DISCLOSURE ENVIRONMENTS

Encouraging consumers to disclose a mental health problem

Guide one in a series on mental health disclosure

Chris Fitch, Dan Holloway and Conor D'Arcy

November 2022

Contents

About the authors

Chris Fitch is Vulnerability Lead at the Money Advice Trust and a Research Fellow at the Personal Finance Research Centre, University of Bristol.

Dan Holloway is a disability activist, Co-convenor the Futures Thinking Network at The Oxford Research Centre for the Humanities, CEO and founder of Rogue Interrobang, a spin-out of the University of Oxford.

Conor D'Arcy is Head of Research and Policy at Money and Mental Health.

The series represents best practice guidance but does not constitute legal or regulatory advice.

Introduction

Being a consumer with a mental health problem can be difficult.

This is because services and companies – like banks, energy suppliers, or mobile providers – don't always understand the needs that people with mental health problems can have (which can span challenges from communication, interaction, decision-making, to concentration).

This means getting what you need from these everyday services can be much, much harder. It means using up energy, effort and time trying to get these essential services working for you.

And it means lives that could have been spent living, become an everyday grind of just getting by.

Disclosure

Disclosure has been seen as one way to break this grind. This is based on the logic that if consumers simply told firms about their mental health problems, those organisations would have the information needed to deliver relevant help and support. However, such reasoning can fall short where it:

1. **makes the consumer solely responsible for disclosure** (rather than sharing this with firms)
2. **overlooks the fact that most consumers with mental health problems do not disclose** (due to unaddressed practical barriers or perceptions of negative consequences)
3. **distracts from the actions a firm should take once a disclosure has been made to them** (including how staff should initially manage these, and 'how far' firms should go with support)
4. **frames disclosure more as a technical process rather than a human interaction** (where upset, frustrated and scared consumers disclose to firms in hope of positive change)
5. **neglects how the 'data footprint' left behind by disclosure will then be used** (including whether firms or consumers should control how how this data can be used)
6. **sees disclosure in isolation – rather than as part of a wider strategy of linked actions** (where disclosure sits alongside journey design, identification and support options).

Consequently, while disclosure represents a well-known and widely adopted strategy among firms, little consideration has been given to what actually 'works' to underpin such a strategy.

Three guides

For these reasons, Money and Mental Health and the Money Advice Trust have collaborated on three disclosure guides, informed by evidence summaries and new research.

- **Guide One** is about **disclosure environments**. Outlining the fundamentals of disclosure, this guide explains how firms can encourage consumer disclosure of mental health problems.
- **Guide Two** is about **responding effectively to disclosure.** This guide describes what makes for a 'successful disclosure' in technical and human terms.
- **Guide Three** is about **data**. This covers the encoding of disclosure into data to support consumers. It also considers the balance between firms wanting to record data to protect consumers from future harm, and consumers wanting to control what is recorded about them.

Section one

UNDERSTANDING DISCLOSURE

Disclosure is a critical moment

Disclosure is where something private and personal is shared about someone.

This guide is about disclosures made by people with mental health problems to essential service firms (such as energy suppliers, telecommunications providers, or financial services companies).

The guide's focus is on increasing consumer disclosures to individual firms.

Critical moments

Disclosures are critical moments of:

1. Trust and risk for the consumer

The decision to share information about a mental health problem is often accompanied by:

- hope this will lead to a positive change in circumstance, support and outcomes
- fear it may not be taken into account, not properly understood, or even used against them.

2. Opportunity and judgement for staff

Consumers may disclose a situation just once. Staff therefore need to:

- act in the right way when disclosure occurs (to avoid losing vital insights)
- handle often difficult issues and circumstances with empathy and care
- do this in line with commercial and regulatory aims.

3. Success or failure for firms in ensuring consumers are supported if a disclosure is not correctly handled:

- customers may not get the help needed in the short, medium, or long-term
- firms may lose the opportunity to both take a disclosed situation into account, as well as stop a future problem growing
- outcome measures may differ for vulnerable and other consumer groups, rather than being 'as good' as one another (as some regulators have indicated should be the case).

