table below contains examples of the types of help financial services could offer and whether or not this could be offered to example customers A, B or C.

Examples of potential help available	Customer		
	A	B	C
Visible to all staff that it may not be appropriate to sell certain products	✓	✗	✗
Provide alternative security methods to PINs and passwords	✓	✗	✗
Offer products and services specifically suitable for customers who have dementia and their carers	✓	Limited to 1 member of staff	✗
Reduce possibility of inappropriate actions, for example unnecessary withdrawals or amendments to policy	✓	Limited to 1 member of staff	✗
Be more alert to the possibility of financial abuse or crime from a third party	✓	Limited to 1 member of staff	✗

This clearly illustrates that a customer's willingness to disclose that they have dementia impacts on the level and type of help that can be offered by the financial services sector. It also highlights that there is a risk of inconsistent service which can occur when the customer only informs a single member of staff – as well as placing what might be considered a burden of responsibility on to that single member of staff.

Significantly, there are times that financial service providers may have to ask customers about health or medical conditions, for example, when applying for insurance in line with the Consumer Insurance Act 2012. Non-disclosure of a condition like dementia may have serious consequences, such as invalidating the insurance policy as the customer was not honest with the provider.

Likewise financial service organisations must be aware of the provisions of the Data Protection Act 1998 and other legislation relating to the recording of sensitive information such as health conditions. Recording the customer's needs in relation to their dementia (for example the need to conduct business in a quiet area, the need for alternative security questions) is acceptable, recording the specific nature of the customer's condition without their prior consent is not.

The impact of customer disclosure or non-disclosure is recognised and acknowledged both across the industry and by dementia bodies. The hope is that action taken under the dementia-friendly charter will encourage customers who have dementia to disclose it.

3.1 Diagnosis and legislation

Where there is cause for concern that a customer may have dementia, or a similar condition that could limit the customer's mental capacity, but no diagnosis has been given (or disclosed), it is unclear what action a financial services provider **can legally**, and **should dutifully**, take.

This uncertainty is split into two parts:

a) What action can and should be taken where potential signs of dementia have been identified by the financial services provider?

Who can we ask/tell?

What can we say?

What do we do in the meantime?

Should we allow transactions that we have concerns about?

b) What action can and should be taken where, despite having made attempts to establish whether the customer has the capacity to make financial decisions, no diagnosis has been given (or disclosed), but the customer continues to behave in a way, and/or make decisions, that cause concern?

When do we draw a line under our enquiries?

Do we now treat aggressive behaviour as unacceptable?

Do we ignore our ongoing concerns?

However, it remains understood that financial service providers must act within legal restrictions such as the Data Protection Act 1998 and the Consumer Insurance Act 2012 when it comes to establishing if a condition exists and must presume mental capacity, as per the Mental Capacity Act 2005, if no diagnosis exists or no diagnosis is forthcoming, despite attempts to establish this.

It is also understood that a diagnosis of dementia does not automatically mean lack of mental capacity nor can lack of capacity be assumed.

3.2 Opportunity to identify potential signs

It is an essential part of the charter that training will be developed and delivered to educate front line staff on how to identify potential signs of dementia (or similar conditions) to ensure that appropriate action is taken and help is offered.

However, the opportunity to identify potential signs of dementia will be impacted and limited by some practical factors.

For example:

Face-to-face

Large city branch



- less likely to see same customer regularly
- reduced amount of time to spend with customer

therefore

- less opportunity to identify changing or odd behaviour
- less opportunity to identify unusual transaction requests.

Small rural branch



- more likely to see same customer regularly

therefore

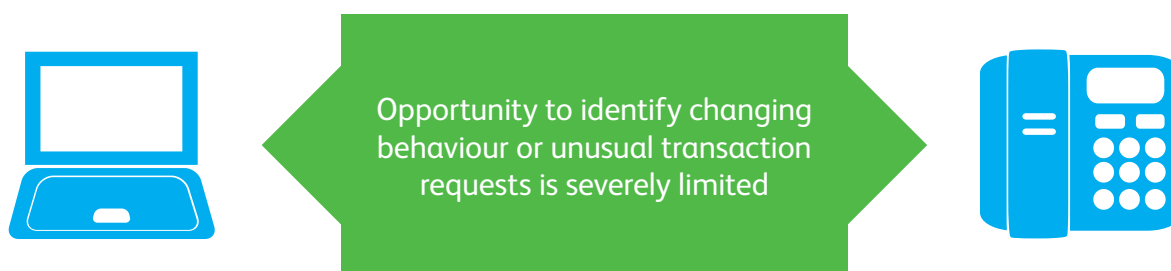
- more likely to identify changing or odd behaviour
- more likely to identify unusual transaction requests.

