



NEWS
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The ACPR and AMF encourage financial institutions to continue their efforts to take account of the vulnerability of ageing clients

The joint unit of the Autorité de contrôle prudentiel et de résolution (ACPR) and the Autorité des marchés financiers (AMF) has published a summary of interviews with finance professionals on the progress of their work to take account of the specific characteristics of vulnerable ageing clients when marketing financial products.

In 2021, following the works conducted by their joint unit, the ACPR and AMF called on professionals to exercise increased vigilance with regard to vulnerable ageing people. The follow-up work carried out in 2022 and 2023 shows that, of the fifteen or so banks and insurance companies met, the majority have taken this issue into account. However, the authorities have observed wide disparities in the actions taken.

The main findings of the follow-up work are as follows:

- Half of the respondents have set up a 'Vulnerability' or 'Senior' champion;
- Half have introduced the ability for advisers to seek a second opinion from a line manager or legal, compliance or risk department to implement increased vigilance around vulnerable ageing customers;
- Two thirds of the respondents have set up specific training programmes for advisers;
- Half plan to meet clients at key points in their lives, such as the transition to retirement, to discuss any new needs;
- Almost all respondents use a 'threshold age' above which vigilance measures are implemented in the relationship with the customer.

The "vulnerability champions" in place have a variety of roles: assisting advisers with practical issues, training sales teams, monitoring alerts on ageing customers, reviewing customer files. While there is a consensus among finance professionals on the usefulness of this role, more institutions need to implement it effectively.

The Joint Unit has noted significant progress in the training of advisers, the implementation of practical case studies and the definition and identification of useful criteria for identifying vulnerability. The authorities are encouraging establishments to pursue these actions and make them systematic. However, as advisors cannot be the only shield against the risks of mis-selling, a comprehensive prevention policy is needed. Establishments must also be aware of factual clues that could give rise to a warning and develop an effective prevention policy.

While some establishments have genuinely taken the challenges of ageing into account in their commercial approach and operational processes, others are still merely stating broad principles without translating them into action.

Marketing strategies and sales processes need to take into account the potential vulnerability of ageing customers, based on observed best practices such as systematic consultation with an adviser before any online subscription to complex products, vigilance in updating beneficiary clauses in life insurance policies, a second look by a line manager or a collegial analysis by a discernment committee.

Finally, internal procedures within institutions do not provide sufficient controls on the marketing of financial products to vulnerable ageing customers. Compliance checks are carried out in a limited number of establishments. The introduction of control planning with annual reporting to the governance bodies responsible for compliance risk could make it possible to monitor professionals' practices more effectively.

The ACPR and the AMF have also observed some interesting initiatives in the search for technological solutions to detect vulnerabilities and protect individuals. They encourage professionals to draw inspiration from them in order to develop a commercial strategy that respects the interests of customers.

Read more

- [Summary of bilateral interviews conducted by the ACPR and the AMF on the progress made by institutions in taking into account the marketing of financial products to vulnerable elderly people \(in French only\)](#)

□ About the AMF

The AMF is an independent public authority responsible for ensuring that savings invested in financial products are protected and that investors are provided with adequate information. The AMF also supervises the orderly operations of markets.
Visit our website <https://www.amf-france.org>

□ About the ACPR

The Autorité de Contrôle Prudentiel et de Résolution is the administrative authority operationally attached to the Banque de France that supervises the banking and insurance sectors and ensures financial stability. The ACPR is also responsible for protecting the customers of the supervised institutions and carries out the mission of fighting against money laundering and the financing of terrorism. It also has resolution powers. The ACPR's operational departments come under its General Secretariat. Visit our website <https://acpr.banque-france.fr/>
