



Working together to support vulnerable consumers

Executive Summary

WORKING TOGETHER TO SUPPORT VULNERABLE CONSUMERS

The UKRN and Revealing Reality have worked together to understand consumer attitudes towards the collection and sharing of vulnerability data. Our research combined industry interviews with firms and regulators alongside in-depth interviews and focus groups with members of the public. As part of the interviews and focus groups, researchers engaged with a range of individuals, experiencing a variety of vulnerabilities, conditions and life circumstances.

THE NEEDS OF THOSE WHO WOULD BENEFIT MOST FROM SHARING DATA ARE BEING OVERLOOKED

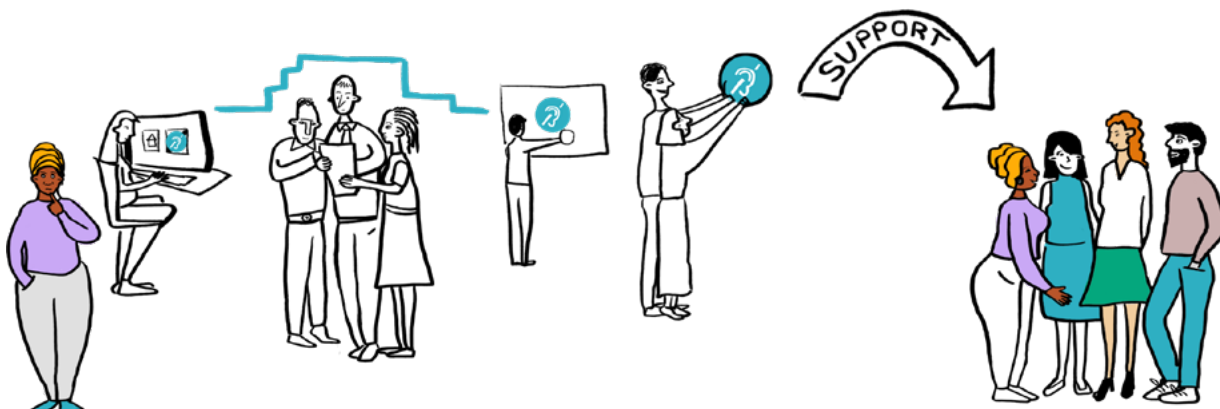
Those who have not experienced the impact of firms knowing about a condition or vulnerability find it hard to imagine the benefits this can have. As a result, those who are less vulnerable or in a period of transient vulnerability don't see the need for the sharing of vulnerability data between firms. They also find it hard to empathise at a societal level - struggling to envisage the massive benefits available from firms to those in less fortunate positions than themselves; their worries and concerns are therefore often the most vociferous.

Opinions seem to be clouded by a culture of fear and distrust when it comes to discussing data.

Our research found that there was a **clear relationship between severity of vulnerability, and openness to disclosing and sharing data.**

In fact, some of the most **vulnerable people suggested it was a firm's duty** to help their vulnerable customers. They felt that firms can provide real benefits, such as help with everyday necessities like checking a water meter or even reading a bill, to make their lives better.

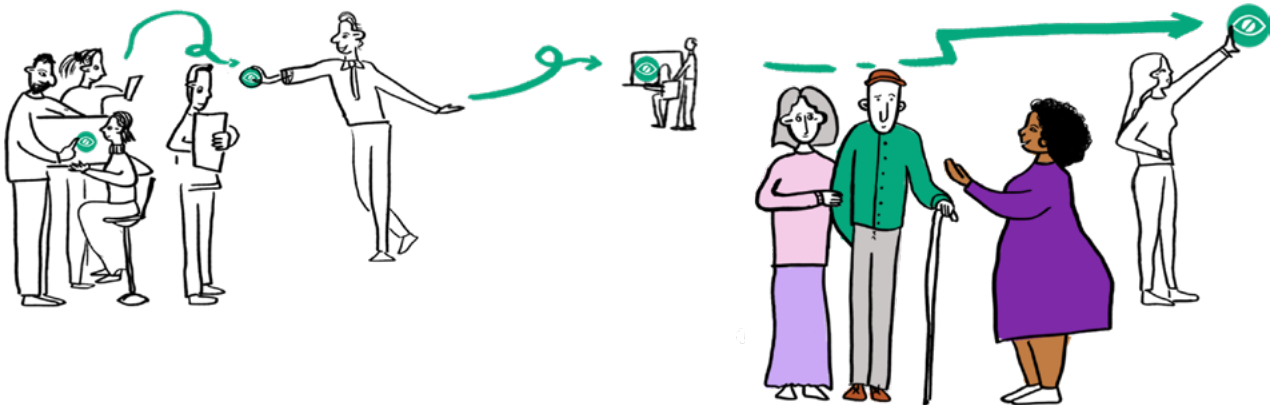
Many factors influence more vulnerable consumers' openness to data sharing. These include eliminating the need for consumers to repeat themselves to firms and instilling the feeling of having a safety net to support them should a condition or life circumstance worsen. **Positive progress in this area has been made**, for example, between the energy and water sectors - but more can be done.