These limitations are recognised across the sector and by organisations and charities supporting people with dementia and their carers. Taking a similar approach to the same concerns raised by the Office for Fair Trading's Mental Capacity – OFT guidance for creditors¹, staff members can only be expected to identify potential signs of dementia where it is deemed reasonable to do so.

For instance, a customer withdrew £500 on three occasions within one week from their local branch – an unusual occurrence and not in keeping with their usual transactional behaviour. It later transpired they had dementia and were giving this money away to passers by on the high street, a loss of £1,500.

If the customer's branch was the small rural branch, it is more reasonable to expect that they may have recognised this unusual behaviour than if the customer's branch was the large city branch.

Remote channels



Many financial services and products are purchased and managed over the telephone or online which brings specific challenges when it comes to recognising and acting upon potential signs of dementia.

Firstly it is highly unlikely that customers will be routed through to the same customer adviser more than once, so the opportunity for a customer adviser to remember an individual customer (and their personal situation or patterns of behaviour) is equally unlikely.

Secondly telephone and online channels are anonymous in the fact there is no face-to-face interaction so non-verbal cues can be lost or not picked up.

However, the anonymity of a phone conversation or online session might make it easier for someone to disclose they have dementia without the potential embarrassment of revealing it to someone sat in front of them.

¹ www.offt.gov.uk/shared_offt/consultations/oft1373.pdf

3.3 Fraud prevention

A large number of fraud prevention methods in place across the industry require the customer to remember information known only to them, such as PINs, passwords and security questions based on their own financial or personal information.

For a customer who has dementia, but is still able to make informed financial decisions, this creates a significant barrier in enabling access to their funds and account information.

Fraud prevention methods can also make life difficult for carers and attorneys trying to manage money on the customer's behalf, at what is already a very difficult and stressful time for them.

There is no question that **fraud prevention remains critical**.

The charter does not require that fraud prevention methods are removed. Instead, it commits to exploring alternative fraud prevention methods that may allow access while still providing security.

This is understood and recognised across the sector and by organisations and charities supporting people with dementia and their carers.

4. Summary

Working within these parameters, great steps can be taken to improve the customer experience for people who have dementia and their carers when dealing with the financial sector, including:

- training and education
- improved and consistent processes and procedures
- guidelines for specific circumstances
- exploration of alternative security measures
- development of specific products and services

It is understood and recognised across the sector and by organisations and charities supporting people with dementia and their carers that the parameters described above exist and that work undertaken must remain within them.

However, it is also clear that as work progresses, the parameters may change and allow greater scope for the development of a dementia-friendly sector.

Guidance on the commitments in the charter

The following section provides guidance on the commitments in the charter to help organisations understand the rationale behind them and how to meet them.

Each point in the charter is expanded to provide the following information:

Rationale: why the commitment was included in the charter and what it is trying to achieve.

Guidance: information, advice and recommendations to help an organisation comply with the commitment.

How to demonstrate compliance: *suggested* ways in which an organisation could demonstrate that it is complying with the commitment.

Level of difficulty: we recognise some commitments in the charter are going to be harder to achieve than others, consequently each commitment has been given a difficulty rating based on the complexity of the commitment and the likely length of time an organisation might take to meet the commitment.

Green

Straightforward

Amber

Some complexity

Red

Complex

Timeframes will be dependent on the size and nature of the organisation. We expect the Dementia Champion to determine the timeframe within their organisation and set goals as part of their overall commitment in signing up to the charter.

Note: unless stated otherwise, the term 'people affected by dementia' includes those with the condition and those caring for them.

