

Treating vulnerable customers fairly: moving from lip service to action

Since regulators first introduced the idea of treating vulnerable customers fairly – how far have organisations actually come?

And what has the impact been on those vulnerable people?

Are organisations doing enough?



# Is your organisation putting money where its mouth is?

The reality is that whilst there has been a great deal of talk about treating vulnerable customers fairly, this talk isn't yet translating into real action.

Yes, firms are taking steps and there are pockets of best practice, but existing guidance on the 'fair treatment of vulnerable customers' is open to interpretation and the lack of a stick in the form of fines, means that identifying and treating vulnerable customers fairly is still very much in the form of lip service.

For real action to take place, the issue needs to move beyond words to deeds at the boardroom table.

According to the FCA's Financial Lives research, 27.7 million adults in the UK now have characteristics of vulnerability such as poor health, experiencing negative life events, low financial resilience or low capability.

Complaints are also on the rise around the mis-selling of credit and services, and the unfair treatment of vulnerable customers – all amplified by the pandemic. In talking to people across industry sectors, there are increasing concerns about the scale and impact of vulnerability and real worry that if firms don't start to get their house in order to better identify, check and support vulnerable customers – the vulnerability crisis is the next PPI scandal in waiting – but one that won't just impact financial services alone.

#### **About this report**



In this report, we share the key findings of our independent research to shed light on the stark reality of the unfair treatment of vulnerable customers in the UK today. The simple fact is that too many vulnerable people are experiencing unfair or insensitive treatment, causing detrimental and – in some cases – devastating impacts on their lives.

This report is for organisations looking to go beyond the talk, committees and inaction, and move towards taking real action on vulnerability to drive improvements in the way they identify and treat their vulnerable customers.

**Helen Lord,** CEO of the Vulnerability Registration Service



We believe that the only way to effectively address the issue is through greater data sharing and better identification. Banking and financial services, mobile phone providers, housing and local government and others must start to share data where they know vulnerability exists. And they must start carrying out vulnerability checks just as rigorously as they carry out credit, fraud and affordability checks.

There is a clear consensus that this is the right thing to do. But it's time to turn good intentions into practical actions that safeguard the most vulnerable in our society. The consequences for not doing so can be catastrophic for the individuals concerned. It's important to remember that behind every vulnerable person statistic is an individual struggling to cope with everyday life. It's the duty of responsible organisations to do everything possible to support those individuals and prevent unnecessary distress.



#### Headlines

According to the Vulnerability Registration Service research:

- Over a third of the UK population consider themselves vulnerable nearly 18 million people in the UK\*
- Women are more likely to consider themselves vulnerable 38% of women compared to 29% of men
- Two in five (41%) vulnerable customers feel unfairly treated by organisations\*\*
- **15% of the UK adult population** find it difficult communicating with organisations, and one in four vulnerable customers still spend between one and six months trying to make organisations aware of their vulnerable circumstances
- One in five (20%) vulnerable customers have continued to receive calls, emails or visits chasing up payments or for debt collection.

This report is based on independent research conducted on behalf of the Vulnerability Registration Service by Censuswide. 2,004 nationally representative UK adults were surveyed during July 2021.

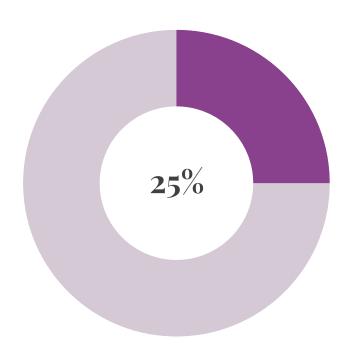
### What do we mean by 'vulnerable' customers?

The FCA defines a vulnerable customer as someone who, due to their personal circumstances, is especially susceptible to harm, particularly when a firm is not acting with appropriate levels of care.

Vulnerability is a broad category, encompassing physical disabilities, mental health, cognitive disorders, financial difficulties, capacity and accessibility.

