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Vulnerability and trauma-informed approaches

SLIDE 1 – Title

Good morning, everyone. My name is Adrie and today I'm going to talk you through vulnerability and trauma-informed approaches.

SLIDE 2 – About me

I'll briefly tell you a bit about myself and how I became a trauma-aware content specialist.

I've been writing content for four decades. I'm Dutch. I started as a cub reporter for my local newspaper, where I quickly learned that the best way to get people to open up is to listen. I did my first government digital project in 1987 for the Dutch State Publishers, before spending over two decades as an editor for print, broadcast and online media in the Netherlands and the UK. That was a time when my content on international accounting standards and corporate finance was regularly quoted by the Wall Street Journal, Reuters and others, which was nice. I thought that's what I would be doing for the rest of my career.

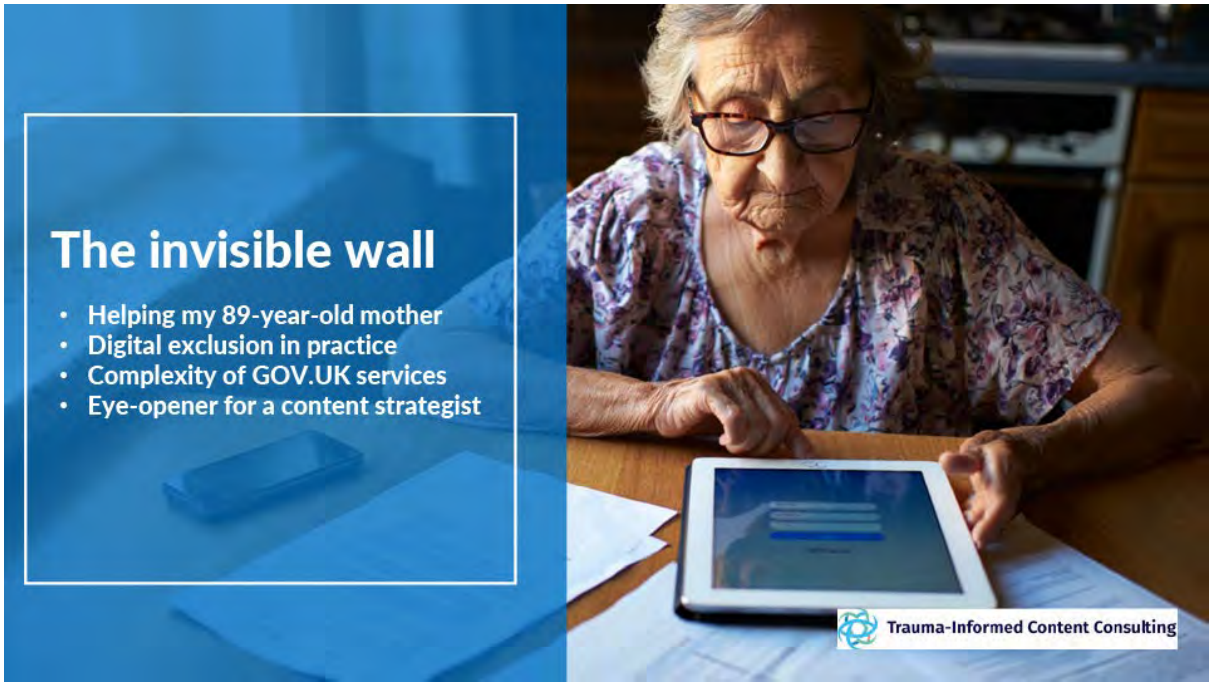
That all changed in 2012, when I secured my first job in content design and was given responsibility for all online content for Universal Credit. That was the same year that the Government Digital Service (GDS) was launched, so talk about being thrown in at the deep end! We were able to pioneer the first government standards for transaction content.

We spent most of our time trying to work out how to create scalable user journeys and defending our use of plain English to very sceptical civil servants. There was little or no discussion about vulnerable applicants at that time.

Since then, I've worked on lots of online content, including trauma-informed projects for the Cabinet Office, Cancer Research UK and the national drink and needle spiking advice and information service for Police.UK and the Metropolitan Police. Content where you have to get it right first time, because people's lives rely on it.

In fact, every month, more than ten million people rely on my content. What I write can either help or harm people. For me, it's not just a profession; it's a calling, a vocation. I'm at a point in my career where I can help people at their most vulnerable. I don't consider myself an expert, but an explorer. I am very much still learning.

SLIDE 3 - The invisible wall



But last year, something happened that really threw both my career and my professional perspective. My father died after a long illness. I had to take a break to help my mother sort out her taxes, insurance, and other financial matters. My parents had been together for almost seventy years, and for most of my time, my father had been in charge of the finances.