Recognise

Recognising that dementia is a growing societal challenge, organisations will appoint a senior level Dementia Champion.

Rationale: Senior colleagues, such as a CEO, set the moral compass of their organisation which in turn affects its culture and behaviours. Becoming a 'dementia-friendly' organisation is a cultural and behavioural change; consequently getting a senior colleague 'on board' is a critical first step on that journey.

Guidance: The person appointed 'champion' will depend on the size and nature of an organisation. The CEO or Managing Director, sitting at the head of the organisation, is a logical candidate but there may be other senior stakeholders who are more appropriate, for example a senior colleague who is already accountable for a range of disabled or vulnerable customer issues which will include dementia.

It is recommended that the champion balances seniority with day-to-day involvement in the organisation and should not be too far removed from the front line and the customer facing side of the business.

The champion will also probably connect with other internal stakeholders, such as the organisation's Corporate Social Responsibility team, to support execution of the commitments in the charter.

How to demonstrate compliance: The champion's name should be made known internally to all members of staff, for example via the organisation's intranet, and confirmed with Alzheimer's Society (usually as part of signing up to the charter).

The champion should provide a status report to the organisation's board of directors or similar body on progress in meeting the charter.

Level of difficulty: Green. We note, however, that smaller organisations may find assigning this post more challenging.

The Dementia Champion will raise the benefits and promote the importance of working towards becoming a more dementia-friendly organisation.

Rationale: Competing business priorities mean that change initiatives cannot be driven forward solely on the basis of societal or charitable benefit. Instead they must be rooted in something that will demonstrate benefits to the business per se, for example increased customer or shareholder value.

Guidance: The nature of the business benefits will depend on the nature of the organisation and where it is on its 'dementia journey'.

We do not anticipate this being a rigid model, but the factors to consider include:

- proportion of customers likely to be affected by dementia (including carers)
- the spending power of those customers
- the risk of those customers and their families/carers taking their business elsewhere
- the risk of reputational or legal damage arising from poor customer experience.

It is important to note that delivering improved services for people affected by dementia will additionally benefit those with other mental capacity issues and, ultimately, people with alternative and additional needs in general. So becoming dementia-friendly will actually benefit a far wider range of customers than those with dementia and will contribute to an organisation's customer treatment strategy.

How to demonstrate compliance: The commitment to the charter should form part of the information on the organisation's Intranet or similar about their approach to becoming dementia-friendly, e.g. alongside the name of their dementia champion.

Level of difficulty: Green. With a Dementia Champion in place, this task should be straightforward, with assistance where necessary from Alzheimer's Society.

Organisations will commit to delivering basic awareness training about dementia to all relevant staff so they are better able to recognise and act on the signs and symptoms of dementia.

Rationale: The ability for members of staff to recognise the signs of dementia is a fundamental step in becoming dementia-friendly.

Guidance: By 'basic' awareness training we mean equipping members of staff with:

- an appreciation of how prevalent dementia is in society (for example it affects one in 3 people over 65)
- an understanding of how it impacts those affected in their dealings with financial service organisations (by reading personal stories, case studies)
- the ability to recognise the potential signs of dementia
- knowledge of where to go for help, advice and support (we expect this to leverage existing procedures and internal resources).

By 'relevant staff' we mean those dealing with customers on the front line as well as potentially those in the back office not directly involved with serving customers. To help set the scope we suggest that organisations consider which members of staff are involved in delivering the customer experience and deliver the training to them.

We recognise that in most financial service organisations members of staff will have packed training schedules with competing priorities (both regulatory and mandatory training). Delivering dedicated basic dementia awareness training is an ideal, but if this is not practical then it could be combined with other relevant training. The key thing is to meet the objectives laid out above.

We also recognise that in most large organisations there is a degree of staff turn over as members of staff leave and are replaced. We recommend that organisations consider how to provide basic awareness training on an on-going basis, for example as part of the induction or annual refresher training.

Alzheimer's Society is happy to assist with the development of basic awareness training or give advice on suitable providers. You can also encourage your staff to volunteer to become a Dementia Friend Champion².

How to demonstrate compliance: Training either dedicated to or incorporating basic dementia awareness should form part of the organisation's training curriculum, along with a schedule or approach to rollout, for example a 'big bang' for all members of staff and/or 'business as usual' as part of established training regimes.

