Help! (second edition)

What support can firms give disabled consumers and people in vulnerable situations?

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This paper was written by a group of authors who have been involved in work on support needs, vulnerability, and disability over the last decade.

Each author has contributed to this paper in an independent capacity.

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What We Need

Help Build a More Accessible World

MONEY ADVICE TRUST

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Foreword

This is the second edition of our guide about the support that essential services – like banking, energy, water, delivery, or phone and broadband – give to vulnerable or disabled consumers.

Support is any action that makes it possible for a consumer to access, use, and benefit from an essential service, or to overcome any practical barriers to achieving this. It also includes any action that helps prevent a consumer experiencing harm when using a service or its products.

In this guide, we therefore list over 120 different types of support that disabled or vulnerable consumers may want an essential service to meet.

This 'list' of support needs is selective and non-exhaustive and there is no expectation that any one firm or sector could meet all the needs listed. Nor is it assumed that every support need or reasonable adjustment that a consumer might require (or have right to) is also included.

Instead, this guide represents a starting list for services to learn from, build upon, and grow.

Throughout 2026 and beyond, we will again publish further updated and expanded editions of this guidance as a 'living document'. And critically, an important part of this plan includes encouraging disabled and vulnerable consumers to continue to identify and describe more support needs, reasonable adjustments, and systems changes through our dedicated online platform www.WhatWeNeed.Support.

Consequently, we call to everyone involved in essential services who is picking-up this guidance to come together with disabled or vulnerable customers to define, design, and deliver the support that is needed - as while the challenge of this is ever-present, the difference it can make to peoples' lives is incalculable.

This foreword and paper was written by Chris Fitch, Amy Kavanagh, Christine Tate, Dan Holloway, Edward Grant, Elizabeth Blakelock, Faith Reynolds, Jamie Evans, Jo Giles, Johnny Timpson, Kevin Still, Lee Healey, Liz Brandt, Martin Coppack, Mike Adams, Peter Tutton, Steve Crabb, Steven Donovan, and Vanessa Northam. These group of authors have been involved in work on vulnerability, disability and support need design over the last decade, and each author has contributed to this paper in an independent capacity.

Author biographies and conflict of interest statements are found at the back of this paper. The views of the authors are their own and do not represent those of the organisations with which they work.

Please note: this guide has a clear remit of documenting the needs that consumers may have, and to help expand the range that services meet. However, it is important to be clear about what this guide does not aim to achieve. This includes (a) directing firms on exactly which support needs to meet, (b) providing practical instruction on how to identify, understand, or deliver support, or (c) how to improve design, data collection, or data protection/GDPR processes. For this guidance, we recommend www.moneyadvicetrust.org/vulnerability

A. We all need support

This guide is about the support that essential services give to vulnerable or disabled consumers.

An essential service is something that consumers cannot do without to live their everyday lives. They include financial services, energy and water, phone and internet, and delivery/postal services.

The guide has been written to help:

- essential services provide the support that disabled or vulnerable consumers[A] need
- these consumers to tell more of their essential services about their support needs
- our regulators to understand the actions needed (in and across sectors) to achieve this.

What is support?
In this guide, support is any action that assists or makes it possible for a consumer to:

- access, use, and benefit from an essential service
- overcome any practical barriers to achieving this
- avoid preventable harm from using the service or its products.

This includes the support directly given by frontline and field-based staff during individual interactions to meet a consumer's needs, resolve problems, and avoid future difficulties. But it also includes the conscious design of an essential service's journeys, products, communications, and systems in ways that help and support their disabled and vulnerable consumer-base to equally access and use these like any other consumer.

Who needs it?
Among the 54 million adults in the UK, around 14 million of us are disabled[1], 25 million are in a vulnerable situation[2], and 4 million are providing unpaid care to someone who is[3]. However, despite disability and vulnerability to harm being a daily fact of life for so many, we know these consumers can face preventable barriers or problems in using essential services:

- 40% of disabled adults report being unable to access or use many essential services because these do not offer the support or reasonable adjustments they need[4]
- 70% of vulnerable consumers report issues in interacting with their service provider due to a health condition, while 23% indicate similar issues due to a negative life event[5]

Consequently, with the likelihood of becoming disabled or vulnerable to harm increasing over time, most of us reading this guide will have support needs at some point in our lives.

Footnote A: this guide uses 'disabled consumer' and 'vulnerable consumer' simply for brevity and consistency. However, we recognise that other meanings and definitions also exist (see Appendix 1), including 'consumers in vulnerable situations' and 'consumers who require extra help'.

Box 1: everyone recognises this need

Consumers
"It is crucial that companies proactively design their services with different disabilities and needs in mind. [We want] people to be able to easily contact companies, without unnecessary barriers and in the way that suits them best" **Which?**[6]

Financial Conduct Authority: financial services
"Vulnerability is not a buzzword…We expect firms to provide support that meets their customers' needs, [that enables] consumers to realise the benefits of the products and services they buy, pursue their… objectives and ensure that they can act in their own interests." **FCA**[7]

Ofwat: water
"Companies' approaches to delivering extra help to customers should not be static. [All companies]… are likely to have room for improvement…[and] should look to challenge themselves to further reduce the risk of harm to customers who need extra help." **Ofwat**[8]

Ofgem: energy
"Vulnerable customers should have their needs identified, be able to easily notify and update their circumstances, and have better understanding of and access to support services designed to suit their circumstances and meet their needs." **Ofgem**[9]

Ofcom: telecommunications
"We encourage providers to promote the full range of extra help, support and services they offer to customers. We also remind providers that they are obliged to promote the services they offer to meet the needs of customers with disabilities" **Ofcom**[10]

Ofcom: delivery
"Disabled people [can experience]… couriers not allowing enough time at the door, parcels being left in inaccessible places, and operators not acting on specific delivery instructions…[P]ostal operators must have policies and procedures in place to ensure disabled customers can communicate their delivery needs to them, and firms will need to ensure couriers…meet those." **Ofcom**[11]

B. The value of support

As we have noted, everyone will need support at some point in their lives. Such support can allow consumers to access, use, and benefit from a range of essential services. And this can improve, change, and enrich the everyday lives of millions of customers.

Commercial opportunity
However, identifying the support that disabled customers or those in vulnerable situations can need to use our services or products can reveal a commercial opportunity, as well as a regulatory or legal responsibility.