FIRMS AND CONSUMERS OVERESTIMATE THE RISKS, AND UNDERESTIMATE THE BENEFITS OF DATA SHARING

Fear on the part of consumers and firms is standing in the way of progress. Whilst many concerns are valid, fear is often based on misconceptions that have stemmed from a lack of clarity when it comes to discussing data in general.

- **Consumers often react negatively initially to the idea of sharing vulnerability data.** They presume that firms will need to know everything about them and that there will be no limits on who in the organisation will see any vulnerability data.
- **Consumers are unclear on the benefits of disclosing vulnerability data in the first place.** Even when they start to understand more about the help that is on offer, they find it hard to see how any help could be translated across sectors through data sharing. Some sectors make more sense, for example utilities, but others, such as finance, seem harder to imagine.
- **Consumers are unclear on the safeguards that are in place.** They are unaware of organisations such as the ICO and feel that firms are not held accountable when handling and using sensitive information. Many consumers don't know where the information sharing stops.
- **Firms are underconfident in their ability to combat consumer reluctance to sharing vulnerability data.** Whilst some sectors/firms have made progress on the data sharing process, many are naturally concerned that consumers do not want data sharing to happen.
- **Firms and consumers are nervous navigating the legal parameters of data sharing, and working through the practicalities.** There is a reliance on consent and confusion around when other legal bases can and should be used.





MOVING FORWARD

There is genuine consumer concern about the disclosing and sharing of vulnerability data – firms are right to recognise and appreciate this concern due to the sensitivity of the information. People *are* reluctant to disclose data about their vulnerability, and they *are* sceptical about firms sharing this information between each other. It is therefore conceivable that this issue spirals to the point where the data sharing process is impossible to fully achieve – and that the barriers seem too difficult to overcome.

However, there is a significant group of people who know about the help that's on offer, value it, and want to see it further improved and utilised.

The most vulnerable people are not only the most in need of help, but they are also the most open to the disclosing and sharing of data as a means to get that help.

There is an opportunity right now to make a difference in this space. The barriers articulated earlier by both firms and consumers can be addressed and overcome.

Potential next steps:

- **Reframe the language around 'data sharing'** to combat negative associations with the term. This will boost confidence for both consumers and firms in discussing and being able to recognise the benefits of data sharing.
- **Use a needs-based approach.** To consumers, this feels like the right balance of storing and using information in a non-intrusive, but useful, way.
- **Build empathy with those who would benefit from data sharing.** Help consumers to understand and value the support that is in place for vulnerable people. This will enable them to better conceive of the benefits that would come with firms being able to share information between them.
- **Better communicate the safeguards in place.** Make consumers aware of who firms are accountable to, provide guarantees on how data will be use and who it will be shared with, and offer clarity about what type of data is being shared.
- **Use a data sharing model that gives consumers control.** Consumers would like to know exactly what information is held about them, and have the ability to update this.
- **Build confidence using legal bases.** Consumers and firms need to understand and feel confident using legal bases other than consent. Consumers default to wanting to be asked for their consent before firms do anything with their information. However, when the other legal bases are explained, they can see the value.



HOW CAN WE HELP YOU?

November 2020