

Vulnerable Customer Policy

Master List Ref COM007	Release Date September 2017	Review Date 11/12/2025	Next Review Date January 2027
Version: 6.3	Process Owner Legal & Compliance	Reviewed by Martin Pearson	Approved by FSUKL Board

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1 Statement

Firstsource Solutions UK Limited (FSUKL) is a provider of business process outsourcing services acting on behalf of clients (including regulated firms) in financial services, energy, water, telecommunication and media and healthcare sectors. We provide frontline and back-office services that support our clients' customer journeys, including debt collection, customer service, and arrears handling.

This document sets out the policy for FSUKL in identifying and dealing with vulnerable customers and is a minimum requirement. FSUKL's business is to act on behalf of clients as an undisclosed agent, and therefore when conducting this work it is often required to follow client procedures. Accordingly, FSUKL will complete an exercise prior to commencing the contract to compare the relevant FSUKL policies against the client procedures to ensure that as a minimum FSUKL policies are being met. Where there are gaps, these will be discussed with the client. The same exercise and approach will be adopted as part of any mid-contract change control process.

We implement vulnerability strategies that are:

- Aligned to client-specific policies
- Aligned to regulatory requirements
- Adapted to each sector and service line

We work collaboratively with our clients to ensure that policies, training, monitoring and escalation processes are consistent with all regulatory obligations. These include, but are not limited to, the following regulatory bodies:

- FCA. Specifically:
 - The FCA's [Principles for Business](#), and in particular Principle 6 (treating customers fairly), Principle 7 (communications must be clear, fair and not misleading) and Principle 12 (Consumer Duty), where applicable
 - [FCA CONC 7.2](#) (Clear policies for customers in arrears)
 - [CONC 7.10](#) (Suspending recovery)
 - [ICOB 2.7](#) (delivering good outcomes for customers experiencing financial difficulty)
 - [MCOB 13.3](#) (Dealing fairly with customers)
 - [FG21/1](#) (Fair treatment of vulnerable customers)
 - Consumer Duty generally (see [March 2025](#) guidance)
- OFGEM
- OFWAT
- OFCOM
- Compliance with the GDPR.

Management Information related to Vulnerable Customers tracked and considered at the regular Business Review meetings with our Clients and is part of our Consumer Duty reporting.

This policy details the rules and guidelines embedded in our business model and culture to uphold our regulatory commitments.

2 Scope

This policy is relevant to all employees and third-party suppliers. Employees includes the directors, permanent and fixed-term employees, consultants, contractors, trainees, interns, part-time, full-time, casual workers and temporary agency workers, agents, and appointed representatives acting on behalf of FSUKL. This policy should be read in conjunction with the appropriate procedure related to the customer product type for guidance on how to apply this policy.

- Vulnerable Customer Procedure – (Mortgages & Home Finance)
- Vulnerable Customer Procedure – (Consumer Credit) or
- Vulnerable Customer Procedure – (Utilities)

3 Regulatory Responsibilities

Where FSUKL delivers activity on behalf of a regulated client, we ensure end-to-end alignment with their governance framework, vulnerability definitions, and customer journey oversight.

Our controls, MI, and agent training are designed to reflect both our own obligations and those of our clients

Regulator	Relevant Rules	Responsibilities
FCA CONC	FCA CONC 7.2 CONC 7.10	Fair treatment of vulnerable customers who are in or approaching arrears or in default Suspending recovery and providing sufficient time for customers (or their representatives) to understand and make a decision
FCA ICOB	ICOB 2.7	Actions required to deliver good outcomes for customers in financial difficulty
FCA MCOB	MCOB 13.3	Ensuring policies and procedures are in place to dealing fairly with customers with financial difficulties.
FCA Consumer Duty	PRIN 2.1.1 PRIN 2A	Embedding good outcomes into all processes, setting out the overarching principles for fairness, and the Consumer Duty requirements.
OFGEM	Standards of Conduct, PSR (Priority Services Register) Consumer Vulnerability Strategy	Identify and register vulnerable customers, offer alternative formats, avoid disconnection

Regulator	Relevant Rules	Responsibilities
OFWAT	Service for all vulnerability guidance	Support access to water for all, proactive identification of water poverty or digital barriers
OFCOM	Treating Vulnerable Customers Fairly Guide	Tailored communications, remove barriers to engagement, escalate persistent non-contact for welfare checks

4 Vulnerability Core Principles

In [FG21/1](#) the FCA defines vulnerability as “someone who, due to their personal circumstances, is especially susceptible to detriment, particularly, when a firm is not acting with appropriate levels of care.