Survey research with disabled consumers, for example, has found that:

- 75% think UK businesses are losing out because their services are not inclusive[31]
- 48% would take their business to another provider if they had problems purchasing a product or service online[4]
- Over 40% reported that their choice of provider was limited due to their access needs not being met, including finding a new energy, gas, or broadband provider (41%), or changing a personal bank account (40%)[4].

The Purple Pound
Until recently, it was estimated that the combined spending power of households with at least one disabled person was worth around £274 billion per year to the UK economy.

However, while this figure has been extensively cited by Government[32], charities[31], and commercial organisations[33] to provide a business case to encourage the design of more accessible products and services, it is based on data from 2017/18[31].

Consequently, in preparing this paper, the University of Bristol's Personal Finance Research Centre and the Money Advice Trust have updated this estimate using the latest available data[34].

As Box 2 shows, the 2023/24 Purple Pound is now estimated to be worth **£446 billion pounds per year to the UK economy**. After taking inflation into account, between 2015 and 2024 the Purple Pound's value has increased by nearly 30%.

Caution should always be exercised in interpreting such estimates. For example, this rise could partly reflect increases in the number of UK disabled households[34], or Cost of Living payments made by the Government to eligible households[38]. At the same time, other studies astutely highlight the 'extra costs' on individual and household income of simply being disabled[35-37].

However, despite this, the Purple Pound provides one recognised way of thinking about the economic spending power of disabled households, and the University of Bristol and Money Advice Trust are currently seeking funding to explore and improve this statistic further.

Box 2: the Purple Pound

The Purple Pound for 2023/24 may be worth £446 billion per year to the UK economy.

How is this calculated?
This uses data from the Family Resources Survey (FRS). Since 1992, the FRS has published annual data on the incomes and living circumstances of households and families in the UK, and is based on a representative sample of data from 20,000 households.

Within the FRS is the 'Households Below Average Income' (HBAI) data-set. This contains information on weekly household income after housing costs (AHC – this includes any rent payments and mortgage interest payments but not mortgage principal costs). The FRS also holds data on the number of disabled people (adult or child) living within each household.

In Table 1 below, two sets of Purple Pound estimates are given. The first set of estimates are based on FRS and price data in each year (reflecting prices at the time that each FRS survey was conducted). Meanwhile, the second set are based on price data for 2023/24 (to take account of inflation across the years, and to allow comparisons to be made between different years).

Table 1: Purple Pound (2015-2024)

Year	Value (estimates based on prices in that specific year)	Value (estimates based on prices in the year 2023/24)
2015/16	£259bn	£344bn
2016/17	£266bn	£350bn
2017/18	£274bn	£350bn
2018/19	£294bn	£368bn
2019/20	£307bn	£377bn
2020/21	£326bn	£397bn
2021/22	£346bn	£404bn
2022/23	£403bn	£425bn
2023/24	£446bn	£446bn

Notes: to calculate these estimates we used the FRS to (a) take weekly household income (AHC) for each household that includes at least one disabled person; (b) calculate an annual household income (AHC) for each of these households; (c) take the weighted total number of households that include at least one disabled person (i.e. the total number of disabled households in the UK); (d) add up all of the annual household incomes (AHC) of these households; (e) resulting in the 'Purple Pound' (the total annual household income (AHC) for all households that include at least one disabled person). Adjustments were then made for inflation for the third column shown.

C. What support can firms give?

This section describes some of the common support needs that services can give to consumers.   It starts, however, with three key principles to guide our thinking about support.

1. People are different
Consumers with the same disability/in the same situation can have different support needs (so establishing an individual's needs will prevent unhelpful actions or assumptions).

Although we all know that each of us is different, we sometimes can find ourselves putting individuals in groups or boxes ("they have cancer", "they are bereaved", "they have hearing loss") and then trying to identify what type and level of support might be best suited to these groups. This is understandable – and knowing a consumer's situation can help kick-start our thinking about which support options might be relevant (or even specific to a particular disability or circumstance).

But to prevent our assumptions narrowing or not offering the right support to individual consumers, it should be standard practice for essential services to engage the consumer in a conversation about 'what else' might work for them. Equally, to avoid teams in non customer-facing operations, design, or communications using the same static or unchanging 'support checklists' in their work, it is critical that user-testing, consumer bodies, and customer challenge groups are engaged to continually check and refresh the support options offered to consumers.

2. But common needs do exist
Despite individual differences in situation and need, common support options do exist (and designing services to meet these needs will help a large range of different consumers).

While individual consumers' needs will vary, we know that some types of support are helpful to people with markedly different disabilities, conditions, or circumstances.

For example, consumer decision-making ability can be affected not only by Dementia, but also by English language difficulties, the side-effects of treatment or medication, or even a urinary-tract infection leading to delirium. Consequently, support options that indicate a consumer may need general 'help in understanding numbers and information', or 'requires more time to respond or complete tasks' could help all these multiple consumer segments, rather than just one.

3. Services can't meet every need
Services must constantly work to understand needs, including those which cannot be met (and doing this will require collecting data, prioritising action, and clear boundary setting).

Essential services cannot meet every consumer support need (either from outset or in totality). And as described later in this guide, the criteria for prioritising which are met (and which are not) should be based on requirement, relevancy, reasonableness, and risk.

Box 3: the support needs

This guide presents a selection of needs organised into the following themes:

- writing to consumers | phoning consumers | meeting consumers
- delivering to consumers | interacting with consumers |
- knowing consumers’ circumstances | knowing who helps consumers
- supporting consumers during service interruptions (power cuts/water shortages)
- wider system or operational changes

Where did the needs come from?
The consumer support needs were primarily drawn from three publicly available sources:

- **Support Hub (SH)** – this project provides a ‘Tell Us Once’ tool that allows disabled or vulnerable consumers to share their reasonable adjustments and support needs with multiple essential service organisation through one simple process. The support needs in Support Hub are open-source, were developed through research with over 1200 disabled or vulnerable consumers, and were translated into ‘support codes’ by a partnership involving Aqua, Smile, Nationwide, Bank of Scotland, MBNA, Bip, HSBC, Ovo Energy, Lloyds Bank, Zempler Bank, Birmingham Midshires, Pulse, Marbles, M&S Bank, First Direct, Fluid, Tesco Bank, The Co-Operative Bank, Halifax, Opus, Scottish Widows, AO Finance, Argos, Debenhams, John Lewis Partnership, Newpay, and NewDay. https://supporthub.experian.co.uk/