It has been a real eye-opener. Not only to see my mother, at 89, with poor eyesight and limited digital skills, struggling with the same kind of digital services that I helped to design. But to find that I struggle with them as well.

She was sent a letter with a 17-digit security code to check her next bin collection online.

To use any digital service related to her finances, she needs to access the national identity verification service, the Dutch equivalent of GOV.UK One Login. Nightmare!

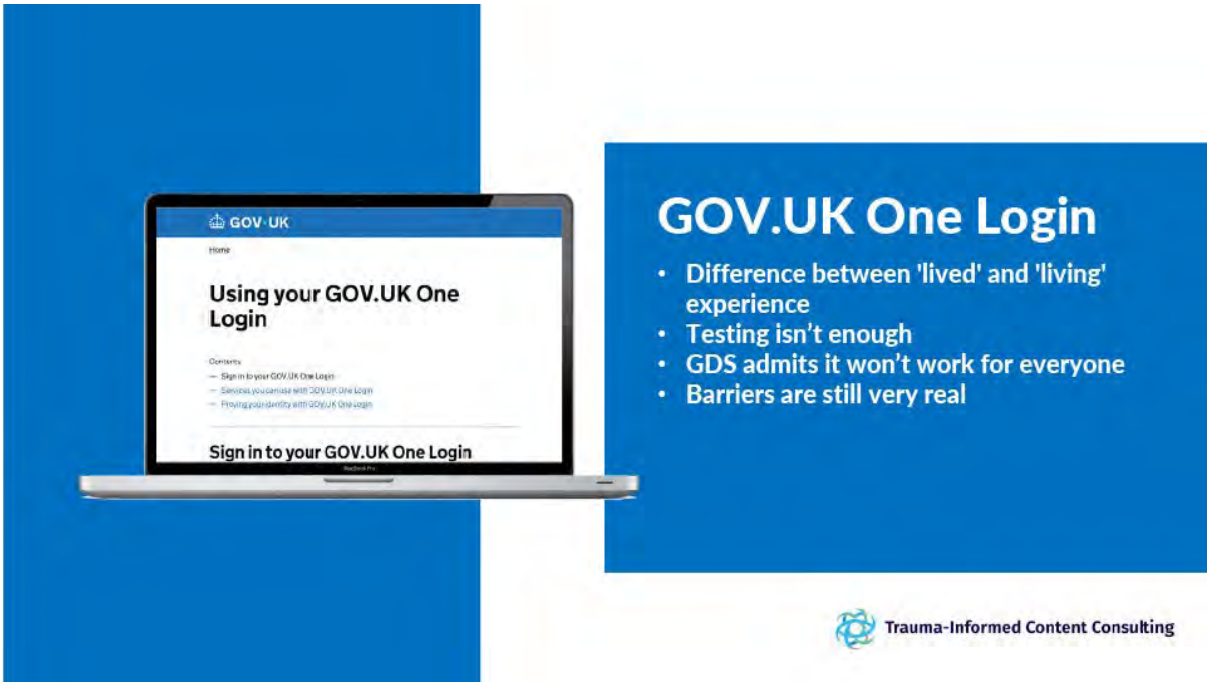
Registering requires three security codes: by email, text message (both time-sensitive, of course), and by post, which arrives within five working days, by which time she can no longer remember what it was for.

To update her old mobile number to her new one on the service, all three options require her to receive a text message on her old phone, which she no longer has access to, because only my dad knew the old number, and she bought a new one instead.

“Don’t worry! Updating your phone number is simple”, the service said. If all else fails, she “just” has to visit her local post office, a journey that involves her having to take a community taxi both ways. “It’s okay,” my mother says. “I will take my mobile with me to my coffee morning next Friday, and one of the volunteers will read out the text message to me.”

Yet those services were designed by people like me, after many hours of user testing, including with carefully selected ‘vulnerable’ users.

SLIDE 4 - GOV.UK One Login



In digital transformation, we often pride ourselves on testing with people who have lived experience. Caring for my mother has taught me the difference between *lived* experience (as 'in the past') and people with *living* or ongoing experience (as 'in the present').

I accept that that is not always possible. We talked to lots of people with cancer at Cancer Research UK, but for the national drink spiking service we couldn't realistically test with people under the influence of drugs or alcohol, for example. But I hope you get my point. Test with people who are going through it right now, if you can. It's fascinating. My mother gets totally confused by cookie popups, hyperlinks that she mistakes for email addresses and such. Stuff you don't usually see in user testing.

The Government Digital Service (GDS) has recently invested hundreds of hours in user research and testing for GOV.UK One Login, including vulnerable users: people with low digital confidence, limited access to technology or complex needs. Their ambition is clear: to create a single, secure way for everyone to access government services online. But even with all this effort, GDS has had to acknowledge that GOV.UK One Login simply won't work for everyone, at least not yet.