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

Consumer on the decision to disclose their mental health problem

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

Frontline staff on handling a disclosure

"If we've got that information available to us and document it, that ensures that we help support our customers appropriately… I think it just goes back to providing the right support."

Senior leader on the value of disclosure

Regulators require firms to encourage disclosure

Consumers with mental health problems want greater understanding and support – that is clear. And all regulators expect firms to use disclosure to achieve this.

FCA

The Financial Conduct Authority (FCA) – which regulates the financial services sector – expects firms to understand their consumers' needs. It highlights encouraging disclosure as an important step towards securing that understanding. In its finalised vulnerability guidance, the FCA also notes that "firms should ensure that they are open and transparent…about how any information disclosed will be used." [1]

> "Firms should… set up systems and processes in ways that will support and enable vulnerable consumers to disclose their needs."
>
> *FCA, 2021*

Ofgem

In their 2019 Vulnerability Strategy, the Office of Gas and Electricity Markets (Ofgem) – which oversees energy firms – set an outcome for firms to demonstrate they had made it easier for consumers to 'self-identify' or disclose vulnerability. Importantly, specific reference was made to consumers with mental health problems being able to self-disclose. Ofgem add that "companies need to build trust and make sure that consumers are not penalised for self-disclosing." [2]

> "We want to see evidence that there has been an improvement to support consumers to self-identify."
>
> *Ofgem, 2019*

Ofcom

The Office of Communications (Ofcom) regulates companies providing telephone, mobile, broadband, postal and other services.

In its "Treating Vulnerable Customers Fairly" guidance, it recommends that firms do more to encourage consumers to disclose their situation and support needs. It also notes that the signals and messages that firms send to consumers are key: "customers might be more willing to share information about a vulnerability if they know they can get extra support from their provider by doing so." [3]

> "Providers should encourage customers to tell them about any specific accessibility or customer services needs they have."
>
> *Ofcom, 2020*

Ofwat

The Water Services Regulation (Ofwat) have made regular statements about the need for firms to better identify consumers in vulnerable situations (including those with mental health needs). In their "Practitioners' pack for water companies", Ofwat note that encouraging consumers to disclose any vulnerable circumstances could provide a helpful strategy for firms. [4]

> "It is useful to encourage customers in circumstances that make them vulnerable to disclose their need."
>
> *Ofwat, 2016*

Current approaches are not encouraging disclosure

Despite regulators' expectations, only a minority of consumers with mental health problems disclose to firms.

Uncertainty about its consequences, twinned with firms not offering reassurance and opportunities for disclosure, lie at the heart of this.

Only a minority disclose

Recent research by Money and Mental Health has found that only a minority of people with mental health problems disclose this to essential service firms.[5]

This means available support that could have been given to many of these consumers was left on the shelf.

Anticipation and response

In the next section of this guide, we detail existing and new research on the barriers that stop people from disclosing.

These are underpinned by two driving forces:

- **consumer views** about making such disclosures (spanning if this is possible or welcomed by firms, through to potential negative consequences of doing so)
- **firm inaction** in countering such perceptions (by not offering spoken and practical reassurance about consumers' concerns, or providing routine opportunities for disclosure to take place).

This latter point is key. While consumers will always draw their own conclusions, firms can shape these by creating an environment where it is clear (i) that disclosure is welcomed, (ii) what actions will follow a disclosure, and (iii) it is simple to disclose at any point in time.

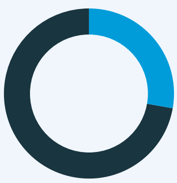
11% disclosed to a water company

12% disclosed to an energy firm

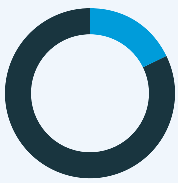
13% disclosed to a telecoms firm

14% disclosed to a financial service firm[5]

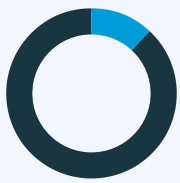
Consumer beliefs about mental health disclosure:



28% believe disclosure will make no difference



18% are embarrassed to disclose to firm



12% think firms won't believe my disclosure[5]

Disclosure environments could help overcome this

A disclosure environment aims to achieve three crucial objectives.