- **Priority Services Register/Care Register/Support For All initiative** – energy and water firms in England, Wales, and Scotland record information about customers/households with extra support needs in each firm’s Priority Services Register (PSR), and in Northern Ireland a separate ‘Care Register’ scheme for energy and water firms is used. Meanwhile, the Support For All Initiative (led by Northumbrian Water) is working to facilitate data-sharing between energy and water firms. https://www.thepsr.co.uk/

- **www.WhatWeNeed.Support (WWNS)** – this is an open-source website that collates and lists the changes that disabled and vulnerable consumers want businesses, services, and institutions to meet. It describes these changes in such a way that organisations are able to act on them, and also allows disabled and vulnerable consumers to add, contribute, and improve these lists so they cover a more accurate and wider range of needs and adjustments. WWNS is run by Dan Holloway and Chris Fitch and is funded by a seed-funding grant from Experian’s Support Hub Team to improve knowledge and practice. https://WhatWeNeed.Support/

Additional sources (OTHER) were also used and further information is available in **Appendix 2.**

What else do I need to know?
The support needs in this guide represent a selective and non-exhaustive list of what is possible. No essential service will be able to (or perhaps need to) meet every support need in this guide. Therefore readers are encouraged to use these as a **starting point, rather than a final word.**

Support needs: writing to consumers

All essential services will send written communications to their customers (including letters, emails, and other forms of information). A failure to communicate with vulnerable consumers in ways they can understand may result in an increased risk of exclusion or harm, or consumers not understanding the information they are sent.

When you write to me	What does this mean?	Source
I cannot reply in writing to paper letters. If you want me to respond, please give me another way to do this.	Organisations will provide another way for you to communicate with them.	SH
Send in a format I can listen to (audio CD)	Organisations will share communications as audio CDs where possible.	SH/PSR
I need you to read my bill to me over the telephone	Organisations will read a consumer's bill to them over the phone.	PSR
Send in Braille Grade 1	Organisations will send communications to you in Braille Grade 1 format where possible. Grade 1 Braille uses one Braille character for each letter, number or punctuation mark.	SH
Send in Braille Grade 2	Organisations will send communications to you in Braille Grade 2 format where possible. Grade 2 or contracted Braille uses contracted versions of some common words as well as characters.	SH
Send in large print (18-20 point)	Organisations will send communications in 18-20 point where possible.	SH
Send in giant print (20-32 point)	Organisations will send communications in 20-32 point where possible.	SH
Send in an 'Easy Read' format.	Organisations will send communications in a simple or plain English format.	OTHER
Use a light pastel coloured paper to reduce colour contrast	Organisations will send communications in a lower colour contrast format where possible. Note that the colours may vary across different organisations.	SH

Support needs: speaking to consumers on the phone

While there has been an expansion in the range of channels used to engage with consumers, the telephone still occupies a place in many essential service's operations. Understanding what reasonable adjustments or support needs consumers have in relation to this is therefore key.

When you phone me	What does this mean?	Source
I cannot speak on the phone - do not call me.	Where possible, organisations will not call you.	SH
I use text-to-speech software to communicate - please take this into account.	Extra time will be given for you to respond on phone calls.	SH/PSR
When calling me use Relay UK.	If organisations need to phone you, they will use Relay UK.	SH/PSR
When I call you I need to use Relay UK - please take this into account (and talk naturally, listen and try not to interrupt).	Organisations will know you are using Relay UK, and will allow extra time for you to respond.	SH/PSR
Where possible, only phone me between 8am to noon.	Wherever possible, when organisations need to call you, they will call you during your preferred hours.	SH
Where possible, only phone me between noon to 5pm.	Wherever possible, when organisations need to call you, they will call you during your preferred hours.	SH
Please ask me whether I will need time for a break in our conversation.	Organisations will ask whether you need more time in telephonic discussions, or will try keep calls as short as possible.	SH
Where possible, use a BSL Video Relay Service to call me.	Organisations will note this on your account and, where possible, contact you to schedule a BSL video relay call.	SH/PSR
Where possible, I need to contact your organisation using a BSL Video Relay Service.	Firms will note this on your account, and where available and possible a BSL video relay calls will be scheduled with your selected organisations.	SH/PSR

When you phone me	What does this mean?	Source
When calling me, give me extra time to answer the phone.	Extra time will be given to answer the phone.	PSR
I am unable to self-serve using the telephone (including using telephone menus/Interactive Voice Response).	An alternative form of service to telephone menus/IVR will be offered to the consumer.	Telecom
I need an alternative way to complete security or identification and verification checks.	An alternative method of ID&V will be provided.	Telecom

Support needs: meeting consumers

Scheduled meetings or appointments between consumers and essential services can take place in-person (such as when energy or water staff visit a person's home, or a consumer visits a bank branch for an adviser appointment) or remotely (such as those via video or telephone). Where these meetings take place, consideration needs to be given to any reasonable adjustments or support needs to allow the consumer to achieve what is required from the interaction.

When you meet me	What does this mean?	Source
I cannot attend meetings in person - if a meeting is required please contact me to schedule an alternative.	Instead of in-person meetings, organisations will offer an alternative where possible.	SH
I have someone that will accompany me to provide support - please take this into account.	Organisations will know someone may accompany you. When you arrive, or someone visits your home, they will discuss the role of this person in the meeting.	SH/ PSR
I have an assistance dog that will accompany me - please take this into account.	When visiting a branch or store, staff will be as accommodating as possible to ensure you and your assistance dog are supported.	SH
I prefer to meet or wait in a quieter space (if available).	Organisations will try to provide a quieter or private space. Please note that this applies to pre-arranged meetings, or once you have identified yourself to staff, and may not be always be available at all branches/ stores.	SH
I prefer to meet or wait in an open area with people around (if available).	Organisations will try to provide an open space. Please note that this applies to pre-arranged meetings, or once you have identified yourself to staff, and may not be always be available at all branches/ stores.	SH
I need you to arrange for a manual deaf-blind interpreter to be present or available (if we schedule a meeting).	For pre-arranged in person meetings, organisations will try to arrange an interpreter where this is possible. Please note that availability will depend on individual location.	SH/ PSR