And this is the case for many people. Barriers remain. Some people don't have the right ID documents, can't afford internet or don't have the digital skills needed to complete the journey. Others, like my own mother, find the process overwhelming. Navigating identity checks, passwords and security codes can quickly become a source of anxiety and frustration. This isn't just a technical or design issue; it's a lived reality for millions.

Section 2 - Micro-trauma (8 minutes)

SLIDE 5 – Trauma

Now, we will discuss trauma. Let me start by asking: what does ‘trauma’ mean to you?

[EXERCISE]

Trauma refers to any distressing event that causes emotional, psychological or physical harm. The US Substance Abuse and Mental Health Services Administration (SAMHSA)’s definition is that “trauma results from an event, series of events or set of circumstances that is experienced as physically or emotionally harmful and has lasting adverse effects”. It can affect individuals as well as groups, for example, because of war, discrimination or oppression.

It’s important to understand that trauma itself is not a disorder, even though it can negatively impact mental health. Trauma throws people off their emotional and functional balance, often derailing psychological well-being. Common effects include feeling emotionally numb, anxious, irritable, disconnected or overwhelmed.

SLIDE 6 - Considerate content

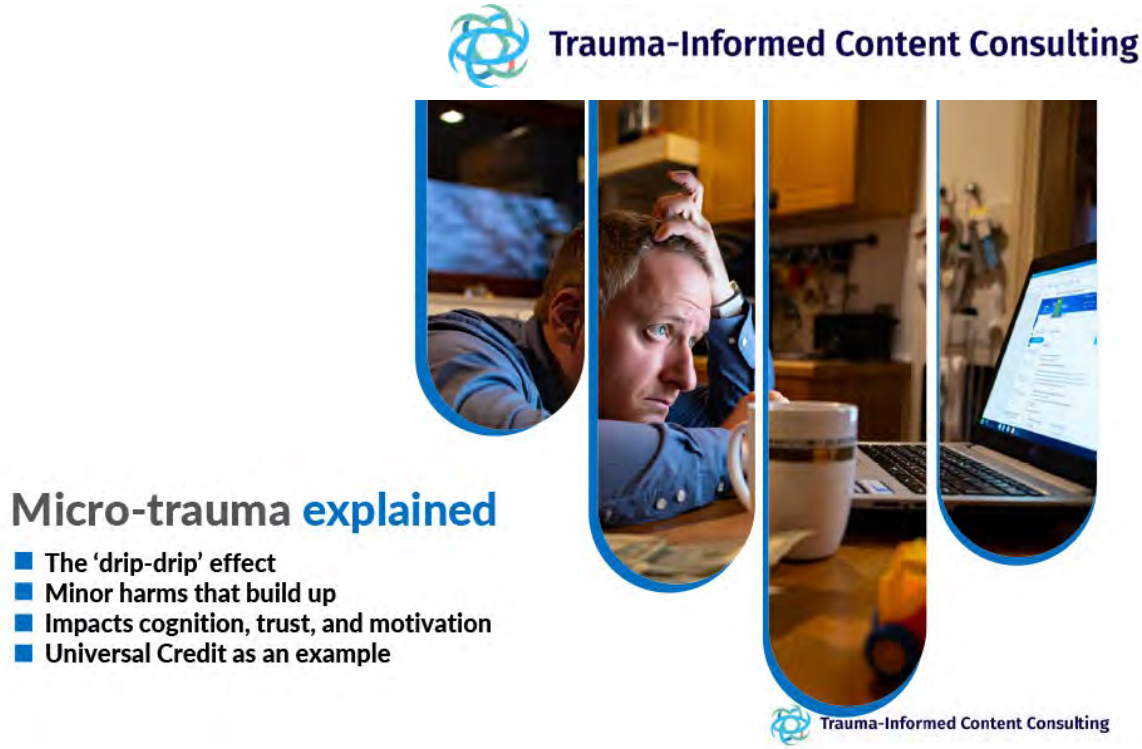
Most of my colleagues who write and talk about trauma-informed services focus on major trauma, often life-changing, such as bereavement, illness, PTSD, a serious accident or a crime. I've worked on services like that too. My colleagues Rachel Edwards and Rebekah Barry have both produced excellent books on what I call 'macro trauma' content.

> Designed with Care, edited by Rachel Edwards
> https://www.designedwithcare.org/
>
> Considerate Content, by Rebekah Barry
> https://contentdesign.london/shop/considerate-content-by-rebekah-barry

But in recent years, as "trauma-informed" language has become more popular in content and service design, it's sometimes been applied so broadly that it risks losing its real meaning and power. Many practitioners talk about trauma without defining it or inviting the audience to interrogate what "trauma" actually means, which can lead to conceptual muddiness and undermine the very goal: providing clarity, safety, and change.