Anybody can face circumstances that lead to them becoming vulnerable, this may be a temporary or permanent situation. In short, anyone can be vulnerable at any time. We are committed to ensuring all vulnerable customers experience outcomes as good as any other consumer and to receive consistently fair treatment across all of the sectors within which we work.

4.1 Drivers for Vulnerability

Below are the 4 key drivers of vulnerability defined by the FCA in [FG21/1](#):

- Health – health conditions or illness that affect the ability to carry out day to day tasks and/or manage their finances.
- Life events – such as bereavement, or sudden caring responsibilities
- Resilience – a low ability to cope with emotional situations or financial shock.
- Capability – limited knowledge of financial matters or confidence in managing money. This also includes a low capability of other relevant areas e.g. digital skills or literacy.

Below are example characteristics associated with the four drivers of vulnerability:

Health	Life events	Resilience	Capability
Physical disability	Retirement	Inadequate (outgoings exceed income) or erratic income	Low knowledge or confidence in managing finances
Severe or long-term illness	Bereavement	Over- indebtedness	Poor literacy or numeracy skills
Hearing or visual impairment	Income Shock	Low savings	Poor English language skills

Health	Life events	Resilience	Capability
Mental health condition or disability	Relationship Breakdown	Low emotional resilience	Poor or non-existent digital skills
Addiction	Domestic abuse (including economic control)		Learning difficulties
Low mental capacity or cognitive disability	Caring responsibilities		No or low access to help or support
	Other circumstances that affect people's experience of financial services e.g., leaving care, migration or seeking asylum, human trafficking or modern slavery, convictions		

4.2 Interactions with vulnerable customers

It is important for Employees to remember that vulnerability can be temporary, sporadic and not always permanent. When interacting with potentially vulnerable customers a flexible approach may be required. Customers should feel that they are being treated as individuals and Employees must not form any pre-conceptions about the customer simply because of their potential vulnerability, but they should be cognisant of any potential vulnerabilities they may encounter based on the target market analysis defined by the product manufacturer.

Employees must also be aware that customer vulnerabilities may impact how well customers understand the information. For example, communications may need to be adapted because of a customer vulnerability (see [Section 6](#) for further information). As an example, when discussing affordability with a customer who has a low knowledge/low ability to understand finances, Employees may need to go slower or the customer may need to have questions repeated or explained.

Similarly, customers with a visual impairment may need a different format for written communications (e.g. Braille) as required in FCA [Principle 7](#) (a firm must pay due regard to the information needs of its customers and communicate information to them in a way which is clear, fair and not misleading).

4.3 FCA Cross-Cutting Rules & Outcomes

Under the Consumer Duty, the FCA have set out cross-cutting rules and four outcomes firms should consider.

FCA Cross-cutting rules. Firms must:

- Act in good faith towards retail customers.
- Avoid foreseeable harm to retail customers.
- Enable and support retail customers to pursue their financial objectives.

Four outcomes:

- Products & Services – Designed to meet customer needs, including those in vulnerable circumstances.
- Price & Value – Ensuring fair pricing and preventing exploitative practices.
- Consumer Understanding – Providing clear, accessible information to support informed decision-making.
- Consumer Support – Delivering effective customer service that meets the needs of all consumers, including those facing challenges.

4.4 OFGEM: Consumer Outcomes for Energy Customers

Ofgem has defined four consumer outcomes to ensure fair treatment in the energy sector:

- Positive Customer Experience – Consumers should have a smooth and supportive interaction with their supplier, encouraging future engagement.
- Accessible and Timely Information – Customers must receive clear, relevant, and well-timed information to make informed decisions about their energy supply.
- Effective Issue Resolution – Suppliers must ensure efficient and fair processes that meet customer expectations and resolve concerns appropriately.
- Consideration of Vulnerability – Suppliers must recognise and accommodate vulnerable customers, ensuring equal participation in the energy market.