When you meet me	What does this mean?	Source
I need you to arrange for a BSL interpreter to be present (if we schedule a meeting).	For pre-arranged in person meetings, organisations will try to arrange an interpreter where this is possible. Please note that availability will depend on individual location.	SH/ PSR
I require a hearing loop.	For pre-arranged meetings or once staff have looked up your account with you in branch/store, organisations will try to connect you to a hearing induction loop. Please note that availability will depend on individual location.	SH
I need to see your face when you speak- it helps me to understand.	Staff will make sure you can see their face when they are speaking. This applies to pre-arranged meetings or once staff have looked up your account with you in branch/store.	SH
I find social interaction difficult - please take this into account.	Staff will be notified that you may not be comfortable with social interactions, and try to accommodate you as much as possible.	SH
If you are visiting my home, I need you to give me extra time to answer the door.	Knock and wait is a simple process that is available across companies utilising PSR data.	PSR
If you are visiting my home, I need you to use a password scheme.	A password for security can be provided and shared to allow for worry free access into customers' homes.	PSR
If you are visiting my home, I would prefer a female representative to attend.	Additional presence preferred can allow for anxieties of attendance to be supported.	PSR
If you are visiting my home, I will need advance notice so I can arrange for an additional person to be present.	Interactions and processes are designed to allow for customers to have a friend, family member or neighbour included when we visit.	PSR
Please tell me in advance what questions you will ask me.	When firms arrange an appointment to discuss things with a consumer, they will send a list of the topics to be covered and any information the consumer will need to provide.	WWNS

Support needs: delivering to consumers

Disabled people are more likely to experience parcel delivery problems than non-disabled customers. It is therefore key that support needs for delivery are considered by essential services.

When you deliver to me	What does this mean?	Source
Please allow extra time for me to get to the door	Delivery personnel will wait longer than for other customers before assuming you are not in and leaving.	PSR
I may look or sound different from how you expect. Please do not draw attention to this	Delivery personnel will not make comments or act in a way that indicates surprise at a customer's voice or appearance.	WWNS
I cannot talk (including to acknowledge your arrival). Do not think I am rude or assume I am not coming to meet you.	Delivery personnel will wait longer than for other customers before assuming you are not in and leaving, even when a customer has not acknowledged their arrival.	WWNS
I cannot hear. When you arrive, please text.	Delivery personnel will text, rather than calling, to say they have arrived.	WWNS
I need you to leave the parcel in an agreed place where I can reach it.	Delivery personnel will leave items in a place that has been notified by the customer.	WWNS
I need you to bring the parcel inside and leave it in a place I can reach it.	Delivery personnel will bring the parcel inside and leave it in a place the customer indicates.	WWNS
I need you to open the parcel for me.	Delivery personnel will open the parcel in the presence of the customer.	WWNS
Please knock loudly.	Delivery staff will knock on the customer's door loudly even if there is a bell.	WWNS
My circumstances mean I use a staffed mailbox service. Please deliver to a mailbox.	Firms that have a policy of not delivering to mailbox addresses will make an exception.	WWNS
Please use the doorbell when you arrive (unless – as in gas emergency situations – using a doorbell could be dangerous).	Delivery personnel will let the customer know they have arrived by ringing the doorbell rather than knocking, texting, or calling.	WWNS /PSR
Please allow me extra time when signing for deliveries.	Delivery staff will give customers more time to sign. This may include putting paper or tablets down so the customer can use them.	WWNS
I cannot sign. Please allow another way for me to confirm delivery.	Delivery personnel will provide an alternative way for customers to acknowledge receipt of delivery.	WWNS

Support needs: interacting with consumers

Interactions (other than scheduled appointments or meetings) with disabled consumers or those in vulnerable situations may also require support needs or reasonable adjustments being met.

When you interact with me	What does this mean?	Source
I need longer appointments.	For pre-arranged interactions, organisations will arrange a longer appointment.	SH
Speak slowly and clearly.	Staff will speak slowly and clearly to you and, where possible, prevent the use of jargon and use simpler language to explain complex concepts.	SH
Give me more time to respond or complete tasks.	Staff will give you extra time to respond and complete tasks so you do not feel rushed.	SH
Help me with my understanding of numbers and information.	Staff will try to use clear and full explanations, explain complex topics or numbers clearly, and check your understanding.	SH
Help me with my memory as I may forget information.	Staff will try to use clear and full explanations, explain complex topics or numbers clearly, and check your understanding and memory on important topics.	SH
My speech or voice may sound different to what you expect. Please don't comment on this, but do take it into consideration.	Staff will not draw unnecessary attention if your voice may sound different to expected.	SH
English is not my first language - I may need more time when interacting with staff.	Staff will try accommodate where possible, such as speaking slowly and clearly, avoiding jargon or difficult terms, and giving you more time to respond.	SH/ PSR
English is not my first language - I need an interpreter.	Staff will try accommodate where possible to provide an interpreter service.	SH/ PSR
My speech may be affected (including involuntary words, stammering or sounds). Please give me time to respond and do not draw attention to this.	Staff will be aware that your speech may be affected and will try accommodate wherever possible, such as not drawing unnecessary attention to this, and giving you more time to respond.	SH

When you interact with me	What does this mean?	Source
Please provide a written summary of agreed action points.	Staff will provide a summary in writing of the agreed action points from a conversation.	WWNS
I need additional support with fault diagnostics, resetting or adjusting settings on a piece of equipment, or engaging with technology.	Staff will give extra help and not make assumptions about what a customer can do when dealing with a technical issue.	OTHER (telcoms)
I need a technician to make a home visit, as I am unable to deal with fault diagnostics, resetting or adjusting settings on a piece of equipment, or engaging with technology.	Staff will not ask the customer to take action themselves, but where available will arrange for a technician to make a home visit.	OTHER (telcoms)
I am unable to visit a store or physical premises to return or have a piece of equipment repaired, or to pick-up or collect a piece of equipment.	Staff will offer an alternative method of engagement, where available, other than a visit a store or physical premises	OTHER (telcoms)

Support needs: knowing my circumstances

Over time, individuals will experience changes in their circumstances (such as life events, health incidents, or financial changes) they would like their essential service provider to take account of.