Before we talk about trauma-informed content, let's be honest about what trauma is and isn't. Trauma can mean a life-changing shock, but it can also mean the slow build-up of small injuries or the way a single word flashes someone back to a difficult memory. What it isn't: a catch-all for anything bad, or a label to be thrown around lightly.

SLIDE 7 - Trauma examples



I know 'trauma-informed' has become a bit of a buzzword in some circles. But it's important to keep it grounded: trauma, in the context of content and service design, refers to specific, evidence-based impacts on people's capacity to process information, feel safe and engage with help when they most need it.

Trauma-informed content isn't just a buzzword, at least, it shouldn't be. You'll hear the phrase used in lots of contexts these days, sometimes to mean simply 'gentle' or 'inclusive' design. But trauma has a specific meaning. It's about how lasting emotional or psychological stress alters the way people perceive the world and utilise our services. That's why I always start by asking: what do we mean, here, when we talk about trauma? Because if the word means everything, it has lost its power to change anything.

For this conversation, trauma isn't just about huge life events. It can be that, but it's also the slow wear of minor harms, the drip-drip effect. It matters because it changes how people engage, what they notice, what they remember, and what they're willing to try again. If we keep 'trauma-informed' honest and precise, we keep it powerful. That's why this work goes beyond buzzwords; it's about real, tangible support for people who need it.

If we treat 'trauma-informed' as shorthand for 'just be nice,' we risk missing the ways systems unintentionally exclude, frighten, or overwhelm. That doesn't help anyone. The power is in the detail: noticing not just any harm, but the kind of harm that lingers, drip by drip, or all at once. Trauma-informed content is about meeting people where they are, especially when they're at their most vulnerable. And with AI rapidly reshaping how information is created and delivered, there's both huge promise and huge risk. If we get this right, we can make services more humane, more accessible, and more supportive for everyone. If we get it wrong, we risk amplifying harm at scale.

SLIDE 8 - Micro-trauma

But I also focus on micro-trauma, sometimes called ‘the drip-drip effect’ of small harms, the build-up of small, often invisible barriers or slights that undermine confidence and trust.

Micro-trauma isn’t a sharp, one-off, life-changing event. It’s the drip-drip effect: the slow, steady build-up of small barriers or slights that, on their own, might seem trivial, but together, can fundamentally shift how someone feels and functions.

If you want a physical comparison, it’s a lot like micro-trauma in the body: minor, repetitive injuries, each one barely noticeable at first, but over time, they add up and can lead to real difficulty and pain. We’ve even got a phrase for it in day-to-day life: “death by a thousand cuts.” That’s another way of naming what happens here, an emotional and psychological pain that builds, incident after incident, until someone hits their threshold.

This isn’t just a theory. Culturally and in lived reality, we know that the little things add up. We recognise the “last straw” moment, but the truth is, it’s rarely just the last straw. It’s everything that came before it, quietly stacking up, often unnoticed by everyone but the person experiencing it.

These experiences are often “hidden in plain sight” and may go unrecognised by both the individual and those around them. The impact of micro-trauma is highly personal; what is minor to one person may be deeply wounding to another, underscoring the need for individualised approaches to vulnerability.

For example, enduring constant criticism, rejection, or discrimination, or being subjected to daily stressors like work pressure, can accumulate and lead to a sense of being constantly overwhelmed, anxious, or hopeless.

Over time, the accumulation of micro-traumas can lead to symptoms of depression, such as low mood, lack of motivation and feelings of worthlessness. Individuals who’ve experienced

micro traumas may also struggle with trust and intimacy in relationships and feel disconnected from others.

And here's the crucial thing: You don't need to have gone through a significant life event for micro-trauma to affect you. The accumulation of minor frustrations or moments of exclusion can have a real, negative impact on anyone at any time. For some, a previous shock may make them more sensitive to these everyday harms. However, for many, micro-trauma is the problem.

That means we can't treat micro-trauma as something relevant "only for the most vulnerable". These drip-drip harms pool together, often unnoticed, and eventually leave people feeling overwhelmed, stuck, or left out of systems built to help them. That's why taking micro-trauma seriously, at every stage, for every customer, matters so much.

Small interactions can act as little echoes or bridges back to difficult moments if our designs aren't mindful. GOV.UK One Login is a perfect example of micro-trauma in action: every small barrier, every confusing prompt, every moment of uncertainty adds up, especially for those already feeling vulnerable.

Stress, anxiety and trauma impact the way people consume content and make decisions. In simple terms, the brain activates the 'fight or flight' response and prioritises immediate survival over anything else. The thinking part of the brain can't work effectively, which results in difficulties concentrating, processing information logically, or making sound judgements.