4.5 OFWAT: Consumer Outcomes for Water Customers

Ofwat's regulatory framework ensures that water companies provide fair and accessible services, particularly for vulnerable customers:

- Affordability & Financial Support – Water companies must offer social tariffs and flexible payment options for customers in financial hardship.
- Accessible Customer Service – Firms must provide clear communication and alternative contact methods for vulnerable customers.
- Proactive Identification of Vulnerability – Companies should engage with customers to identify those in need of additional support.

- Fair Complaint Handling & Resolution – Customers must have effective channels to raise concerns and receive timely resolutions.

4.6 OFCOM: Consumer Outcomes for Telecoms Customers

Ofcom's regulations ensure fair treatment and accessibility for telecoms customers, particularly those in vulnerable situations:

- Fair Billing & Pricing – Providers must ensure transparent pricing and prevent unfair charges for vulnerable customers.
- Accessible Customer Support – Firms must offer multiple communication channels, including options for disabled customers.
- Flexible Payment & Debt Support – Telecom providers must offer affordable repayment plans for customers facing financial difficulties.
- Effective Complaints Handling – Customers must have clear, fair, and timely resolution processes for service-related issues.

5 Our Approach

We understand that vulnerable customers may be more likely to have additional needs which, if not met, could limit their ability to make the right decision or to represent their own interests. We work closely with our clients to understand the target market and customer needs, ensuring our approach provides appropriate care and mitigates foreseeable harm, reflecting on sectoral and regulatory requirements.

We ensure all employees understand how their role affects the fair treatment of customers, including how to approach difficult situations with empathy and record sensitive information accurately (see [Section 7.1](#)). This also extends to digital self-service pathways, to ensure customers are provided appropriate support and are not at risk of unfair treatment by differing channels.

We ensure all employees are trained in line with FSUKL and our clients' procedures to recognise signs of vulnerability and how behavioural bias may affect the customers' ability to make decisions. We respond to the customer needs through well-designed service and procedures to provide the appropriate support to vulnerable customers.

When designing or amending any customer-facing journey, we always consider the needs of vulnerable customers at the design stage.

5.1 Engaging with vulnerable customers

Employees are trained to identify potential signs of vulnerability through active listening and behavioural cues. We recognise that vulnerability may be temporary, sporadic or permanent, and that it may be linked to personal circumstances, health conditions, capability or life events as set out in [Section 4.1](#).

FSUKL make use of several models to help our staff become more familiar with the approach to identifying and helping vulnerable customers. These are set out below.

5.1.1 TEXAS (engaging the customer)

We use the TEXAS model as a practical guide to managing disclosures when the customer offers up a disclosure. It is not intended to be a tool to solicit a disclosure:

- **Thank** the customer for the disclosure.
- **Explain** how their data will be used (in line with GDPR).
- **Xplore** the needs and impact of their circumstances.
- **Ask** what support they need.
- **Signpost** to internal or external help where appropriate.

Agents are empowered to record, escalate and respond appropriately to any disclosure, ensuring dignity and respect throughout.

5.1.2 IDEA (understanding the impact of the vulnerability)

If TEXAS alone does not provide enough insight, especially during escalated or complex calls, we will use the IDEA framework:

- **Impact:** what does the vulnerability prevent the customer from doing?
- **Duration:** How long has the customer lived with the vulnerability?
- **Episodes:** has the customer experienced this more than once?
- **Assistance:** Is the customer receiving any formal or informal help?

This framework supports a deeper understanding of fluctuating or long-term conditions, allowing tailored and sustainable outcomes.

5.1.3 BRUCE (identifying a lack of capacity)

To support consistent and appropriate responses, we apply the BRUCE framework to where there is a need to identify a lack of capacity:

- **Behaviour** and ability to communicate.
- **Remembering** and processing information.
- **Understanding** financial implications.
- **Capacity** to make informed decisions.
- **Engagement** with the process.

This assessment helps tailor our communications and support mechanisms, including adjusting contact channels, pacing interactions, or offering additional explanation and time.

5.1.4 CARE (supporting)

Delivering Appropriate Support with CARE

We ensure our service meets the CARE standard for delivering appropriate and consistent support:

- **Consider** the customer's unique needs.