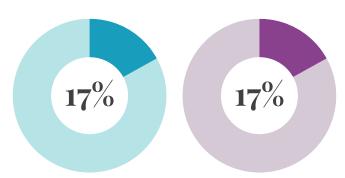
#### **Key findings**

**13.1 million (25%)** people have experienced mental health struggles within the last 12 months.



#### In the past year:

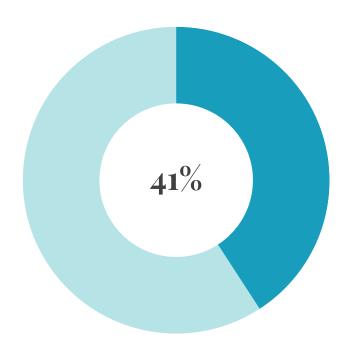
**9 million (17%)** people say they struggled to cope with finances and managing money.



**8.8 million (17%)** people have been impacted by a life event such as the breakdown of a relationship, bereavement, or a job loss.

#### Unfairly treated:

**41%** of people who fall into the FCA's own 'vulnerable customer' definition, say they have been treated unfairly by organisations such as banks/financial services, utilities, mobile phone providers, housing and local government.



### Missed payments and further borrowing:

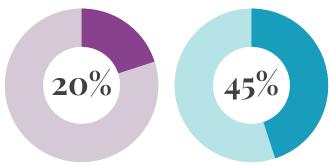
**18%** of vulnerable customers have missed payments or gone into arrears.



**14%** have taken on further borrowing/ debt as a result of being vulnerable or falling into vulnerable circumstances.

### Chasing vulnerable customers:

One in five (20%) vulnerable customers have continued to receive calls, emails or visits chasing up payments or for debt collection.



**45%** of vulnerable customers have experienced mental distress after being chased for payments.



Sometimes a person's vulnerability may lead them into circumstances where they cannot pay. People who are the victims of illegal lenders (loan sharks) will prioritise repaying the loan shark above anything else, because of the threats and coercive control they use to gain power over people. Being able to identify this vulnerability and refer people to the appropriate support is the first step in helping them regain control of the finances and their lives.



**Cath Wohlers,** LIAISE Manager, England Illegal Money Lending Team

### Are you treating your customers fairly?

Vulnerability is certainly a hot topic, and increasingly mainstream as an issue, but behind all the talk and good intentions, the reality is that 41% of vulnerable people say that they have been treated unfairly. It is also very concerning that one in five (20%) of vulnerable customers have received calls, emails or visits chasing up payments or for debt collection, with 45% of vulnerable customers experiencing mental distress after being chased for payments.

Nearly three in five vulnerable customers are spending in excess of two weeks trying to make organisations aware of their vulnerable circumstances as a result of major life events.

**41%** of vulnerable people say that they have been treated unfairly

# Revealing a vulnerability to an organisation isn't easy

15% of the UK adult population have found it difficult communicating with organisations – speaking on the phone, accessing the internet or physically visiting branches or outlets.

Amongst those experiencing vulnerability, this situation is even more acute. 57% of vulnerable customers spend more than two weeks\*\*\* trying to make organisations aware of their health circumstances – increasing to 71% amongst people with low levels of knowledge and confidence in financial matters, as well as low levels of English language or literacy skills.

**15%** of the UK adult population have found it difficult communicating with organisations



It's not surprising to read that one in four vulnerable people spend between one and six months trying to make organisations aware of their vulnerable circumstances.

Here at IE Hub, we have the same values as the Vulnerability Registration Service, and we believe in a 'tell it once' approach to affordability. Most customers have to fill out multiple Income and Expenditure assessments (I&Es) before a payment plan can be set up, while simultaneously, creditors struggle to validate the information from customers' various I&Es.

On both sides, the current system is inefficient, costly, and can cause a huge amount of stress to vulnerable individuals. Organisations need to take responsibility for their processes, and invest in a robust digital transformation. It's time to step away from the dated excel sheet exercise.



Dylan Jones, CEO, IE Hub

# Vulnerable people being passed from pillar to post

When vulnerable customers have informed organisations about a vulnerability, the experiences have been mixed. 29% found it difficult to locate the right person or department to talk to. For 32% of these respondents, they were passed around to different people or simply kept on hold or subjected to automated messages. 37% found it difficult to have to keep repeating their circumstances to different departments within different organisations.