Exercise: List examples of micro-trauma.

(health, finances, child / relative / pet health, relationships, mistrust, fear of technology/authorities, being a carer, wars, emails/notifications, weather, noise, return to office mandates, faulty equipment, etc)

SLIDE 9 - Post-lockdown

The way people process information and engage with services has fundamentally changed since the Covid-19 pandemic and repeated lockdowns. This isn't just anecdotal. ONS and academic studies show a clear, lasting impact on our collective ability to focus, remember and understand content.

During the pandemic, 1 in 3 adults (32%) reported they were so stressed they struggled to make basic decisions such as what to wear or eat (ONS, May 2021). ONS data show that this still impacts many people even now.

A major study from Birkbeck, University of London, found that mental health symptoms in England remained significantly elevated a year after the final lockdown ended. Young adults, remote workers and those experiencing loneliness or pre-existing health conditions were especially affected, with many still struggling to focus and cope with daily demands.

Now, five years later, new studies are revealing what many of us have sensed anecdotally: this wasn't a temporary disruption. It was a profound psychological reset. And not always in ways we've accounted for.

According to the NHS and ONS, a significant number of people in the UK continue to experience symptoms of 'long Covid', which include difficulty concentrating, memory problems and what's often called 'brain fog'. These symptoms directly affect people's ability to process information, manage complex tasks and engage with digital services.

In the UK, teachers and health professionals continue to report significant increases in anxiety and behavioural issues in children who missed critical social development milestones.

In France, where I spend half my time, a recent survey found that over 30% of 18-24-year-olds still report emotional difficulties that started during lockdown and haven't gone away.

In the US, emergency room visits for youth mental health issues remain significantly higher than pre-2020. Among older adults globally, including those in Australia and Canada, levels of digital confidence, social resilience and motivation have declined and remained low.

This isn't about past trauma. It's about ongoing adjustment. People haven't simply returned to who they were before. In many cases, they've become someone else entirely, more hesitant, less resilient, more cautious and more forgetful.

Research published in the British Journal of General Practice and by the NHS confirms that increased stress and anxiety during lockdowns led to measurable declines in mood, memory and cognitive function, particularly among older adults.

SLIDE 10 - Cognitive overload

However, there is robust evidence from the UK that cognitive overload, driven by information overload, daily stressors, and the relentless pace of current affairs, remains a common and significant issue. Over a third of UK adults report daily debilitating stress due to information overload. This includes the pressure to process vast amounts of emails, news, social media, and digital documents at work and in personal life. Sixty-one per cent of people say that keeping track of information from too many sources is a major concern in their daily lives, and 34% say that they struggle to absorb all the content presented to them.

Cognitive overload is increasingly recognised in UK workplaces, especially since the Covid-19 pandemic. It occurs when working memory is over-stimulated by too much information or multitasking, compromising the ability to think, organise and plan. The stress from this overload has tangible effects: 44% say it affects their sleep and relationships, and 35% feel anxious, fidgety and unable to relax as a result. The Stress Management Society highlights that information overload reduces attentional resources, impairs decision-making, and increases regret and difficulty in processing complex tasks.

Micro-stressors, such as small, everyday frustrations like running late, minor mistakes at work, or misplacing items, are reported by 45% of Brits as quietly wearing them down. For younger adults, this figure rises to 65%, indicating a generational impact.

At the same time, 40% of adults with credit or loans said they suffer stress because of their debt, as announced by the FCA in their Financial Lives May 2024 survey. Many organisations will have clients who fall within this 40%, facing not just financial challenges but also emotional and mental strains.

I'm very aware that for most of my career, people had a choice whether to engage with my content. If they didn't like what I wrote in newspapers, on corporate finance portals or business magazines, or they didn't enjoy the current affairs programmes I edited on Dutch national radio, they could turn the page or turn the radio off.

These days, my users don't have that choice. If they want to access benefits or grants, or to register as a childcare provider or report a crime, they must engage with my content. That means that I must get it right the first time, meet them where they are, reluctant and all, or risk not just reputational damage and a loss of trust, but actual harm to people.

SLIDE 11 - GOV.UK, Amazon and Facebook

It's also interesting that, net satisfaction with digital government services has declined over the past decade from 79% to 68% according to the government's blueprint for modern digital government services.

Users' expectations continue to rise as people expect government services to provide the same convenience and personalisation that they see in private sector services. They can see what's possible. They want the government to raise the bar on universality, inclusion, reliability, security and transparency.

I recognise this, because in user testing have long preferred design patterns and language they recognised from Amazon or Facebook. Much as GOV.UK has long tried to do its own thing, based on sound research and experience, people don't really appreciate the design difference and prefer to have everything look and feel the same.