About my circumstances	What does this mean?	Source
Severe or long-term health issue/illness	When you are interacting with organisations (such as on the telephone, in a branch, or in a person's home), staff will be able take this into consideration and offer any additional support available.	SH/PSR
Terminal illness		SH/PSR
Bereavement		SH/PSR
Divorce or relationship breakdown		SH/PSR
Change in my financial situation		SH/PSR
A significant change in my circumstances not listed above		SH/PSR
'Upgrade blocks' need to be placed on my account.	Organisations will not upgrade a phone to a different package.	OTHER (telcoms)
Spending limits need to be placed on my account.	Organisations will place a spending limit on a customer's account.	OTHER (telcoms)
I am a carer and dependent on my service.	Organisations will take this into account when interacting with you.	OTHER (telcoms)

Support needs: knowing who helps me

About who helps me	What does this mean?	Source
Please tell me about how to set up Third Party Access on my accounts.	Customers will be sent information on how to set up Third Party Access on their accounts.	SH
I would like to set-up a power of attorney	Customers will be sent information on how to set up a Power of Attorney for their accounts.	SH/PSR
I would like to set-up a trusted third party to help me manage my account, interactions, and communications with you.	Services are in place to allow a trusted third party to support or act on behalf of customers (with limitations).	SH/PSR

Support needs: my communication priorities

A failure to communicate with disabled or vulnerable consumers in ways they can understand may result in an increased risk of exclusion or harm, or consumers not understanding the information they are sent.   Consequently, taking communication priorities into account is key.

When you communicate with me	**What does this mean?**	**Source**
Where possible, communicate with me via letter (paper)	Wherever possible, organisations will communicate with you in your preferred format.	SH/PSR
Where possible, communicate with me via the telephone	Wherever possible, organisations will communicate with you in your preferred format.	SH
Where possible, communicate with me via email (paperless).	Wherever possible, organisations will communicate with you in your preferred format.	SH
Where possible, communicate with me via webchat in your app.	Wherever possible, organisations will communicate with you in your preferred format.	SH
Where possible, communicate with me via SMS/text messaging.	Wherever possible, organisations will communicate with you in your preferred format.	WWNS

Support needs: service interruptions

During an interruption to an energy or water service (e.g. a power cut or water shortage) it is important that consumers with specific disabilities, medical needs, or vulnerabilities are identified and provided with additional support. This is particularly key where households contain individuals who use electric powered medical equipment, or who have medical needs that require ongoing access to clean water. In addition, where a planned interruption or bad weather warning is known, pre-contact will be made to allow customers to prepare and make alternative arrangements (full and alternative contact details are therefore key to enable contact to be made with such customers).

Service interruptions	**What does this mean?**	**Source**
I use a stairlift/hoist/electric bed	During an interruption to essential services, contact will be made check a battery back-up is in place (and additional time given when knocking at a door or calling the customer).	PSR
I use a heart/lung or ventilator machine	During a large-scale interruption, customers will be contacted as a first priority to check they have access to back-up battery. If not, steps will be taken to provide an alternative power supply.	PSR
I use a dialysis, feeding pump or automated medication	During a large-scale interruption, customers will be contacted as a first priority to check they have access to back-up batteries.. If not, steps will be taken to provide an alternative power supply.	PSR
I use a nebuliser or apnoea monitor	During a large-scale interruption, these customers will be prioritised for contact to understand the impact of an outage on them (particularly if this is a lengthy outage).	PSR
I use a careline/telecare alert system	Organisations will provide guidance and/ or analogue phones (including education on preparation and back-up batteries, the provision of other aids such as wind-up torches, and potentially additional water). Alert systems may need to be reset after power outages, and carers/alarm companies informed.	PSR

Service interruptions	What does this mean?	Source
I use medicine refrigeration	During an interruption, alternative cooling aids, small generators, or access to mobile support vehicles (equipped with fridges) or community pharmacies (also with fridge facilities) may be provided.	PSR
I am water dependent for medical reasons (consumption or showering/ bathing)	During an interruption, contact will be made as a first priority with advice, estimated timing of interruption (which can sometimes be planned around a customer's treatment), bottled water supplies, and power source where water needs to be heated. In some situations, alternative accommodation may be provided.	PSR
I use an oxygen concentrator/oxygen supply	During an interruption, the delivery of additional back-up cylinders may be arranged for the duration of the power cut. As with other categories, water companies should consider the delivery of bottled water in an interruption.	PSR
I am a wheelchair user	During an interruption, a text update service will be provided, and customers helped to plan to manage the situation. Alternative heating and cooking facilities and bottled water delivery may be offered.	PSR
I use other electrical medical equipment	Alternative plans will be made with the customer to accommodate their need and minimise impact.	PSR
I have poor, altered, or no sense of smell	Organisations may provide safety devices, alarms, gas detectors, water quality monitors, gas safety values, and other forms of support.	PSR
I have poor, altered, or no sense of taste	Organisations may provide safety devices, alarms, gas detectors, water quality monitors, gas safety values, and other forms of support.	PSR

Service interruptions	**What does this mean?**	**Source**
I have children under 5 years of age	In an interruption, organisations may offer alternative water supply, alternative accommodation, and other needs based on age and specific support needs.	PSR
I am recovering from surgery or hospital	Organisations will consider an alternate contact for communication, as well as the need for water or potential evacuation.	PSR
I have restricted hand movement	Organisations may offer to move a customer's meter, accept an alternative contact for bills, bottled water delivery, and offer Emergency Control Valve, RCD and other equipment (including water Outside Stop Valve).	PSR
Young Adult Householder	Organisations may offer to engage with an alternative contact, offer a chaperone service for home visits (arranged prior), and a password for security.	PSR
Life changes – Divorce, bereavement, redundancy	Organisations will consider – as with other above support need categories - any accompanying financial difficulty.	PSR
Blind & Partially Sighted	Organisations will offer alternative formats, password security schemes, and that any maintenance and streetwork does not pose an accessibility issue.	PSR
Unable to answer door	Organisations will be aware that a customer cannot answer their door (e.g. this is not a knock & wait) and an alternative contact should always be engaged with first.	PSR
Dementia(s)/cognitive impairment	Organisations will take this need into account, including the use of alternative or third-party nominees.	PSR
Chronic/serious illness	Organisations will take this need into account, including alternative or third-party nominees.	PSR

Support needs: system wide changes

Some features of the systems that firms rely on to deliver a service, such as their website or an app, might make then harder for disabled or vulnerable consumers to use. Many adjustments that would make these systems easier to use are easiest to implement at the design and build stage rather than making individual changes for each customer.