Level of difficulty: **Amber** or **Red**. The level of difficulty will depend on organisation size and state of readiness, for example whether training materials need to be developed. We expect most organisations to be Amber or Red.

² www.dementiafriends.org.uk

Organisations will identify the needs of customers with dementia and create a culture where customers feel comfortable discussing their needs with us.

Rationale: To be truly 'dementia-friendly' an organisation must understand the needs of people affected by dementia in the context of their business and they cannot get this understanding unless people affected by dementia feel comfortable telling them.

Guidance: There is no single way of meeting this point and the methods used will vary depending upon the size and nature of the organisation. Possible methods include:

- leveraging existing feedback mechanisms (for example customer focus groups, customer complaints data, feedback forms) to understand how customers with dementia are feeling and how you are treating them.
- engaging with dementia advocacy groups (for example Alzheimer's Society or local Dementia Action Alliances) to get an understanding of the challenges that people affected by dementia face.
- publicising on the company website and other materials the fact that your organisation is listening and wants feedback from customers.

How to demonstrate compliance: Being able to cite examples of where external feedback has been obtained from people affected by dementia or appropriate advocacy groups.

Level of difficulty: Green. As a minimum most if not all customer facing organisations have existing mechanisms for obtaining customer feedback, so meeting this point should be a matter of adapting existing mechanisms rather than introducing something new.

Understand

Organisations will commit to delivering more in-depth training to specialist staff working, for example, in vulnerable customer, risk, financial crime, complaints and legal teams so they understand the impact of dementia.

Rationale: Some members of staff will need to go beyond the basics in their understanding of dementia in order to ensure that they – and their organisation – respond in an appropriate manner to customers affected by dementia.

Guidance: By ‘in-depth’ we mean going beyond the basic recognition of the signs of dementia and gaining a deeper understanding of the impact of dementia in relation to financial services, for example:

- how dementia can result in behaviour that leads to the customer getting into financial difficulties
- the needs of carers or third parties and the challenges they can face
- spotting irregular behaviours that might indicate that a customer has dementia, such as repeated withdrawals
- dealing with difficult customer situations that might arise as a result of dementia, for example apparently aggressive or abusive behaviour.

Specialist training can be provided by organisations such as Alzheimer’s Society and others working in the field of dementia³.

Such training could be used to create local ‘champions’ in branches or call centres who could then assist customers in person or provide support to other members of staff.

As with the basic awareness training we encourage organisations to think about how the in-depth training can be made ‘business as usual’ to counter staff churn and ensure that knowledge stays refreshed.

How to demonstrate compliance: Training either dedicated to or incorporating an in-depth understanding of dementia should form part of the organisation’s training curriculum, along with a schedule or approach to rollout, for example a ‘big bang’ for all members of staff and/or ‘business as usual’ as part of established training regimes.

Level of difficulty: **Red** or **Amber**. We recognise that delivering this more in-depth training will be more challenging than the basic training due to the need to develop the material and hence the length of time taken to implement it.

³ <http://www.alzheimers.org.uk/site/scripts/documents.php?categoryID=200307>

Organisations will develop practical and consistent guidance for front line staff so they can better support people affected by dementia.

Rationale: Training will build awareness and confidence, but once back on the front line members of staff will need access to guidance that will help them deal with real-life customer situations while clarifying the legal and regulatory requirements that they have to follow. Providing such guidance will also improve consistency in customer experience across an organisation, for example, in all call centres and branches.

Guidance: We anticipate that organisations will already have some guidance in place in their retail or other procedures, hence it will be a matter of augmenting these and, critically, ensuring that members of staff know where and how to find the guidance.

There are materials available that can be used to augment or create practical guidelines:

- Direct Marketing Association – White paper on call centres dealing with vulnerable customers⁴
- Business Disability Forum – ‘Your call is important to us’⁵
- Alzheimer’s Society – Factsheets on communication⁶

There are a number of health conditions and disabilities that can result in mental incapacity and vulnerability. Consequently the guidance required to meet this point does not necessarily have to be stand alone and can be part of other existing material.