- **Action** adjustments to meet those needs.
- **Record** the support provided, securely and transparently.
- **Evaluate** the effectiveness of the support and continue to adapt if required.

All staff receive extensive vulnerability and empathy training, this is a blend of face to face facilitator led and online training which includes practical scenarios, case studies, and regular refreshers.

5.1.5 BLAKE (Severe vulnerability or suicidal disclosures)

The BLAKE Protocol is designed to assist employees in high-risk situations or where a customer expresses suicidal thoughts, indicates abuse, or shows signs of extreme distress. The guidance to employees is:

- Breathe (to focus)
- Listen (to understand)
- Ask (to discover)
- Keep safe (to keep the customer safe from harm)
- End (to end with a summary)

See also Emergency Disclosures in [Section 7.1.3](#).

6 Communications

We work closely with our clients to ensure that customer communications are clear, accessible, and tailored to the needs of our vulnerable customers. Below are examples of how we collaborate and the minimum standards we require to ensure customers receive fair treatment and we deliver good outcomes:

- Multi-Channel Support
 - Ensuring customers can engage via their preferred communication channel, such as phone, email, web chat, and postal correspondence.
- Alternative Formats
 - Providing braille, large print, and audio versions of key documents for customers with sensory impairments.

7 Consent & Recording of Sensitive Information

To meet our obligations under FCA CONC 7, [ICOB 2.7](#), MCOB 13, and Consumer Duty, we may need to record information about a customer's vulnerability to ensure they receive fair treatment.

Some vulnerability information, such as health conditions or disabilities, is special category data under the UK GDPR and Data Protection Act 2018. Our approach is set out below.

7.1 Special Category Data Handling

This was formerly known as sensitive personal data.

When managing customers in vulnerable circumstances, Employees may need to capture and process Special Category Data (such as health, disability or safeguarding information).

Under [GDPR Article 9\(2\)\(a\)](#) recording special category data is only allowed if the customer has given explicit consent to do so. Customer vulnerabilities, including health conditions often fall under this criteria. For completeness, the full list of special category data is

- racial or ethnic origin,
- political opinions, or trade union membership
- religious or philosophical beliefs,
- genetic and biometric data
- data concerning health
- data concerning a natural person's sex life or sexual orientation.

7.1.1 Minimal Data Collection:

Only information that is strictly necessary to ensure the fair treatment of the customer and to meet our regulatory obligations will be collected and recorded. Where possible, we will apply a generic vulnerability flag instead of recording detailed information.

7.1.2 Explicit Consent

If it is necessary to record specific health, disability information or other special category data, we will request explicit consent from the customer. The customer must be informed of their right to withdraw consent at any time.

Without consent, we will note only a generic vulnerability flag to ensure the customer still receives appropriate treatment but ensure we are not processing sensitive data without consent.

To meet this requirement, this may require staff to

- Clearly explain why we are recording the information.
- Describe how it will be used.
- Explain who it will be shared with (e.g. within FSUKL, Employees or with the client).
- Provide the customer's right to withdraw consent at any time.

7.1.3 Emergency Disclosures:

Where there is a risk of serious harm or threat to life (e.g. suicidal intent, domestic abuse), Employees may process and share information without consent under the "vital interests" basis of [Article 6\(1\)\(d\) UK GDPR](#).

7.1.4 Security & Retention:

All sensitive data must be stored securely with strict access controls. Data must only be retained only for as long as necessary to meet regulatory, contractual, or support obligations and is then securely deleted in line with our **Data Retention Policy**.

Within FSUKL, it is often a client requirement that our staff operate on, and store all data within client systems with restricted access. Where this applies, it is mandatory to ensure the client data recording, storage and retention rules meet the FSUKL data policies and a minimum.

7.2 Third-Party Engagement

7.2.1 Power of Authority (England, NI and Wales)

A Power of Authority (POA) is a legal document that allows a third party to act on behalf of someone else (usually a friend or a close family member). The person who is granted the authority is known as the Attorney. The person who grants the authority is known as the Donor (or Granter in Scotland).

All POA enable someone to speak on behalf of a customer. However, it is important to know which POA is in place because not all POAs allow the Attorney to make decisions on behalf of the donor.