When I use your system	What does this mean?	Source
I need more time before being logged out for inactivity.	Within a secure environment, customers should be able to select the length of time for which a screen can be inactive before the account is locked.	WWNS
I need more attempts at a PIN before you lock me out.	Within a secure environment, customers should be able to select a number of times they are allowed to enter incorrect details before being locked out of an account.	WWNS
I need you to avoid unnecessary pop-ups.	This especially applies to pop-up chatbots offering help. Wherever functionality uses pop-ups, there should be an easy to navigate way for users to enable or disable it.	WWNS
I need you to send me more reminders.	Where text or email reminders are sent for certain actions, allow customers to select the communication channel, timing and frequency of those reminders.	WWNS
I need you to send me fewer reminders.	Where text or email reminders are sent for certain actions, allow customers to select the communication channel, timing and frequency of those reminders.	WWNS
I need my progress saved before being automatically logged out.	If a platform logs users out for inactivity, it should first automatically save any progress made up to that point.	WWNS
I need you to tell notify me of necessary actions 30 days in advance.	Where a system requires a necessary action (such as confirming information is correct), inform users of this requirement 30 days before the deadline.	WWNS
I need to see what I am typing when entering a PIN or password.	Having a “see what I am typing” option is standard accessibility, but often not implemented for passwords. And rarely implemented for PINs.	WWNS

Support needs: transporting consumers

Disabled consumers can face significant barriers when using buses, coaches, and rail transport. Under the Equality Act 2010, public transport operators have legal obligations to give support and reasonable adjustments to such consumers (typically detailed in 'Accessible Travel Policies')[24–30]. However, other organisations – like insurance or utility firms needing to move consumers in an incident or service interruption - can learn from these adjustments to transport (including the critical role of staff visibility and availability to deliver this support to consumers).

When I am travelling	What does this mean?	Source
I need accessible information about accessible travel	The transport operator must ensure that a variety of accessible formats are available for customers. The information must detail how to request or book assistance when travelling. This includes accessible websites, telephone lines, marketing and comms, including social media, leaflets and posters.	Accessible Transport Policies (ATP) and Equality Act 2010 (EA2010)
I rely on communication aids or interpreters and require alternative means of contacting a transport provider about information, support or purchasing tickets.	Transport providers must ensure there are accessible alternatives to phone lines or webforms. This could include using email, Relay UK or a BSL video service.	ATP and EA2010
I have booked passenger assistance (train and coach only).	The customer has booked assistance for their journey in advance. This booking will stipulate their needs. The transport provider is legally obligated to meet these needs. Failure to meet the support needs confirmed in the booking could result in complaints, investigation by regulator / ombudsman and or legal action.	EA2010 ATP Public Service Vehicle Accessibility Regulations (2023/1990)
I am a TUAG (Turn Up and Go) passenger or I requested passenger assistance when I arrived at the beginning of my public transport journey.	The customer has exercised their right to "turn up and go". They have declared their support needs on arrival at their origin station/stop / hub. ATP guidance states that rail operators have to take steps "where reasonably practicable" to meet these needs.	EA2010 ATP Guidance PSVAR 2023 PSVPR 2002

When I am travelling	What does this mean?	Source
I require assistance purchasing a ticket	Staff support ticket purchasing including applying appropriate local and national concessions, advising about best available prices for the journey / travel period and using ticket vending machines.	EA2010 ATP Guidance PSVAR 2023 PSVPR 2002
I need to use communication support, aids or tools when interacting with staff.	Staff to be aware of and understand communication needs, including BSL, assistive devices and tools. This could include schemes like the sunflower lanyard to indicate nonvisible disability. Staff need to be prepared to find alternative ways to communicate. Staff must also be able to sign post to additional communication tools for example “please offer me a seat” cards or badges.	EA2010
I require a hearing loop	Hearing induction loops to be available and activated for key locations like ticket offices, information desks and Public Announcements in transport hubs. Where available on trains, coaches and buses hearing loops should be turned on and clearly signposted.	EA2010 National Technical Specification Notice Accessibility (NTSNA) 2025 PSVAR 2023
I require support navigating a station or transport hub.	Staff available to provide navigational assistance including wayfinding and directions, sighted guiding through the environment and accompanying customers to navigate through the best step free route.	EA2010 ATP Guidance
I prefer to wait in a quieter space (if available).	Staff to provide details of waiting rooms, quieter areas of stations or designated accessibility lounges / meeting points.	EA2010 ATP Guidance
I prefer to wait in an area visible to staff (if available)	Staff to ensure customer is seated or offered an area to wait where they are visible to staff.	EA2010 ATP Guidance

When I am travelling	What does this mean?	Source
I require a ramp or lift when boarding or alighting a bus, coach or train, I am using a wheelchair or have other mobility needs	Staff will deploy a ramp or lift. This will either be an automatic ramp / lift or a manual ramp / lift deployed by a member of staff.	EA2010 ATP Guidance PSVAR 2023 PSVPR 2002
I need assistance boarding or alighting the coach, bus or train	I require station / transport hub staff, on board staff and or the driver to assist me as I board or alight. This includes stepping on or off the train / bus, assistance to my seat and or assistance with luggage.	EA2010 ATP Guidance PSVAR 2023 PSVPR 2002
I need assistance making a connection in my journey	Whether a Turn Up and Go or pre-booked assistance customer, staff must ensure the right information and help is available to enable customers to make a connection. This includes transferring trains or buses, or to alternative transport form as part of their journey, like a tram, metro or taxi.[1]	EA2010 ATP Guidance PSVAR 2023 PSVPR 2002
I require a safe secure space for me / my mobility aid when travelling	Staff will ensure that the wheelchair space is available, clear of customers, luggage and buggies. This includes an additional priority seat space for assistance dogs.	EA2010 ATP Guidance PSVAR 2023 PSVPR 2002 NTSNA 2025
I am travelling with luggage	Staff are required to assist with luggage if the absence of this assistance would cause a barrier to travel. Transport operations must clearly communicate the limits of this assistance according to staff welfare and or appropriate policies regarding luggage space or storage.	EA2010 ATP Guidance
I require a priority seat when travelling	Staff will encourage other customers to vacate priority seats either in person or via announcements or signage.	EA2010 ATP Guidance
I am travelling with a companion.	I may be entitled to discounted travel for my companion. I may need my companion to be seated near to me so that they can assist me.	EA 2010 ATP Guidance

[1] These additional transport modes are outside the scope of this guidance.