1. **By routinely sending signals to consumers that indicate both that disclosure is welcome and show how disclosed information will be used, firms will help lift barriers to disclosure.**
2. **By building-in simple opportunities for disclosure across their channels, journeys and platforms, firms will make it easier for consumers to make disclosures at any point.**
3. **By encouraging and facilitating disclosure from onboarding onwards (so consumers' support needs are known – and met – from the outset), firms will prevent difficulty and harm, as well as support consumers more effectively and consistently.**

So – how can firms go about building a disclosure environment?

Section two

BUILDING A DISCLOSURE ENVIRONMENT

Understand and remove the barriers to disclosure

The first step in building a disclosure environment is for firms to identify and appreciate the reasons why consumers do not disclose, then to use this insight to remove the barriers related to this.

While such reasons will differ across firms and sectors, our research found five common barriers. This section outlines each of these in turn and offers guidance on how to overcome them.

To do this, we draw on data from 34 qualitative interviews with consumers with mental health problems and frontline staff and senior management in firms, alongside quantitative survey data from the Money and Mental Health Research Community. Further details are given at the end of this guide.

a. Fear of financial harm

The most common reason given for non-disclosure was the fear that a person's access to credit, services or welfare benefits would be lost once a firm knew about their mental health problems:

> "I purposely didn't tell them [about the mental health problem]… I was thinking, 'That's gonna cut off the supply and they'll cut the credit limit."

> "You don't know whether… [firms are] gonna freak out and say, 'Oh yeah, we don't want to deal with this,' and… close all my accounts."

These fears were greatest when firms didn't make it clear what would happen if consumers did disclose. Here, consumers filled this vacuum with their worries and concerns:

> "I thought they might… take me to court and… say I shouldn't have borrowed the money in the first place."

> "I have a joint account with my husband and our mortgage is joint as well, and I don't want my mental health issues to in any way impact him either."

Understanding the barrier

Such fears typically exist where firms do not actively offer reassurance or explanations to consumers about what happens when a disclosure is made.

Firms need to therefore communicate to consumers – across all channels – that (i) their disclosures are welcome, (ii) what will happen if a consumer decides to disclose, and (iii) what will *not* happen (to counter fears about any perceived negative consequences).

Removing the barrier

Case Study 1 describes how Barclaycard created a 'Money Worries' website to help communicate these type of messages to consumers. The Barclaycard website uses case studies to explain what will 'happen next' if a customer decides to disclose information about their situation.

Using examples ranging from redundancy to addiction, the website also includes a case study that illustrates how a customer ('Ruth') was helped after disclosing a mental health problem.

Firms should think about how they can send signals like this for different parts of their operation.

CASE STUDY 1: BARCLAYCARD – 'MONEY WORRIES' HUB

Barclaycard wanted to help more customers learn about the support that was available to them. They also wanted more customers to feel able to make disclosures to them, including those that involved sharing information about their mental health situation.

Being aware of the barriers that can exist to such disclosures, Barclaycard created the 'Money Worries' hub (www.barclaycard.co.uk/personal/customer/money-worries). This hub spotlights a range of common circumstances that customers might be experiencing (ranging from job loss and relationship breakdowns to bereavements and mental health problems).

Each is presented in a 'story' format, with this clearly explaining how these situations and problems can be addressed by Barclaycard, and what can happen when a disclosure is made.

Ruth's story

Ruth's story is about mental health problems. This explains how Ruth took the steps to explain to Barclaycard the situation that she was facing, and the response and support she then received. This aims to illustrate to other customers how they will be treated if they made such a disclosure.