"Disclosing a vulnerability shouldn't be so hard and the way an organisation responds shouldn't be such a lottery. It is heartening that there are pockets of good practice, but there now needs to be consistency across the board. Behind these statistics are vulnerable individuals who have already reached a limit on how much they can deal with."

Helen Lord, CEO, Vulnerability Registration Service

One of the most difficult parts of being in a vulnerable situation is having to keep repeating the same story over and over again, sometimes repeatedly to one company, but often to many different companies.

#### Is it worth the effort?

Amongst those that wouldn't tell an organisation about a vulnerability, either their own or on behalf of someone else, one in four people (24%) said it was because they didn't think it would make a difference.

However, 29% said that when they told the organisation about a vulnerability, it was acted upon and they were provided with help and support. 30% said that there was empathy and they were treated like a real person.

29% said that when they told the organisation about a vulnerability, it was acted upon

#### A vulnerability mindset

"A key part of enabling disclosure from those who are vulnerable is ensuring frontline staff have the skills and mindset to effectively engage with and support vulnerable customers. While it is important that staff are trained to spot, probe and encourage disclosure, a focus on helping people see disclosure as a positive action, rather than one with negative consequences, is vital.

"Being able to identify true vulnerability from those who simply won't pay or are fraudulent is vital to ensure people are treated fairly. This must happen at the earliest possible stage to ensure that the right resources are focused on the right actions."

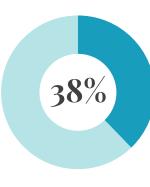
Helen Lord, CEO, Vulnerability Registration Service

**30%** said that there was empathy and they were treated like a real person

### Top five reasons and barriers to customers disclosing vulnerability:



#### The impact on vulnerable customers



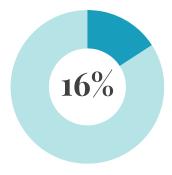
**38%** of vulnerable customers say they have been impacted emotionally, experienced worsening mental health, stress or left in distress as a result of vulnerable circumstances



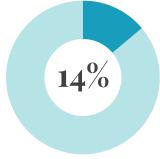
**45%** of vulnerable customers have suffered further mental distress after being chased for missed payments



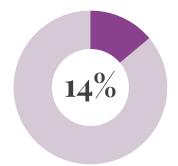
**18%** have missed payments or have gone into arrears



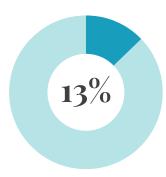
16% have missed utility bill payments



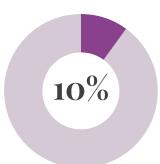
**14%** have taken on further debt/borrowing



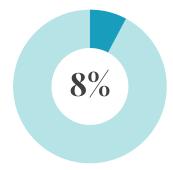
**14%** have missed council tax bill payments



**13%** have missed loan/credit card payments



**10%** have been evicted, subject to a repossession or put at risk of homelessness



**8%** have missed mortgage/rent payments

It's widely acknowledged that mental illness and debt often go hand in hand, but the onus is still on those suffering to manage it with their creditors.

Mental illness can greatly impact the ability to make responsible decisions, communicate with companies and manage financial matters.

People with mental health and debt issues are reluctant to talk to their providers about their circumstances, often until it's too late. A key deterrent is the stress of contacting each and every provider to explain the same painful story, often multiple times.

What we do know is that, if people are vulnerable, they have a higher propensity to fall into debt. If we owe money, it is highly likely to make us feel overwhelmed and frightened – and the whole situation can easily spiral out of control.

"We must make it easier for vulnerable customers. The onus must be on organisations rather than the other way around. Organisations have to be proactive and take steps at an earlier stage to ensure the circumstances of those with mental health problems and in debt are not worsened."

**Helen Lord,** CEO, Vulnerability Registration Service

It is also important to recognise that vulnerability doesn't just impact the individual. When asked 'has anyone in your family been in a vulnerable circumstance in the last 12 months, such as a life event i.e. relationship breakdown, health condition, job loss etc.,' 36% of people said yes.