The guidance should include dealing with carers and other third parties.

We encourage financial service organisations to work with their respective industry bodies in developing this guidance so that we can create consistency in guidance across the financial services industry as a whole.

How to demonstrate compliance: Front line members of staff should be able to quickly find (while a customer is on the phone or in front of them in branch) the operational or procedural guidelines relating to dementia.

Level of difficulty: Amber. We understand that in a large organisation distributing the guidance to all relevant staff and achieving consistency might be a challenge, along with the timeframe for developing the guidance.

⁴ <http://dma.org.uk/toolkit/white-paper-guidelines-call-centres-dealing-vulnerable-consumers>

⁵ <http://businessdisabilityforum.org.uk/our-offer/advice/publications/your-call-important-to-us>

⁶ http://www.alzheimers.org.uk/site/scripts/documents_info.php?documentID=130

Organisations will ensure that staff are aware of their duties and responsibilities with respect to relevant legislation and industry standards, for example the Mental Capacity Act 2005.

Rationale: Understanding of dementia does not sit in isolation but is linked to a number of other legal and regulatory frameworks, all of which must be understood by appropriate staff in order to deliver a correct and consistent customer experience to people affected by dementia.

Guidance: By staff here we mean those serving customers on the front line or involved in back-office support roles, for example customer complaints, product development, training.

By 'awareness' we mean a basic understanding of legal and regulatory frameworks which will help ensure compliance and, more importantly, knowing where to go for more detailed information when needed. We are not suggesting or expecting that all non-legal members of staff become legal experts.

We recommend that organisations consult their internal legal and compliance teams for advice on meeting this point. However, as an initial starting point we would anticipate staff having an awareness of the following:

- Mental Capacity Act 2005 and mental capacity in general⁷
- Relevant clauses in the Consumer Insurance Act 2012 relating to mental capacity and obtaining information from policy holders⁸
- Mental Capacity – OFT guidance for creditors⁹
- Provisions such as powers of attorney and other third party representation frameworks¹⁰
- Relevant industry guidance such as the BBA¹¹ and BSA third party authorisation framework

Note that organisations operating outside England and Wales may need to be cognisant of different jurisdictions in parts of the UK.

How to demonstrate compliance: Training materials and other guidance should be available on the organisation's intranet or similar communication channel. The organisation should be able to demonstrate how knowledge will be maintained, for example annual refresher training or similar.

Level of difficulty: Amber. We understand that in a large organisation distributing the guidance to all relevant staff and achieving consistency might be a challenge, along with the timeframe for developing the necessary information or training material.

⁷ www.alzheimers.org.uk/site/scripts/documents_info.php?documentID=354

⁸ www.legislation.gov.uk/ukpga/2012/6/contents/enacted

⁹ www.ofc.org.uk/shared_ofc_consultations/ofc1373.pdf

¹⁰ www.alzheimers.org.uk/site/scripts/documents_info.php?documentID=154

¹¹ www.bba.org.uk/publications/entry/guidance-for-people-wanting-to-manage-a-bank-account-for-someone-else/leaflets/

Respond

Organisations will make it easy for people affected by dementia to tell them and discuss their specific customer service needs.

Rationale: Previous commitments in the charter on the topic of understanding ‘needs’ have been at a ‘class’ level. This point ensures that the organisation has the ability to capture and understand individual customers’ needs and hence serve them in an appropriate manner that meets those specific needs.

Guidance: This situation is one where the customer knows and accepts they have dementia and would be willing to share that information with the organisation. This is dependent on two factors:

- The individual customer’s awareness that they have dementia and/or their willingness to disclose
- The organisation creating a culture where the customer feels comfortable in disclosing

Organisations per se are limited in what they can do in relation to the first factor although the second factor will help (and previous commitments in the charter will assist in that).

By ‘easy’ we mean that the disclosure of dementia and discussion of the customer needs should be an integral part of the way in which the organisation deals with customers, for example part of the standard policy or account opening procedure, part of regular customer service. The onus is on the organisation to convey to the customer that they want to know their needs in order to deliver a great service.

It’s important to emphasise that we expect organisations to capture the customer’s needs and not their impairment or disability.