Taking this story-based approach for Ruth, but also for other customers such as Carl (redundancy) and Tomasz (accident), the Money Worries hub simply aims to provide customers with knowledge of what will happen, and what might be gained, if they made a disclosure to Barclaycard.

b. Lack of opportunities

The lack of clear and accessible opportunities to disclose was also seen as a key barrier.

Some consumers were simply unaware they could make such disclosures to firms. For these people, it hadn't occurred to them a firm would want to know about this, and they hadn't received signals from firms to make them aware this was possible.

More participants, however, talked about wanting to make a disclosure, but not having an accessible way through which to do this. For these, the requirement by many firms to disclose via the telephone was as an obstacle, as their mental health problems made telephone calls not just difficult to make, but impossible:

> "Suppose I could write but, you see, I have no idea who to write to. You know, at one stage you could write a letter and you'd get a response, but these days it all seems to be call centres and what have you and… it's a way that I can't handle."

As participants noted, this meant that even regular communications from firms encouraging contact often rang hollow because there was no accessible way they could do this:

> "You know, they do say, 'well, do try and give us a call and let us know,' but that's the last thing on my mind."

Importantly, staff and leadership in firms immediately recognised these barriers. Here it was noted that channels other than telephone need to be opened-up for disclosure.

> "there's some people who go, 'Actually, I want... to do this [disclosure] over SMS, 'cos I feel like I can open up. It's not embarrassing or… 'I'm on the bus."

> "what we are developing at the minute…is that, via the app… customers… can register their vulnerability… [and] what then support they then need"

Such an approach was supported by consumers with mental health problems. Here many people wanted a system that allowed them a choice of channels for disclosure from onboarding onwards:

> "I don't… think it should be part of the application process… Instead [I] think it's maybe something that [you] could just… fill in, in your own time, whenever you want."

Understanding the barrier

Alongside signals encouraging disclosure, routine opportunities for disclosure need to exist. These opportunities should be clearly promoted, allow a choice of channels for disclosure, and be offered so consumers can disclose at any point in their relationship with a firm.

Taking such an approach can ensure disclosures are made at the earliest possible point allowing relevant support needs to be known about, understood, and met from the outset (rather than only coming to light during disclosures made at later points of crisis).

Removing the barrier

Case Study 2 describes how Lloyds Banking Group added a "select your support options" feature to their current account dashboards. This allows customers to use their banking app or online account to indicate support needs relating to letters and statements, choose how Lloyds Banking Group communicates with them and select adjustments that are required for in-branch appointments.

CASE STUDY 2: LLOYDS BANKING GROUP – OPTIONS FOR SUPPORT

Lloyds Banking Group gives customers the option to disclose their needs in person, over the phone or online. These can be recorded and shared across the Group, to ensure the right support is available. This also means customers don't need to repeat conversations which they may find difficult.

Through online and mobile banking, Lloyds Bank, Halifax and Bank of Scotland customers can choose from a list of support options.

To recognise the importance of understanding individuals' circumstances, customers with other or complex needs can speak to a colleague who will record their needs and explore how to help.

The options that customers can log online include:

- letters and statements – customers can choose the format that works best for them – such as large print, easy read, Braille, and Audio CD
- communication methods – customers can choose the best way to communicate with them. This includes options for those who have a speech difficulty or use British Sign Language
- in-person appointments – customers can choose various needs, including mobility support needs or lip-reading or speaking.

c. Damage from data

Some consumers did not disclose due to concerns about how their data would be used.

Following a disclosure to firms, consumer disclosures often become data: entered into computer systems, used to set flags, and shared (internally and potentially externally) with the aim of giving consumers a 'better service'.

For some consumers, this 'data legacy' was a barrier to disclosure, sparking worries about how their data might be used and shared:

> "[Where's] that information gonna go? Is it gonna go on your credit file? Will it go to be shared with other people, because these organisations have opportunity to share this data with so many different people, don't they? [Y]ou don't know where it's going… It's sort of there for life, isn't it?"