**21%** of people have been impacted by Covid

**17%** of Brits struggled with or are struggling with finances and managing money

#### **Pandemic impacts**

According to the FCA, the Covid-19 pandemic has left over a quarter of UK adults (27.7 million) with 'characteristics of vulnerability' a 15% increase since the FCA completed its Financial Lives Survey the previous February, when 24.0 million displayed characteristics of vulnerability.

According to our survey, 21% of people have been impacted by Covid-19, with people aged 16-24 the most impacted (31%) compared to people aged 55+ (13%). 17% of Brits struggled with or are struggling with finances and managing money.

We haven't yet seen the full impact of the pandemic, but it is on the horizon with the ending of payment holidays, lifting of furlough, shortening of notice periods and increasing evictions, increased chasing of payments, rising food and fuel prices, the removal of the Universal Credit uplift, higher energy costs, and national insurance hikes – the list goes on and on.

Organisations need to be prepared for a potentially overwhelming increase in vulnerability and ensure that they are able to best identify and support vulnerable customers.



The contents of this report and survey, alongside numerous other similar recent publications on UK consumer vulnerability, is a call to action for organisations.

I'd like to start by saying that having worked in the consumer finance sector with lenders and service providers for the best part of the last decade, it was genuinely heart-warming to see how businesses, regulators and the government reacted to support the people in need during the pandemic.

The return to business as usual has been something we have all been striving for with good reason, but the reality of the situation is that we are much closer to the start than the finish when it comes to identifying and supporting consumer vulnerability.

From a regulatory perspective the FCA have made it very clear that they expect

more from firms, most recently visible from
their Financial Lives Survey. Unsurprisingly
they have highlighted use of high-cost
credit as a segment for focus. This should
not be a broad brush approach, but if we
look into the detail here we have seen
some worrying trends from our own
IDVU data which supports the findings
of the Vulnerability Registration
Service survey.

In October alone, following the raft of changes to government backed support such as furlough, universal credit and the end of payment holidays, our IDVU database identified:

- 729,000 individuals making high-cost credit applications
- 92,000 making high-cost credit applications who had not been seen before

- 10,000 making high-cost credit applications to pay household bills
- 6,000 applications from individuals stated as newly unemployed
- 2,000 applications to consolidate debts.

There is no silver bullet, but the resources are there to support firms who want to take this seriously and we're pleased to be partnered with organisations, such as the Vulnerability Registration Service, to support this. We know from experience that the FCA, rightly or not, are not averse to taking retrospective action, and those who chose to turn a blind eye, or stick their collective heads in the sand do so at their own risk.



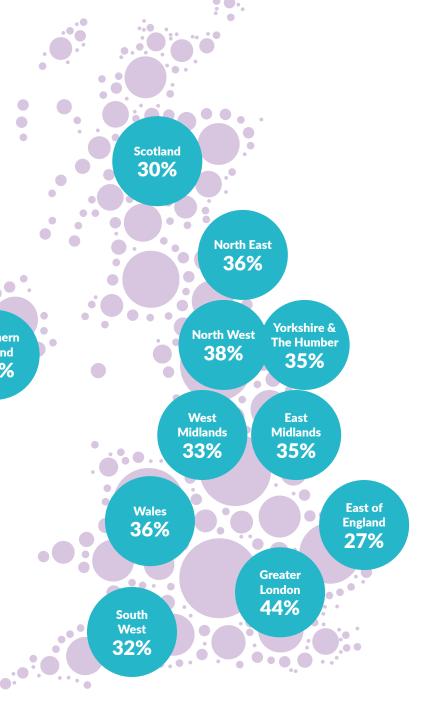
**Simon Gregory,** Sales Director, Data On Demand

### 3.2 million young adults are vulnerable

People aged 16-24 are among those most likely to consider themselves vulnerable – 48%, compared to 34% of all Brits. 45% of this age group have experienced a deterioration of their mental health due to their vulnerable circumstances. 2 in 3 vulnerable young adults are being offered further borrowing, gambling or payday loans. 53% of people aged 25-34 consider themselves vulnerable.