Meeting this point will ensure that organisations fulfil requirements under the Mental Capacity Act 2005 to offer support to people with dementia to make their own decisions (principle 2) – for example offering information in different formats: verbal, written, easy read, large print etc. It could also mean contacting people at a time that is best for them, for example morning as opposed to afternoon, or accepting that someone may need to put off decision making until another time.

We do not see this as being a dementia specific point, it is part of the overall customer experience and therefore should already be in place as part of an organisation’s general customer treatment strategy.

Returning to the customer’s willingness to share that they have dementia, we recognise the importance of initiatives outside the financial services sector on this point. Campaigns such as Dementia Friends and Dementia-friendly Communities¹² will help raise awareness, ‘normalise’ dementia in society and in turn help customers feel more confident about disclosure.

How to demonstrate compliance: Capture and discussion of customer needs is built into regular customer touch points, for example in policy, on account opening, and in on-going relationship management, etc.

Level of difficulty: **Green** or **Amber**. The difficulty will depend upon measures that need to be put in place, but we expect most organisations to meet this point relatively easily because it is part of overall customer experience management.

¹² www.alzheimers.org.uk/site/scripts/documents.php?categoryID=200436

We will work towards ensuring that communication and service needs can be recorded so that we can do our best to ensure that future service is tailored appropriately.

Rationale: The previous point ensures that the customer has the opportunity to cite their needs; this point ensures that those needs are stored in an appropriate manner for future use and that services are tailored accordingly.

Guidance: The principle of this point is that organisations should always respond in the way the customer needs once their needs have been logged (and, as above, will help to meet principle 2 in the Mental Capacity Act 2005).

In this respect this point is just about good customer service and should apply to both the person who has dementia as well as their carer or attorney.

However, we recognise three challenges with meeting this point:

- A common situation is that a customer's family or relatives request the recording of needs, for example, 'could you just make a note on my Dad's record that...'. Consequently there are considerations around data protection and privacy
- Not all organisations have the necessary IT capability to record customer needs or needs beyond the disability basics, for example alternative format materials
- The customer's right to ask that disclosure of their dementia is not recorded or further disclosed within the organisation must be accepted and acted on.

Meeting this commitment will be assisted in the future by the Office of the Public Guardian's online Register of Attorneys, meanwhile Alzheimer's Society is working with the UK Government on clarifying data protection and sharing regulations that will help financial service organisations meet this point. In lieu of that we would expect financial service organisations to work towards the logging of customer needs raised by the customers themselves.

How to demonstrate compliance: Through the ability for a customer to request a service need and for that need to be fulfilled in the future without repeat requests.

Level of difficulty: Red. As indicated above, we expect this point to be one of the more difficult to meet due to challenges of adapting IT systems to capture and process service needs.

Organisations will ensure that where a product is not suitable due to the impact of dementia, their staff can confidently explain why and provide any relevant information on how and where help may be available.

Rationale: In some situations an organisation will not be able to sell a product or service to a person affected by dementia due to terms and conditions or other constraints, for example the law. This point will help ensure a positive customer experience in what could be a negative situation.

Guidance: Meeting this point is dependent on the previous ones around dementia awareness and understanding. In addition customer facing staff must have a clear understanding of the terms and conditions of their products and services, relevant legislation or other frameworks and how dementia might impinge on these.

By 'confidently' we mean that the member of staff understands and can explain a product or service terms of conditions, has knowledge of alternative products or services and is comfortable communicating with people affected by dementia (for example through their language, terminology and behaviour).

By 'provide relevant information' we mean be able to point the customer – or the family member or relative – in the direction of other sources of advice or, possibly, alternative products that might meet their needs.

How to demonstrate compliance: Guidance or procedures are available to customer facing staff on how to deal with situations where they are unable to sell a product or service to someone with dementia and the guidance includes other sources of information and help.

Level of difficulty: Amber. We expect organisations to already have the necessary information available; it is more a matter of pulling it together and providing necessary instruction to front line staff to make use of it when dealing with a customer affected by dementia.

Organisations will commit to an on-going consideration of the needs of people affected by dementia when amending or developing their business processes, procedures and products.