People also worried – often in the absence of information or explanation from firms – about this disclosed data having a 'life of its own', being shared with other organisations, and potentially creating future problems for them:

> "What are they actually going to do [with it]? Are they going to stop your card from working all of a sudden… [*Laughing*] Are they gonna have a contact number for your psychiatrist[?]"

Understanding and removing these barriers

In Guide Three (Data and Disclosure), we examine the legal and regulatory options around disclosure data. The guide explores how firms can use disclosures about mental health and support needs to help their consumers, and the importance to consumers of control and choice over how their disclosed data will be recorded, used and shared. Unless firms strike the right balance, many consumers may be deterred from making such disclosures.

d. Anticipation of judgement, disbelief and pity

Some consumers did not disclose as they felt firms would morally judge or not believe them:

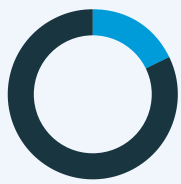
> "I suppose you feel like a bit of a failure… and… I suppose you start to tell yourself that, if you…call whoever, whichever creditor… they're going to be, you know, disappointed in you, which is odd because they don't know you from Adam."

> "You… assume people think you're making it up…or, you know, out for all you can get…"

For some individuals, these fears were linked to their own attitude towards their mental health problems (and how comfortable they felt in sharing this with others). Others, however, worried more about the anticipated reaction of firms and staff, and not wanting to feel judged, seen as a liar (or someone trying to 'game the system'), or being pitied.

18%

of survey participants are embarrassed to disclose to firm[5]



Understanding and removing the barrier

Again, the signals that firms send to consumers to encourage disclosure are key. These should aim to normalise disclosure by explaining that many customers already share such information with firms, that staff are well-used to such conversations, and that many staff will have experienced periods of poor mental health themselves. Such approaches will need to be underpinned by staff training (as explained in Guide Two) to ensure disclosures are responded to in a professional but human way.

e. It's "not worth it"

For many consumers, disclosure was simply seen as not being 'worth the effort'. For some this was due to a general scepticism about the underlying motives of the companies involved:

> "I don't think there's a bank out there… that would truly care about mental health if there wasn't a, a bottom-line monetary issue for them."

> "they're not interested in little people… [T]hey aren't sympathetic… with people who've got mental health problems… and I just thought, 'Well, do I want to… go through that and then find out nothing's happened?"

Other consumers, however, reached the same conclusion because of their previous experiences of making a disclosure, where nothing had practically changed following the disclosure:

> "I don't think I would disclose it again… That's just from my personal experience. I don't think I benefited from it. I didn't feel… that it made any difference at all."

> "when you've had those sort of repeated experiences… you get burnt and… you are a lot more wary about what you say to people."

Notably, many consumers with mental health problems talked about the energy and effort required to make a disclosure in the first place. Here the prospect of making a repeat disclosure (either to the same firm, or tellingly to entirely different firms) could be deterred by a poor first experience.

28%

of survey participants think disclosure will make no difference[5]

Understanding and removing these barriers

- It is essential that firms are upfront – with themselves and consumers – about the type of support they can and cannot provide following a disclosure. This is important both before a disclosure is made, and also during the process of receiving a disclosure (and we consider this further in Guide Two).
- Firms need to ensure staff have the skills, confidence, and backing to act on disclosures made by consumers. This can only happen where staff have received sufficient training, and quality assurance and performance monitoring systems reinforce these competencies.

Create and improve pathways to disclosure

The second step in building a disclosure environment is creating pathways for consumers to share.