There are currently two types of POA in England, Northern Ireland and Wales which are set out below.

7.2.1.1 Lasting Power of Attorney (LPA)

There are two types of LPA:

- **Property & Financial Affairs LPA:** Allows the attorney to manage money and property. Can be used while the donor still has capacity or after losing it. Note in Northern Ireland, this is known as an Enduring Power of Attorney.
- The person with the power to act is:
 - While the donor has capacity the donor retains full control and can make decisions. The attorney can act only if the donor authorises immediate use in the LPA.
 - After the donor loses capacity the attorney makes financial decisions.
- **Health and Welfare LPA:** Covers personal welfare and healthcare decisions. Only comes into effect after loss of capacity. In Northern Ireland there is no LPA to cover Health and welfare.
- The person with the power to act is:
 - While donor has capacity the donor makes all health and welfare decisions. The attorney cannot act.
 - After donor loses capacity the attorney makes health and welfare decisions (including care and medical treatment).

7.2.1.2 Ordinary (General) Power of Attorney (OPA)

- Intended for short-term or specific transactions (e.g., selling a house or signing documents).
- Terminates upon loss of capacity.
- The person with the power to act is:
 - While donor has capacity the attorney can act for specific financial tasks, but the donor retains full control.
 - After donor loses capacity the OPA becomes invalid because the donor cannot delegate decisions anymore.

7.2.2 Power of Authority (Scotland)

In Scotland, there are four different types of POA:

7.2.2.1 Continuing Power of Attorney (CPA)

- Empowers an attorney to make decisions regarding the granter's property and financial affairs.
- Can be set to take effect immediately upon registration, or only if and when the granter loses capacity, (this will be specified in the POA document).
- The person with the power to act is:
 - While the granter still has capacity: the granter retains control and can act themselves; the attorney can also act if the POA allows immediate effect.
 - After loss of capacity: attorney makes decisions on finances.

7.2.2.2 Welfare Power of Attorney (WPA)

- Provides authority over decisions about the granter's healthcare, personal welfare, and living arrangements.
- Only becomes active if and when the granter loses mental capacity.
- The person with the power to act is:
 - While the granter has capacity: granter makes all welfare decisions; attorney cannot act.
 - After loss of capacity: attorney makes welfare decisions.

7.2.2.3 Combined Power of Attorney (CPA & WPA)

- Includes both financial and welfare powers in one document, providing comprehensive authority across both areas.
- The person with the power to act is:
 - Financial decisions: attorney may act immediately if specified, but granter can still act while capable.
 - Welfare decisions: attorney only acts after granter loses capacity.

7.2.2.4 General Power of Attorney (GPA)

- Used for specific or temporary purposes, such as managing transactions while a granter is still able to act.
- Becomes invalid if the granter loses mental capacity.
- The person with the power to act is:
 - Granter retains full control and can revoke at any time.
 - Becomes invalid if granter loses capacity.

7.2.3 Letters of Authority

It is not uncommon for a vulnerable customer to have provided a written request asking FSUKL to speak to someone else on their behalf. Where there is no POA in place it would uncompassionate and not within the spirit of the Consumer Duty requirements not to progress the call further. Accordingly, the customer can provide their consent for us to speak to another person on their behalf, however, this does not constitute a POA and therefore:

- Account level detail cannot be disclosed.
- The third party must consent for their observations to be shared internally or with the client.
- Any decisions must be made by the customer.
- The customer may also be directed to third party organisations who may assist them in making more permanent arrangement, such as a POA if that is appropriate (this is unlikely to be appropriate for a temporary vulnerability).

7.2.4 Friends, Family, and Carers

The same provisions will apply as in [Section 7.2.3](#). However, it will be necessary to gain the explicit verbal consent from the customer prior to speaking with a third party on their behalf.

The Carers protocol/Carers drill is a tool adopted by FSUKL which can be used both:

- To identify those customers who may be potentially vulnerable because they have caring responsibilities; and
- To obtain information from customers who are carers and are acting on behalf of the person for whom they are caring.

7.2.5 Debt Management companies and other third parties

All Employees must proactively explain how a customer can authorise a third party to act on their behalf.