### Vulnerability by region and employment status

People in Greater London are more likely to consider themselves vulnerable closely followed by people in the North West. By employment **Northern** status, 77% of people Ireland 31% that are unable to work consider themselves vulnerable, 45% of those unemployed and currently looking for work, 40% of those who classed themselves as a homemaker/full-time parent, 35% of those working part-time (up to 34 hours). In contrast, only 15% of retired people consider themselves vulnerable.



# Vulnerability by gender and employment status

**38% of women** consider themselves vulnerable, compared to **29% of men.** In terms of type of vulnerability:

By the FCA's 'Vulnerable Customer' Definition	All	Male	Female
<b>HEALTH:</b> mental or physical health conditions or illnesses that affect the ability to carry out day-to-day tasks	<b>27</b> %	24%	30%
<b>LIFE EVENTS:</b> major life events such as bereavement or relationship breakdowns, job loss	19%	17%	21%
<b>RESILIENCE:</b> struggles to withstand financial or emotional shocks (financial distress/mental health/difficult to cope)	15%	13%	17%
<b>CAPABILITY:</b> knowledge of financial matters or low confidence in managing money, or poor English language or literacy skills	12%	12%	12%

In terms of income, people on £15,000 of less (40%) are most likely to consider themselves vulnerable.

As a result of their vulnerability, 41% of women compared to 33% of men say that they have been impacted emotionally with worsening mental health.

This increases to 48% amongst those earning £15,000 or less. 30% of vulnerable customers in this income bracket have continued to receive calls, emails or visits chasing up payments or for debt collection, compared to 20% of vulnerable customers overall.

#### **Industry breakdown**

As part of this research, we asked for people's thoughts and experiences in relation to organisations within the following sectors:

- Banks/financial services
- Utilities
- Mobile phone providers
- Housing and local government.

Here are the highlights and key findings:

People are least likely to tell their mobile phone providers about their vulnerable circumstances – 31% followed by utility providers such as gas, electricity and water providers – 28% of people haven't told before and wouldn't tell

- People said they felt most uncomfortable talking to their banks or mobile phone providers, 31% respectively
- Of those who have told organisations about their vulnerable circumstances, but wouldn't tell again housing (council and/or housing association) fared the worst 16% indicating there is still much to be done in this sector
- vulnerability with **local government** (council tax and benefits) and would do so again we are finding that local councils are amongst the most proactive in signing up to and using the Vulnerability Registration Service.

Amongst the respondents that identified as falling within the FCA definition of a vulnerable customer, 18% have missed payments, 16% have missed utility bill payments, 14% have taken on further debt and borrowing, 14% have missed council tax bill payments, 13% have missed loan/credit card payments and 8% have missed mortgage/rent payments.

Some sectors, such as **utilities**, have taken great strides towards identifying and supporting vulnerable customers – but there is still much to be done. The regulator Ofcom recently fined an energy supplier £1.5 million for failing to treat customers fairly. It is worth noting that vulnerability for the individual does not end once 'one' organisation has played its role.

Vulnerability is a cross-sector issue. Creating an environment that 'encourages and enables' disclosure, as well as taking practical action to better identify and share data on vulnerable customers, are essential next steps.

If one company is told about an individual's situation, they can share that with all the other companies that person deals with, taking away much of the pain of them having to go over and over it again.

#### What is holding your organisation back?

According to our research, 63% of people agreed that they would complain if they felt that they, or a member of their family, was unfairly treated because of a vulnerability. Regulatory fines are increasing, and the ramifications of reputational damage cannot be ignored. Organisations should demonstrate what actions they have taken. They will increasingly be held to account and expected to ensure the fair treatment of vulnerable customers.

In talking to organisations, many are holding back because they do not know how to identify vulnerability – even though this challenge can be easily overcome. Others, very surprisingly, don't think they have any vulnerable customers. To some, the barriers are the perceived cost, the worry that they will open the floodgates. Some organisations are awaiting more prescriptive guidance, that is unlikely to be forthcoming.