Our research with consumers and firms identified five actions that are key to this. This section outlines each of these in turn and offers guidance on how to introduce these.

a. Support strategies: clear, consistent, realistic

Before any pathway to disclosure can be laid, firms need to recognise why they are doing this: to know their consumers' support needs so these can be met wherever relevant and possible. Consequently, firms need to establish exactly what support they can (and cannot) give to consumers once a disclosure has been made. Known within firms as 'treatment strategies', these need to be clear, consistent, and realistic:

- **clear** – a person's mental problems can make it much harder for them to choose, purchase, access, use, communicate about, pay for, benefit from, or go without a product or service. Firms need to clearly explain to staff how to meet support needs in these key areas.
- **consistent** – where firms encourage consumers to disclose certain types of support needs, they should ensure these needs are consistently met across all future contacts with the firm or transparently explain where and why this may not always occur.
- **realistic** – there will be support needs that firms do not have the expertise and resources to meet themselves, where signposting to external organisations will be required instead. Firms should therefore explain what support they can give themselves to consumers at the earliest possible point, and make it clear what external support could supplement this.

Without taking these steps, firms may increase the number of consumer disclosures they receive but find themselves unable to meet or address the needs that are then disclosed.

b. First contact: onboarding

The earlier that firms know about consumer support needs, the sooner they can meet them. Despite this, firms often overlook the opportunity for disclosure offered by the onboarding process.

Clearly, it would be unrealistic to expect a potential consumer to disclose a vulnerable situation or support need during an application for a product or service. This is because a consumer is probably not going to want to share any information they perceive might be used as a basis to decline their application.

However, once a firm has accepted a potential consumer's application, an important opportunity arises. Here, as shown in Figure 1, it is possible to give a consumer the opportunity to share any relevant support needs or important information about their situation (most likely by allowing them to select from a list of core support options).

Figure 1: Onboarding – building in a disclosure moment

Pre-application

As part of the standard description of the 'features' of the account, service or product that a firm can provide, customers are told about the types of support that can be provided.

Application

No questions are asked about support needs during the application.

Onboarding

Welcome!
Your account has been approved.

We want you to get the most out of your account.

We can provide support to help you do that.

This might be receiving your statements in Braille.

It could be more time to respond to our questions when you phone us.

Or it could be something else that we can help with.

You can view and select the help we can provide here.

A lot of customers are already receiving this help.

So please tell us if you'd like it too.

And remember:

Your account has already been approved.

Nothing you tell us about your support needs will change that.

And any future applications you make to us won't be affected.

Your information

We will only use this information to help you.

Our Privacy Policy explains this in full. You can read it here.

This explains how your information is used. Who will see it.

And how long we keep it for.

After onboarding

Customers are routinely reminded that they can share their support needs with a firm. Onboarding **should not** be the only stage where disclosure is sought and encouraged.

c. Routine contact: give an option to disclose

Every contact with a consumer is an opportunity for disclosure.

Whether it is a standard letter, an annual review, an online account dashboard, or a telephone or in-person conversation, firms should consider two factors: (i) is this an opportunity to remind a consumer that mental health or other disclosures are welcome ('sending the signal'), and (ii) if so, is there a process to allow the consumer to make that disclosure ('providing the mechanism')?

For **written communications**, doing this could involve including information which explains a firm already helps many consumers who have disclosed support needs related to their mental health (and other difficulties), and describes how such disclosures can be made. Similar approaches have been taken with consumer financial difficulties, where firms have included information in standard letters on how to access free debt advice services.

For **online contact points**, sending signals and offering mechanisms for disclosure could mirror the approaches outlined in Case Studies 1, 2 or 3. However, it is vital that consumers are made aware on website landing pages or main journey pages that such opportunities exist – rather than being hidden away in settings features, or having to be searched for.

For **telephone or in-person conversations**, staff often already ask consumers if there is 'anything else that they can help with today' (after the consumer's main objective has been completed), and a reminder about disclosure could be included here. Equally, recorded messages in telephone waiting/queuing systems could also include messages that normalise, welcome, and encourage disclosure.