Rationale: We are keen to encourage organisations not to think of becoming dementia-friendly as a one-off, 'box ticking' exercise, hence we want organisations to consider how they can ensure on-going commitment to meeting the needs of people affected by dementia.

Guidance: We do not anticipate organisations having to create new processes or procedures to meet this point, instead we would suggest adapting existing processes.

For example, as part of an existing product or service introduction process an organisation could include some additional checks to ensure that people with dementia are not going to be inadvertently impacted. This is probably already happening with other demographics, for example people with disabilities, people without English as a first language, etc. so it's just a matter of thinking slightly more broadly.

Also note that we are seeking commitment on consideration and review rather than remediation; we accept that legacy products, services, systems etc. might well not meet the needs of people affected by dementia but it is hard to create the business case to make what could be expensive modifications.

As with other commitments in this charter this one reflects best practice in customer experience and not just for people affected by dementia.

How to demonstrate compliance: Specific measures are present in organisational governance to ensure that the needs of people affected by dementia are considered in business change programmes.

Level of difficulty: Green. We anticipate that organisations will be able to adapt existing governance frameworks to meet this point rather than create something new.

Organisations will support the carers of customers living with dementia by providing fair, appropriate and consistent standards of practice within the legal frameworks that acknowledge the rights and responsibilities of third party representatives in the UK.**

Rationale: Many people affected by dementia rely on other people to help manage their financial affairs so lack of support for carers will mean that organisations are not helping those customers.

Guidance: ‘A framework for authorising people wanting to operate a bank account for someone else – guidance for banks and building societies’ – was published in 2012 by BBA¹³, BSA, The Law Society of England and Wales, Solicitors for the Elderly, and the Office of the Public Guardian of England and Wales with contributions from Age UK and Alzheimer’s Society. The guidance framework covers the legal and regulatory framework in England and Wales for attorneys and other appointed representatives plus best practice guidance for registering and administering third party mandates and general services to carers.

How to demonstrate compliance: Corporate self-assessment questions are included in ‘A framework for authorising people wanting to operate a bank account for someone else’ and incorporate these into standard procedure.

Level of difficulty: Amber. While comprehensive guidance has been recently published, we recognise that organisations will need to perform a gap analysis against the guidance and there may be challenges, such as IT system changes, in meeting the gaps.

** This is deliberately plural as England and Wales, Scotland and N Ireland have separate legal frameworks for attorneys etc.

¹³ www.bba.org.uk

Organisations commit to working in partnership with other relevant organisations and appropriate agencies to ensure that they develop and follow best practice when dealing with vulnerable customers, including reporting incidents of suspected financial abuse/harm.

Rationale: The intent behind this point is to ensure that customer facing staff have recourse to external expertise and advice and they are in a position to share information where it would help reduce risk of financial abuse.

Guidance: By 'relevant organisations and appropriate agencies' we mean those in the financial services industry, for example FOS¹⁴, as well as those outside, including OPG¹⁵, Trading Standards, the police and local authority vulnerable adults units.

We recognise that clarity is needed on data or information sharing with regard to the Data Protection Act 1998 and other legislation and the mechanics of how financial services organisations can collaborate with other parties, but in lieu of that we encourage financial service organisations to have documented procedures for identifying and acting upon potential instances of financial abuse/harm and to act in a spirit of shared commitment to make this work.

How to demonstrate compliance: Documented procedures relating to identification and responses to suspected cases of financial abuse/harm.

Level of difficulty: Red. We recognise the challenges associated with this point with regard to the Data Protection Act 1998, and other legislation and the mechanics of collaboration.

¹⁴ www.financial-ombudsman.org.uk/contact/tech-advice.htm

¹⁵ www.gov.uk/power-of-attorney/contact-office-of-the-public-guardian

Organisations will help and encourage their product, service and supply partners to assess their products and services where appropriate to ensure they support people affected by dementia.

Rationale: The good work that an individual financial services organisation has put into becoming 'dementia-friendly' could easily be undermined if one of their third party partners is not equally dementia-friendly.

Guidance: By 'product, service and supply partners' we mean third parties such as call centre providers, insurance brokers, claims assessors, etc.