When I am travelling	What does this mean?	Source
Audio announcements are inaccessible to me	The station, transport hub, train, coach and or bus should have visual displays. Staff must inform me of key information, like when does my train leave, what number bus is this, have I reached my stop / terminus, if visual displays are not available.	EA2010 ATP Guidance PSVAR 2023 PSVPR 2002
Visual announcements are inaccessible to me	The station, transport hub, train, coach and or bus should have audio announcements. Staff must inform me of key information, like when does my train leave, what number bus is this, have I reached my stop / terminus, if audio announcements are not available.	EA2010 ATP Guidance PSVAR 2023 PSVPR 2002 NTSNA 2025
In the event of emergency or disruption, I will require additional support.	If the customer has booked rail assistance the transport operator has a legal obligation to ensure the journey is completed using alternative accessible transport. For example, a wheelchair adapted vehicle taxi or private hire vehicle. If a rail customer did not book assistance, the transport operator is required to take actions that are “reasonably practicable” to ensure they have a safe accessible onward journey. If the customer is travelling via coach or bus the operator is required to consider reasonable adjustments in the event of emergency or disruption.	EA2010 ATP Guidance
If I want to complain or give feedback	The transport provider must ensure that there are multiple accessible routes to making a complaint or providing feedback. This information should be available in person, online, via telephone, print resources and staff must be able to direct the customer to the appropriate route for the complaint if reported in person.	EA2010

D. How do firms do this?

Essential services can meet many, but not every, consumer need.

Clearly, there will be some needs which – due to their complexity or nature – lie outside a service's capability to provide meaningful support, other than signposting to external specialists. But there are others which if addressed could help many more consumers to access, use, and benefit from services that are essential to their daily lives, but not currently working for them.

How then – given the often-overwhelming range of potential support needs that exist - do services determine which of these are met in practice? And with what priority and order?

Where do we start?

There are at least four factors that essential services can consider in their decision-making:

- **required** – some forms of support may be required by law or expected by regulation, and essential services should be aware of their obligations to these frameworks (Box 4).

- **relevant –** support needs should be prioritised that allow disabled and vulnerable consumers to both (a) undertake core account, product, or service management tasks (such as making payments, resolving queries, and (b) receive the same equivalent service as other consumers. To do this, services need to carefully isolate what these core account, product, or service management tasks are, then identify what barriers might exist to a consumer being able to undertake these or receive an equivalent service, and finally define what support might be needed for different consumers to achieve this without detriment, exclusion, or harm.

- **reasonable** – considering how *reasonable* it would be to provide support is key, including:

  - how practical it is to meet the support need
  - the degree of financial or other costs of meeting the need/making an adjustment
  - how large any disruption would be in meeting the need/making an adjustment
  - the financial or other resources the service has to make the potential changes
  - the amount of resources already spent on making adjustments for a consumer/group
  - the availability of financial or other forms of assistance for achieving the same outcome.

- **risk** – as noted above, services will need to understand and establish the risk of harm, detriment, or exclusion to disabled and vulnerable customers of *not* providing a specific support need or adjustment, and their appetite for this risk to exist.

What else can we do?

To inform their decisions, services should draw on data about the composition and prevalence of need in their customer base/target market. Where needs are introduced, staff should know what is expected of them (and how far they can go with support and whether signposting to specialist external support is required), as well as how support needs will be recorded on internal systems.

Box 4: selected legal and regulatory resources

A range of additional legal and regulatory frameworks relating to support exist, but essential services should be aware of the following (limited) selection.

Law: equality legislation
Introduced in 2010, the Equality Act changed English, Welsh, and (some) Scottish law. Harmonising discrimination legislation, it established rights for nine groups including disabled people. Importantly, the Act required 'service providers' to ensure that people with disabilities were not substantially disadvantaged in terms of their access and use of these services.

In respect to disability, essential services had to become more aware of the needs of their disabled customers, and to take reasonable steps to anticipate and proactively prepare to meet these needs (which practically requires considering support options in advance for a range of disabilities, rather than waiting for disabled customers to ask for support).

In Northern Ireland, the Disability Discrimination Act (1995) and other separate legislation deal with equality issues[12], with this being overseen by the Equality Commission.

Law: mental capacity
Mental capacity is the ability of an individual consumer to make an informed decision (e.g. to understand, recall, and evaluate relevant information, and communicate their choices). Such decision-making is key to many consumer interactions with services in terms of the support given to aid consumer decision-making, or to involve third-parties with a mandate to make decisions for a consumer. Across the UK countries, there are separate 'mental capacity acts' (for acting and making decisions about individuals who lack capacity)[13-15], as well as detailed accompanying 'codes of practice'[16-17].

Regulation
As noted in Box 1, the importance of support is central to each regulatory framework on consumers in vulnerable situations. However, it is worth spotlighting three concepts from these:

- **foreseeable harm** – in the **FCA's Consumer Duty**[18], an emphasis is placed on anticipating and preventing harm to consumers (where it could be reasonably expected that a firm could have known and foreseen this harm). This requirement to think ahead about the support that consumers may need closely fits with the Equality Act's 'anticipatory duty'.
- **inclusive design** – in the **Ofwat**[22], **Ofgem**[20], **Ofgem**[21] and **FCA**[19] guidance on vulnerability, there is repeated reference to the barriers that disabled or vulnerable consumer face in using services and providing support to overcome these or 'designing these out' of journeys.
- **disclosure and data-recording** – in all regulatory frameworks, services are encouraged to create mechanisms and opportunities to facilitate the consumer disclosure of support needs, accurately record these as data, and sharing these within (and potentially across) services.

E. Where do firms get more help?

This guide has listed over 120 ways that services – like banking, utilities, phone, broadband, retail, and delivery – can better support disabled and vulnerable consumers.