If a third party organisation, such as a debt management company a social worker or a charity is acting on behalf of the customer, FSUKL will not directly contact the customer without consent unless there is a justifiable reason to do so, for example; issuance of statutory notices or where FSUKL have made repeated unsuccessful efforts to contact the third party.

FSUKL is committed to maintaining a positive working relationship with appropriately authorised and recognised third parties to support vulnerable customers.

FSUKL will never refuse to deal with an authorised third party that is assisting a customer to manage their debts or developing a repayment plan with the customer.

8 Debt & Mental Health

Where evidence of vulnerability is required, Employees will apply a 'minimum evidence' approach to reduce customer burden.

Debt & Mental Health Evidence Forms (DMHEF) are accepted as evidence from healthcare or social professionals. Operations will always consider proceeding with unsubstantiated information where it allows us to treat the customer fairly (see [CONC 7.2](#), [ICOB 2.7](#) and [MCOB 13.3](#)).

Where FSUKL has been notified (or ought reasonably be aware) that a customer lacks mental capacity to make relevant financial decisions, Employees must be cognisant of [CONC 7.10](#). This requires FSUKL to suspend recovery or provide sufficient time for customers (or their representatives) to understand and make a decision.

9 Digital Journey for Vulnerable Customers

Our digital service is designed to be inclusive and accessible, ensuring vulnerable customers can manage their accounts with ease. FSUKL ensures digital platforms comply with the Web Content Accessibility Guidance (WCAG). Key adaptations include:

- **Accessibility Features**

- Screen Reader Compatibility – Ensuring the portal is fully accessible for visually impaired users.
- Adjustable Text Size & Contrast – Allowing users to customise display settings for better readability.
- Easy Navigation & Simplified Language – Using plain English and intuitive design to enhance usability.

- **Support for Financially Vulnerable Customers**

- Flexible Payment Options – Enabling customers to set up affordable repayment plans directly through the portal that are in line with client forbearance and payment options suitable for the sector.
- Instant Live Chat Assistance/Hand off to live voice agent – Providing real-time support for customers struggling with payments or account management.
- Proactive Alerts & Notifications – Sending early intervention messages e.g. payment reminders or missed payments.

- **Enhanced Security & Privacy**

- Secure Authentication – Implementing multi-factor authentication to protect vulnerable customers from fraud.
- Privacy Controls – Allowing customers to manage consent preferences for data sharing and communication.

10 Employee Support & Wellbeing

Dealing with customers in vulnerable circumstances can be emotionally challenging. Supporting our Employees is critical to ensuring they can deliver fair and empathetic outcomes for customers while protecting their own wellbeing.

Our commitments are:

- **Training and Preparation**
 - All Employees receive vulnerability, empathy, and resilience training as part of induction and annual refreshers.
 - Training includes practical techniques for managing difficult conversations and handling emotional disclosures.
- **Managerial Support**
 - Line managers conduct regular check-ins with team members to discuss challenging cases and offer guidance.
 - Leaders are available for live call support and escalations when agents are handling distressing interactions.
- **Debriefing and Peer Support**
 - Employees can debrief immediately after difficult calls to reduce emotional impact.
 - Peer support sessions and buddy systems are encouraged to share experiences and coping strategies.
- **Access to Professional Support**
 - Employees have access to an Employee Assistance Programme (EAP) and can request confidential counselling or mental health support.
 - Management will make reasonable adjustments to duties where prolonged exposure to distressing cases may impact wellbeing.
- **Culture of Care**
 - We encourage an open culture where Employees can speak up if they are struggling emotionally. Supporting our people is essential to sustaining high-quality, empathetic customer service.

11 Version Control

#	Date	Author	Summary of key changes	Approvers
5.0	15/09/25	Ceri Chatham		
6.1	11/11/25	Nick Allen	Removed non- relevant material. Material additions generally, including: • greater detail on Special Category data • Added POA, LOA and carers. • Aligning against the Vulnerable customer procedure.	Martin Pearson
6.2	13/01/26	Nick Allen	Refinements following MP review. Revised disclaimer on page 1 to reflect that this is a FSUKL not FSL document. New paragraphs in: • Section 1 explaining how to apply the policy. • Section 2 to whom the policy applies.	Norton Rose for review
6.3	19/01/26	Nick Allen	Refinements suggested by Norton Rose review	FSUKL Board