There's a generation gap to address too: today's young adults do not remember a time when most services were not digital. But we still need to deliver on their high expectations in a way that doesn't exclude anyone. Modern digital government should reduce the 'time tax' on people using public services. Not just the time it takes to use a service, but the time to understand what needs to be done. Future services are designed around people: wasting less time, money and energy, and cutting the time that UK citizens spend trying to access public services.

According to the government, public services in future will work for everyone. I hope that someone told GDS. They say that no one should have difficulty using government services - that includes people with disabilities and those who require extra support, as well as those who lack internet access or the skills or confidence to use it. This applies to people across the UK, as well as British citizens overseas. It will be easier for workers, carers, and volunteers supporting those in need to arrange services on their behalf, the government says. How does that make you feel within your organisation? Do you experience similar pressure?

Section 3. Why micro-trauma matters

SLIDE 12 - Micro-trauma and compliance

So, what does all this mean for user experience and micro-trauma? When someone is already struggling to focus or remember information, every small barrier, such as a confusing form, repeated requests for details, or jargon-filled instructions, becomes magnified. What might have been a minor frustration before the pandemic can now be the

tipping point that causes someone to disengage, abandon an application or miss out on essential support.

These 'micro-traumas' are cumulative. For vulnerable people, or those still living with the cognitive after-effects of lockdown and Covid, a single confusing email or a poorly designed digital journey can feel overwhelming and distressing.

Regulators now expect organisations to recognise and address these new, widespread vulnerabilities, not just traditional markers of crisis or disability. The compliance and operational imperatives are clear: if we don't design content and journeys that account for these widespread, long-term impacts, we risk not only losing users but also failing to meet regulatory expectations for supporting vulnerable people in a post-pandemic world.

Looking at the business impact, it drives up complaints, increases drop-offs and erodes trust. It’s costly and hard to spot with standard metrics.

By focusing on micro-trauma, you encourage a shift from viewing vulnerability as tied to specific groups to understanding it as a spectrum that situational factors can influence. This aligns with emerging best practice, which emphasises the importance of context and the need for nuanced, individualised responses to vulnerability.

Micro-trauma insights reinforce the value of trauma-informed approaches, which prioritise psychological safety, empowerment and trust. Micro-trauma insights don’t just support a trauma-informed approach; they strengthen it. They tie directly into the principle of foreseeable harm, which the FCA now expects firms to actively reduce, whether that harm is major, minor, macro or micro.

And here’s what that means in practice: we design to prevent harm, yes, but also to reduce avoidable errors, abandoned journeys, and repeat contacts via chatbot, helpline, or email. When we get this right, we don’t just save people from emotional stress — we also reduce operational pressure. Clearer journeys lead to fewer misunderstandings. Thoughtful content leads to fewer support tickets. A trauma-informed mindset enhances outcomes for individuals and improves the effectiveness of our systems.

Micro-trauma draws attention to how repeated, seemingly minor negative experiences can accumulate and have a profound impact on individuals’ wellbeing. This helps us move beyond a binary or categorical view of vulnerability (where someone is either “vulnerable” or not) to appreciate that vulnerability often develops gradually and contextually, as a result of ongoing interactions and environments.

This aligns with emerging best practice, which emphasises the importance of context and the need for nuanced, individualised responses to vulnerability. The FCA Consumer Duty expects firms to recognise and respond to the changing, contextual nature of vulnerability. It expects firms to recognise and address all forms of customer vulnerability, including small life events that are fluid, hidden or cumulative.

SLIDE 13 - What does this mean in practical terms?

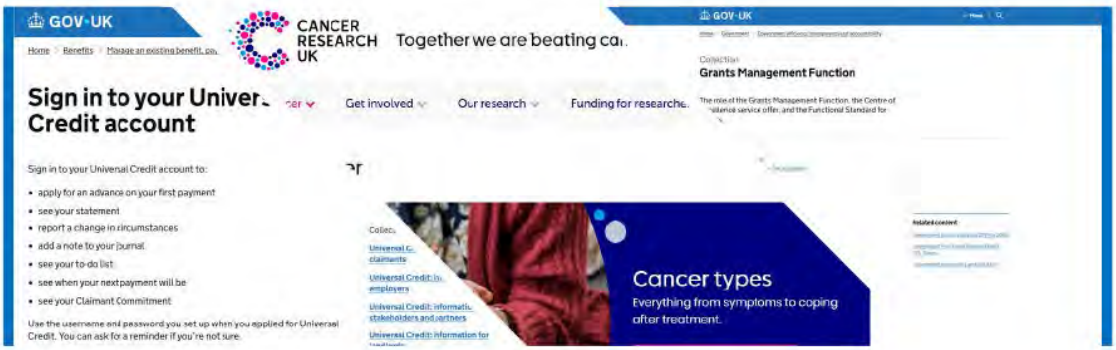
Micro-traumas create neural pathways that shape future behaviours. Users may avoid your service, procrastinate or feel anxious when interacting with similar systems.