CASE STUDY 3: PHOENIX GROUP AND COWRY

Encouraging disclosure: emotional benefit and sense of control

In work with the Phoenix Group (covering the Standard Life, SunLife, Phoenix Life, and Reassure brands) and other firms, Cowry Consulting have used behavioural science to encourage consumers to disclose their support needs. During this, two key behavioural science principles have helped achieve this:

1. Emotional benefit – people often care more about benefits than features. This is because benefits display their value and worth more clearly (known as Concretisation). Consequently, making reasons for disclosing feel tangible and personal can enhance the value of what this really means for the customer. For example:

Don't say: "It allows us to keep these details on file for the next time we have a conversation"

Do say: "It saves you time and hassle in the future. This can be important, so you aren't repeating yourself to other colleagues."

2. A sense of control – sometimes customers in difficult financial or health situations report feeling 'like passengers in their own life' with little control over what is happening to them (known as a higher external Locus of Control). Therefore to engage such customers and encourage disclosure, firms should highlight the autonomy and control over their personal information, and stress their ability to make choices for themselves.

Example: "You have the power to amend these details at any time in the future".

d. Remembering humanity and transparency

Many interviewees pointed to staff kindness, authenticity and ‘simply being human’ as the reason why they decided to disclose to firms.

Here the actions of frontline staff – in their tone and warmth, or through the way they sensitively probed or asked questions – were crucial.

Critically, as staff interviewees noted, such engagement and connection couldn’t be forced or ‘acted out’. Instead, it came from staff showing a consistent interest and concern for a consumer’s wellbeing and situation.

People with mental health problems also pointed to the importance of transparency during such contacts – regardless of channel – with a value placed upon being given clear explanations on how their disclosed information would be used, stored and potentially shared.

e. One consumer, multiple firms

Most consumers will have relationships with multiple firms. This means that a consumer's decision to disclose to an individual firm will often hinge on two factors. First, how many barriers to disclosure have been removed in that firm. And second, how many pathways to disclose has that firm also created.

However, a larger challenge also exists. As consumers have relationships with multiple firms, systems need to be developed which allow consumers with mental health problems to disclose their support needs to multiple firms through a single process or platform.

The reasons for this are outlined in Case Study 4: Dan's story, where the challenge and consequences of consumers having to repeatedly disclose their support needs are starkly illustrated.

Taking this step – and ensuring that the process, platform or system for making such disclosures also attends to what consumers want to experience and achieve in doing this (see Guide Two) – would enable more consumers to get on with living their lives, rather than using up precious time and energy in making repeated disclosures to multiple firms.

Critically, this illustrates the need for essential service firms to collaborate to create a 'wider disclosure environment' spanning multiple firms. Here a recognition needs to emerge that while individual firms should always improve their own systems to better encourage disclosure and meet support needs among their customer base, that only a co-ordinated approach can ultimately overcome the barrier of practically disclosing to multiple firms.

CASE STUDY 4: Dan's story

Every repeated disclosure steals a week of my life

I have bipolar disorder and ADHD. This means there are things I find very hard or impossible that others find inconvenient, or at worst, just don't notice.

Two of these things are phone calls and task sequencing. This makes it almost impossible for me to access many essential services where the default communication is by telephone, or I have to use multi-factor authentication to access vital documents or account details.

Many people on the other end of an email or webchat, or in a store, simply don't understand. So I have to spend a huge amount of time explaining. Other people think they do understand because they find these things "a bit inconvenient." And you can feel the judgement, of them thinking, sometimes saying "why can't you just cope with it like everyone else does".

Trying to interact with services that most people take for granted means having to make this kind of disclosure. Every time. That could be trying to access my GP or getting vaccinated; arranging delivery for something I've ordered online; trying to communicate with my electricity provider. And it's not just the experience itself, which is often traumatising, reminding me of being bullied or denied access in the past; making me give intimate medical information just to do something many do without thinking.

As well as that, every time I do this I have to prepare myself in advance so I can cope with that trauma. I need to do research to find out how I can make arrangements to ask for something accessible. I have to run through the scripts in my head to deal with replies from people who don't get it or don't believe me. And afterwards I feel distressed and exhausted. Not "tired." But unable to function. Sometimes for days. Every repeated disclosure steals a week of my life doing this.