Data protection is also another barrier to processing data on vulnerability. We are seeing organisations tie themselves up with data protection for fear of breaching it. But done right, this doesn't need to be the case. There are points within GDPR, for example, that allow the processing of this data.



We all face an unprecedented period of consumer vulnerability and, as consumers expect more than ever from their service providers, businesses now have the opportunity respond in a way that will change the nature of business/customer relationships for the better and forever.

The firms that embrace this regulation, invest in the right training and technology, and are recognised for doing so, will be seen as progressive, customer-centric companies of the future that are fair, compassionate, and inclusive.



**Chris Jones,** Co-founder and Director of Support, VCX



The data and technology now exists to make the protection of vulnerable people far easier than it has ever been.

The Vulnerability Registration Service has highlighted the regulators requirements and set out a clear way to meet their expectations.

Organisations need to consider their role in protecting people – they just need to have the corporate will to make it happen.



Sam Manning, CEO, Hope Macy

# Your customers need and want support

Our research shows us that customers are actively looking for support.

People want organisations to be more proactive in identifying vulnerability.

Despite a reluctance on the part of many in making organisations aware of their vulnerability themselves, 63% would share details of their vulnerability if they were asked. Furthermore, 67% of Brits believe organisations should be proactive and carry out checks to identify the vulnerable.

People want organisations to be more proactive in identifying vulnerability

#### **Data sharing**

Nearly two in three vulnerable adults (65%) would consider registering with a free service if it took on the task of flagging their circumstances on their behalf to other organisations.

64% would consider letting details of their vulnerability be shared if it meant that they were better supported and treated fairly.

### Steps to take

It is important to recognise that tools already exist to identify vulnerability. You can't begin to treat vulnerable people appropriately or extend support to them unless you know who they are.

The Vulnerability Registration Service is a powerful starting point as it is the only central database that flags known vulnerabilities.

#### Other steps to take include:

- Address the barriers to disclosing vulnerability (internally and externally amongst customers themselves)
- Train and support staff to have a vulnerability mindset so they are better able to listen, spot the signs and provide support, and help customers understand the positive impact on them if they disclose
- Encourage greater data sharing and the use of existing tools to better identify vulnerable customers at the earliest opportunity. Work in partnership with other organisations

- Make it easier for people to disclose
   a vulnerability and obtain the
   support they need through better
   signposting to resources and by being
   open and transparent about the
   support that is provided
- Signpost clients to sources of support, such as relevant charities and other third party organisations, that can support them further
- Keep learning and improving understanding vulnerability is key.

64% would consider letting details of their vulnerability be shared if it meant they were better supported



The Vulnerability Registration Service survey results give a stark reality on how much work there is still to do by businesses to embrace fairness and compassion towards vulnerable customers. The pandemic has exposed how perilously close we all are to unforeseen life events, illnesses, and mental stresses that can put us into situations where we need extra support from our service providers.

Staff training on vulnerability needs to focus on what connects us in our vulnerability, not what separates the fortunate from the less fortunate.

Specialist training is essential for customer service colleagues having conversations of disclosure around customer vulnerability. However, unless the organisation fully commits to supporting those front-line staff, as well as its customers, then those front-line staff are at risk of becoming emotionally overwhelmed. Before organisations deploy staff training on vulnerability, they need a wider assessment of their internal support structures.



**Chris Jones,** Co-founder and Director of Support, VCX



At Aryza we support the work that the Vulnerability Registration Service is undertaking to raise awareness of the situation facing so many vulnerable consumers in the UK. This research is a real eye-opener to the scale and severity of vulnerability in the UK and has some important findings that will help businesses to step up to the task of helping these individuals in an appropriate and meaningful way.

The research has significant parallels with our own research into the UK insolvency market and highlights the complex interactions between debt and vulnerability. We will work with the Vulnerable Registration Service to understand this relationship and identify what can be done quickly to help vulnerable consumers.