In service design, it's tempting to focus on measurable things: drop-off rates, error messages, the extra calls coming into your contact centre. However, we sometimes miss the more profound impact that these micro-barriers have on the people who encounter them. It's not just that people are unable to access a service, or that they disengage and stop trying.

Each small barrier, each confusing prompt or dead end, carries a powerful message that often goes unspoken: You weren't considered when this was built. And over time, that message can pool into something far bigger: a growing sense of being out of place, not mattering, or not being counted. And that is nowhere more evident than in digital services. I see it in my mother. People who are very insecure when using online services, for whom even the smallest barrier confirms their lack of confidence and sense of being excluded.

SLIDE 14 – Cognitive accessibility case studies

Real examples



Trauma-Informed Content Consulting

Universal Credit is a good example. It was designed as a “digital by default” service when I worked on it in 2012, aiming for straight-through journeys that should require no support. But for many people, especially those facing loss, confusion or change, these micro-barriers can be the final straw, telling them, “This system isn’t for you”. That feeling of exclusion is harmful. Left unaddressed, it can erode self-worth and confidence, making people less likely to trust, engage, or seek help in the future.

And people who claim Universal Credit have all sorts of reasons to be experiencing both macro and micro trauma. They’ve lost their job, their income, and their identity. They have lost their confidence, are often in financial difficulties and are experiencing relationship problems. They can’t afford to socialise or provide for their children properly. They feel that ‘the system’ is out to get them, to trick them into giving the wrong answers and pay them even less.

This is particularly important for individuals who may not openly disclose their struggles but are nonetheless affected by repeated, low-level harms. This perspective can help us recognise the importance of creating emotionally and physically safe environments and of giving people more control over their experiences and support.

We need to look for less obvious signs of distress, ask open-ended questions and adopt a more empathetic, non-judgmental stance. For example, ask “How’s your day going?” This is crucial for building trust and for supporting people whose vulnerabilities may otherwise go unnoticed.

Section 4. Case studies: Practical lessons from real journeys

You probably already know the importance of designing services that are consistent, unambiguous and reassuring. Here are some examples of services I have worked on that required a slight adjustment to reach their current stage.

Cabinet Office

When I helped to create rapid, automated background checks on Covid grants for the Cabinet Office during lockdown, our user testing showed that people didn't believe how fast our counter-fraud checks were. In the end, we introduced a little egg timer with a completely unnecessary ten-second delay to reassure users that our checks were thorough.

It shows that even minor tweaks, like allowing people to catch their breath, can dramatically reduce user stress and micro-trauma. It's not always about significant system changes; sometimes it's about respecting the human pace.

Ofsted

When I arrived at Ofsted, there were five separate forms for individuals who wanted to register as childcare providers. Whenever people couldn't understand the forms, the helpline would refer them to a 70-page manual. I discovered that the manual required a post-graduate reading ability. No wonder people were in tears on the helpline. I replaced all of it with a single online form that includes help text, examples, and more. That reduced the time spent on correcting errors by more than 50%.

Universal Credit

At Universal Credit, we were confident that the word "partner" was universally understood. It's short, neutral and widely used. And, despite being locked in a room four days a week with a team of forty experts, I couldn't get our legal team to stop insisting on using a definition for it, because it's central to most of Universal Credit. But when we tested it with users, we realised that it wasn't. People didn't know if it meant spouse, boyfriend, girlfriend, flatmate, co-parent or even ex. Some people thought "partner" was a term that only applied to same-sex relationships. Others worried about giving the wrong answer and getting into trouble. That confusion, just one word, led to mistakes, delays, even anxiety.

And it reminded us: never assume shared understanding. Even the smallest words, in high-stakes contexts, can create enough uncertainty to push someone into panic or silence. That's a kind of micro-trauma, the quiet kind that's easy to miss but heavy to carry.

However, this lesson also applies within our teams. Just as our users didn't all share the same understanding of partner, our colleagues may not all share the same understanding of trauma or micro-trauma. These terms can feel unfamiliar, too clinical, too broad, or not relevant without clear context. And just like users, colleagues may hesitate to ask, because they think they should already know.

Part of this work, whether it's content design or cultural change, is about building a shared language. One that's practical, grounded, and usable in real-world contexts, not just in theory or on paper. Because when language is shared and understood, it opens doors. And when it isn't, even with the best intentions, people get shut out.

Cancer Research UK

When I led the redesign of over 5,000 pages on the Cancer Research UK website, one thing users told us was this: they wanted to feel in control, especially when the topic was emotional or overwhelming.