For some readers, this number will confirm how far essential services have come in recent years, given their starting position in the early 2000s of offering comparatively limited support options. But for others, this number may provoke frustration that important needs are missing from this guide, and that progress needs significant acceleration rather than (premature) celebration.

So, acknowledging both the progress that has been made and yet needs to become, what resources are available to help essential services achieve this?

Different services face the same challenge
The first major resource for essential services is each other.

Essential service organisations, disabled and vulnerable consumers, and the organisations supporting, regulating, and informing this activity, are all working to the same broad objective: improved outcomes based on more accessible services and a smoother experience. However, across this network of 'fellow travellers', a considerable duplication of effort exists in how essential services are identifying, understanding, and defining support needs for potential introduction into their operations.

Although exceptions exist, individual services often work separately to identify support needs, engage serially with lived experience consumer/groups to develop these, and lack a mechanism or repository with which to share these with other services.

To counter this duplication and fragmentation of effort, and also inconsistency of support needs offered across different services, the **www.WhatWeNeed.support** website brings together in a single place a range of support needs identified by services or proposed by consumers.

One consumer, multiple services
In recognising our common objective, we also need to build 'support bridges' with one another.

While essential services span multiple sectors and industries, there is usually a single consumer or household receiving these services. However, where these consumers are disabled or in a vulnerable situation, they can find themselves in a dilemma: here, they may require extra support to access or use that service, but they do not have the resources, energy, or time to disclose their circumstances or needs to each service in turn.

As we move forward, we need to ensure we build 'Tell Us Once' tools – such as the '**Support For All**' and '**Support Hub**' initiatives - that allow consumers to share their support needs with multiple organisations via a single process to provide 'support bridges' across different sectors. 'Smart data' initiatives that facilitate consumer data-sharing may also complement and extend this activity further.

Author biographies

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Register of interest: nil.

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Register of interest: these roles are undertaken on a voluntary and unpaid basis.

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Register of interest: nil

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Register of interest: Nil.

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Register of interest: Purple provides products and services to disabled people and businesses and supporting organisations to improve the disabled customer experience.

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Appendix 1: definitions

Disability

Social model (Scope, 2024)
"[P]eople are disabled by barriers in society, not by their impairment or difference. Barriers can be physical, like buildings not having accessible toilets. Or they can be caused by people's attitudes to difference, like assuming disabled people can't do certain things."

Equality Act (2010)
"A mental or physical impairment…[with] a substantial and long-term adverse effect on a person's ability to carry out normal daily activities"

Vulnerability:

FINANCIAL CONDUCT AUTHORITY
"A vulnerable customer is someone who, due to their personal circumstances, is especially susceptible to harm, particularly when a firm is not acting with appropriate levels of care"[19]

OFGEM
"[A consumer is vulnerable] when [their] personal circumstances and characteristics combine with aspects of the [energy] market to create situations where [they] are: significantly less able than a typical consumer to protect or represent [their] interests; significantly more likely than a [domestic] consumer to suffer detriment or that detriment is likely to be more substantial"[9]

OFCOM
"Anybody can face circumstances that lead to them becoming vulnerable - temporarily or permanently. This might include physical or mental health problems, specific characteristics such as age or literacy skills, or changes in personal circumstances such as bereavement, job loss or changes in household income. [We] refer to people whose circumstances have led them to becoming vulnerable as 'vulnerable customers'. We recognise that organisations use a range of different terminology and some people might not like to be labelled as a vulnerable customer"[10]

OFWAT
"A customer who due to personal characteristics, their overall life situation or due to broader market and economic factors, is not having reasonable opportunity to access and receive an inclusive service which may have a detrimental impact on their health, wellbeing or finances"[8]

ICO
"Individuals can be vulnerable where circumstances may restrict their ability to freely consent or object to the processing of their personal data, or to understand its implications... Most obviously, children are regarded as vulnerable to the processing of their personal data since they may be less able to understand how their data is being used, anticipate how this might affect them, and protect themselves against any unwanted consequences. This can also be true of other vulnerable sections of the population such as elderly people, or those with certain disabilities. Even if the individuals are not part of a group you might automatically consider vulnerable, an imbalance of power in their relationship with you can cause vulnerability for data protection purposes if they believe that they will be disadvantaged if the processing doesn't go ahead."[23]

Appendix 2: sources of support needs

Support Hub
https://supporthub.experian.co.uk/

This project provides a 'Tell Us Once' tool that allows disabled or vulnerable consumers to share their reasonable adjustments and support needs with multiple essential service organisation through one simple process.

The support needs in Support Hub are open-source, were developed through research with over 1200 disabled or vulnerable consumers, and were translated into 'support codes' by a partnership involving Aqua, Smile, Nationwide, Bank of Scotland, MBNA, Bip, HSBC, Ovo Energy, Lloyds Bank, Zempler Bank, Birmingham Midshires, Pulse, Marbles, M&S Bank, First Direct, Fluid, Tesco Bank, The Co-Operative Bank, Halifax, Opus, Scottish Widows, AO Finance, Argos, Debenhams, John Lewis Partnership, Newpay, and NewDay.

Priority Services Register
https://www.thepsr.co.uk/

The PSR is a free service provided by energy and water companies which, through customer registration, captures at a 'Needs Code' level, details about a household's support needs. This allows companies to not only deliver consistency across the country in the support provided through process design but it also allows more tailored approaches, providing equal access to essential services for both daily interactions as well as incidents on a larger scale.

Companies also deliver safeguarding services which are in addition to the PSR (and companies work to share good practice on this, including via the Safeguarding Customer Working Group which is a cross-industry expert group, which collaborates with charity/consumer council and expert partners).

WhatWeNeed.Support
https://WhatWeNeed.Support/

This is an open-source website that collates and lists the changes that disabled and vulnerable consumers want businesses, services, and institutions to meet. It describes these changes in such a way that organisations are able to act on them, and also allows disabled and vulnerable consumers to add, contribute, and improve these lists so they cover a more accurate and wider range of needs and adjustments. WWNS is run by Dan Holloway and Chris Fitch and is funded by a seed-funding grant from Experian's Support Hub Team to improve knowledge and practice.

Other sources
Other contributions of support needs were made from across the essential services sectors including people working in telecommunications, delivery, energy, water, and financial services.

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