And of course if I need to interact with two firms that week, one of them has to get ignored. So bills will go unpaid. Or I will buy something more expensive from a different firm. If something is broken, I don't return it. And I never get to switch providers. This makes a huge financial impact. But it also means I miss out on doing the things other people get to do. The things that give their life meaning. Because I'm too busy preparing for or recovering from another disclosure.

Section three

RECOMMENDATIONS

What actions should firms take?

Firms need to recognise the barriers to disclosure:

- consumer fear of financial harm
- a lack of opportunities for consumer disclosure
- absence of explanation on how disclosed data are used (including consumer control over this)
- consumer worry about being judged or disbelieved
- disclosure being perceived as not 'worth the effort'
- staff missing or overlooking disclosures
- impact of poor disclosure experiences on future decisions to disclosure.

To overcome these barriers, firms need to create and grow pathways to disclosure by:

- being clear on the support they will give in response to disclosure
- creating opportunities for disclosure from onboarding onwards
- signalling that disclosures are welcome during routine points of contact
- remembering that humanity and transparency encourage disclosure
- supporting initiatives to help consumers disclose to multiple firms via a single platform.

Importantly, many firms are already taking action to welcome, normalise and effectively respond to disclosures of mental health problems – Guides Two and Three in our series consider this further.

Aligning disclosure policy with other actions

Disclosure is an important pillar of any consumer vulnerability or mental health strategy. But it cannot be the only pillar – and no firm should rely on consumer disclosure alone.

This is because not every consumer with a mental health problem will disclose this to firms.

Some consumers will not be aware they have a mental health problem, many may not be able to disclose due to a lack of opportunity, while others may decide to keep information to themselves.

It is therefore important that firms have strategies that allow for the support of people experiencing difficulties in accessing/using services who would not otherwise disclose.

As part of this, firms might also adopt design processes that anticipate and 'design-out' the harms or problems that people with mental health problems may encounter in routine consumer journeys, and again overcome the need for reliance on disclosure.

Conclusion

Disclosure is a critical moment where something private and personal is shared about someone.

These are important moments of trust and risk for the consumer. They are situations of opportunity and judgement for staff. And they can mark the difference between success and failure for firms in ensuring consumers get the support they need, and the outcomes that regulators expect.

As this guide has explained, building disclosure environments that encourage, signal and welcome, normalise and act-upon consumer disclosures of mental health problems are key.

In Guide Two we therefore address the next question: how should firms respond to customer disclosures?

Methodology

Interviews

Thirty-four telephone and in-person semi-structured interviews were conducted with frontline staff (n=13) and leadership in debt collection firms (n=7), and people with experience of mental health problems, debt, and debt collection (n=14).

Lived experience participants were recruited through an advertisement sent to selected members of Money and Mental Health Policy Institute's Research Community. Frontline staff and leadership participants from debt collection firms were recruited from one large sized firm, one medium sized firm, and two small sized firms. This firms were randomly selected using a sampling frame constructed for a separate quantitative survey study that is described further in Evans et al (2018).[6]

Interviews were conducted between December 2019–February 2020, qualitative data analysis ran from November 2020–February 2021, and write-up took place in 2021.

Survey

Money and Mental Health commissioned Opinium in 2021 to ask 5,001 adults (aged 18-65) who had experienced mental health problems about their lives, the largest ever representative online survey about money and mental health. The results of this survey are published in the Money and Mental Health report, 'The State We're In' (2021).

Acknowledgements

With a huge thanks to all the interview and survey participants who shared their time, insight, and experiences with the research team. And with additional appreciation to Jamie Evans and Sharon Collard (Personal Finance Research Centre, University of Bristol), Claire Henderson (Institute of Psychiatry, Psychology and Neuroscience, King's College London), and Rob Bell and Colin Trend for their support in the work, research, and thinking underpinning this series of guides.

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