The situation in mind here is where an organisation relies upon a third party to provide part of its service offering, for example claims processing. If the third party is not 'dementia-friendly' then the customer experience will be affected and blame will lie with the organisation, not the third party.

We recognise the challenge of enshrining 'dementia-friendliness' into partner contracts, so the emphasis of this point is on dialogue, encouraging awareness in partners and assisting them to become dementia-friendly.

How to demonstrate compliance: Supplier managers, procurement professionals, etc. are aware of the organisation's commitments to being dementia-friendly and incorporate this into their dealings with third party suppliers.

Level of difficulty: Green. We believe that most organisations should be able to adapt their existing supplier management procedures to accommodate this point.

Organisations will promote dementia-friendly practices within the financial services industry to help the industry deliver its dementia-friendly commitments.

Rationale: This point will ensure that the good work done by the focus group cited on page 29 will continue into the future.

Guidance: It was evident from the focus group that created this charter that there are many common issues that financial service organisations face around the topic of dementia and mental capacity in general. The overwhelming feeling espoused by the focus group was that there was tremendous value in sharing experiences and working together on common issues.

We therefore want to encourage organisations signing up to the charter to contribute to an ongoing dialogue and sharing of best practice.

Naturally we are cognisant of anti-competition legislation and the nature of any future discussions will be assured not to infringe this.

How to demonstrate compliance: Attendance at meetings or contribution to future discussions on best practice around dementia, including those facilitated by industry bodies.

Level of difficulty: Green. We believe that most organisations would be willing to share best practice in this area going forward.

Organisations will support staff who wish to take part in dementia-friendly and other community initiatives.

Rationale: The first point in the charter focuses on the impact that top down, stakeholder buy-in can have on an organisation becoming dementia-friendly. This last point focuses on the impact that individual members of staff can have to the same end.

Guidance: The CEO may set the organisation's moral compass but it is made reality by the staff working in the organisation. Furthermore many organisations encourage their staff to make a contribution outside the organisation in their local communities.

Examples include local fundraising schemes, employee volunteering schemes, Charity of the Year, 'Day to Make a Difference', etc.

We encourage organisations signing up to this charter to support members of staff in supporting community initiatives relating to dementia.

These include

- Dementia Friends¹⁶
- Dementia-friendly Communities¹⁷
- Local Dementia Action Alliances¹⁸

How to demonstrate compliance: compliance: Members of staff contributing to local initiatives with the support of the organisation.

Level of difficulty: Green. We believe that most organisations would be willing to share best practice in this area going forward.

¹⁶ [alzheimers.org.uk/site/scripts/documents_info.php?documentID=2070](https://www.alzheimers.org.uk/site/scripts/documents_info.php?documentID=2070)

¹⁷ [alzheimers.org.uk/site/scripts/documents.php?categoryID=200436](https://www.alzheimers.org.uk/site/scripts/documents.php?categoryID=200436)

¹⁸ www.dementiaaction.org.uk

Acknowledgements

We are grateful to the following organisations that formed a focus group to help create this charter.

Allianz
American Express
Association of British Insurers
Aviva
Barclays
British Bankers' Association
Building Society Association
Business Disability Forum
Direct Marketing Association
Financial Conduct Authority
Financial Ombudsman Service
HSBC
Legal & General
Lloyds Banking Group
National Australia Bank
Nationwide
Office of the Public Guardian
Payments Council
RBS
Sainsbury's
Santander
Trading Standards
Zurich

We thank Karishma Chandaria, Alzheimer's Society, Graeme Whippy, Lloyds Banking Group, and Lydia Saward as lead authors and Graeme for his role in chairing the focus group and managing the creation of the charter.

Notes

Alzheimer's Society is the UK's leading support and research charity for people with dementia, their families and carers. We provide information and support to people with any form of dementia and their carers through our publications, National Dementia Helpline, website, and more than 2,000 local services. We campaign for better quality of life for people with dementia and greater understanding of dementia. We also fund an innovative programme of medical and social research into the cause, cure and prevention of dementia and the care people receive.

Alzheimer's Society
Devon House
58 St Katharine's Way
London E1W 1LB

T 020 7423 3500
F 020 7423 3501
E info@alzheimers.org.uk
alzheimers.org.uk