Andy Taylor, Chief Marketing Officer, Aryza

### The Vulnerability Registration Service database

Alongside undertaking independent research to survey adults in the UK, we also mapped the Vulnerability Registration Service database to provide further insight into the picture of vulnerability across the UK.

This mapping shows that there is a higher proportion of vulnerable people in the North West that are financially stretched or in 'urban adversity'.

- A significant minority of people registered on the Vulnerability Registration Service database are from 'comfortable' households – 1 in 4
- 14% of people registered are from 'comfortable communities'
- Those registered have very little in terms of a safety net with very little in savings
- High occupancy / culturally diverse family areas are highly represented, as well as pensioners and singles in social rented flats; those in sheltered or retired

- accommodation; people claiming benefits and with a low chance of savings or investments
- There is a preference for traditional communication methods and older registrants are more likely to come from poorer areas
- Internet usage amongst the majority of registrants is below average and they are less likely to engage in online shopping
- Income is generally lower than average larger low-income families surviving on benefits; council or housing association accommodation; socially rented terraced housing; as well as some first time buyers and those with mortgages with a long time to run
- Young adults often single parents who are under the age of 35 with young children; often claiming benefits; high proportion of health problems; indebtedness
- People from urban communities are more widely represented compared to those from rural communities.

The results uncovered during this mapping mirrors the independent research undertaken where we found that younger people, especially in the 16-24 and 25-34 age ranges and people earning £15,000 or less are more likely to consider themselves to be vulnerable.

#### **Conclusion** – Helen Lord concludes:





Vulnerable people are trying to disclose vulnerability to organisations, but many firms are not being proactive and are failing in their duty of care to check for vulnerability – even though this information is available.

The only way to identify and protect the vulnerable from these experiences and further harm is to share data about them across sectors, and make checking for vulnerability a standard practice, like credit reference or affordability checks already are. The tools to make this happen already exist. If organisations truly are serious about treating vulnerable customers fairly, it is time to move beyond lip service to real boardroom action. This is not only the right thing to do from a financial and regulatory perspective, but also morally the right thing to do.

Our mission is that checking for vulnerability becomes standard practice, as normal and as commonplace as a credit reference check or an affordability check. We hope you can join us in making this mission a reality.



### **Acknowledgements** and thanks

We want to say a huge thanks to everyone that took part in this survey, and to the England Illegal Money Lending Team, IE Hub, VCX, Data On Demand, Hope Macy and Aryza who generously contributed quotes.

# About the Vulnerability Registration Service

The <u>Vulnerability Registration Service</u> is a not-for-profit company and the UK's first central vulnerability database. It gives people in vulnerable circumstances a way of sharing this with multiple organisations.

#### It's simple and free.

People can opt either to be pre-declined for financial service applications or add a 'referral flag' to their names to make organisations aware of their circumstances and to take them into consideration.

Organisations can also join the Vulnerability Registration Service as members to access the database to help identify and better support vulnerable customers, including those in financial distress, individuals who have been impacted by the pandemic leaving them in vulnerable circumstances, those with mental health problems, at risk of financial abuse, or victims of fraud.

#### Find out more

If you are an organisation interested in joining the Vulnerability Registration Service, please contact Helen Lord:

Email: helen@vregservice.co.uk

You can also <u>connect with Helen Lord on LinkedIn</u> and find out more by visiting <u>www.vulnerabilityregistrationservice.co.uk</u>

Individuals can sign-up to the Vulnerability Registration Service for free, and are often signposted to the service by charities, credit reference agencies and other third parties.

View the FCA guidance on the fair treatment of vulnerable customers.



#### Methodology

This Vulnerability Registration Service survey was conducted by Censuswide, an independent market research company. Censuswide abides by and employs members of the Market Research Society, which is based on the ESOMAR principles. 2,004 UK adults nationally were surveyed in July 2021.

\*Based on the Vulnerability Registration Service research aligned to the 2019 ONS midyear population estimate figures

\*\*Statistic obtained through combining 'Strongly agree' and 'Agree' answer options

\*\*\*Statistic combines all answer options over and including 'for 2-3 weeks'

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