Instead of presenting people with long walls of information all at once, we used collapsible content, sometimes called “accordions,” that allowed people to open only the sections they wanted, when they were ready.

It’s a simple design choice, but one that has a real emotional impact. For someone looking up symptoms or trying to make a treatment decision, being able to control what they see and when is a small but powerful form of care.

Save and come back later

I have worked on several online services that required different features for a ‘save and come back later’ functionality, tailored to user needs. It’s important to understand how and where people are interacting with your service. That was the same whether I was launching news websites for senior finance directors or designing farm subsidy forms for the Department for Environment, Food and Rural Affairs (Defra).

At Ofsted, for example, applicants were often distracted by other activities while filling out application forms. That means that you need to reassure people by giving them the option to save and continue at some later point.

The same happened - in a more extreme way - when I worked on flood defence funding applications at the Environment Agency. Far from having a time-out function on the application form, we discovered that applications were typically worked on and altered over a period of eleven months before an annual two-week window to apply for funding.

Even then, the application was accepted as a rough estimate, with initial funding allocated to determining the project's cost. We were using the HMRC form builder at the time, which, for data protection purposes, was designed not to save data for more than two or three months. You can see how user research like this affects every aspect of your build.

These are all examples of cognitive accessibility. Chris did a brilliant Vulnerability Matters podcast recently on the cognitive accessibility guidelines (COGA) and I highly recommend it. It is all about designing services that reassure people, help build trust and reduce errors.

> Vulnerability Matters podcast: Episode 44 – COGA - design’s best-kept secret? https://soundcloud.com/vulnerability-matters/episode-44-coga-designs-best-kept-secret

In a world of minimum viable products, champion cognitive accessibility. Use FCA compliance as an argument. Your customers expect better and so does the regulator.

Section 5. The FCA’s non-binary approach & COGA

SLIDE 16 - Taking a non-binary approach

The FCA says that vulnerability is not a fixed label, but a spectrum that shifts with context and life events.

The Cognitive Accessibility Guideline say that designing for cognitive and emotional needs benefits everyone, not just a minority.

As you may have learned from the Vulnerability Matters podcasts, sector leaders are moving beyond "tick box" thinking to flexible, user-centred support. There are clear parallels between COGA's emphasis on user control (for example, letting users choose what to see, how to proceed) and the examples I have given from my own experience, like accordions, egg timers and "save and come back" features.

If industry leaders are embracing cognitive accessibility as a mainstream, evolving practice, it strengthens our argument for moving beyond binary vulnerability models.

COGA's personas and principles can provide practical tools for you to audit and improve your own journeys, showing that the tools for micro-trauma-aware design already exist and are being adopted.

Section 6. When 'good' isn't good enough: Challenging the status quo

SLIDE 17 - Best practice

When 'good enough' isn't good enough

- Checklists won't catch it
- Move from 'special teams' to embedded empathy
- Agile review of journeys

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In a traditional approach to vulnerability, organisations have specialist teams for "vulnerable" customers, as well as scripts and checklists for identified cases and flagged customers. They offer one-off training sessions and static user personas and categories. In a micro-trauma-aware approach that is truly FCA compliant, they have flexible, responsive journeys for all customers.

It is time to expand your thinking; don't leave people behind just because they don't fit a category.

In May last year, the FCA updated its Consumer Duty guidance page with some important points: "Under the Duty we expect firms to actively encourage customers to share information about their needs or circumstances, where relevant. Firms should try to recognise the needs of consumers, whatever channel they use."

What does this mean in practice? The challenge with these approaches is that consumers are typically poor at volunteering information on vulnerability. It's just not something that automatically comes up. Additionally, although trained, many staff only record a vulnerability if it affects how they are dealing with the consumer at that time – and tend to only record severe vulnerabilities.

Also, where firms have reported that they have trained the staff, they have found it difficult to get staff to actively engage with the topic. The topic doesn't stick. This is not surprising – this is a complex area and a new skill for most people.

The result is that many firms are reporting that their proportion of consumers with vulnerabilities in single figures. This is massively problematic. We know that the proportion of vulnerable customers is around the 50% mark for the general population; we also know that everyone is vulnerable at some point. Indeed, the FCA's work shows that, when properly surveyed, the lowest proportion vulnerable customers is around 30% mark, so anyone with percentages lower than this is almost certainly not identifying vulnerability adequately.

And that's before we have even considered micro-trauma, which - as we have seen - is widely reported to affect customers too. The FCA's Consumer Duty guidance is clear: firms must take proactive, ongoing responsibility to identify and support customers with characteristics of vulnerability, rather than waiting for customers to disclose problems or reach a breaking point.

What does that mean in practice for micro-trauma? Micro-trauma often doesn't show up through formal channels, such as complaints, disclosures or vulnerability flags, but the FCA expects you to spot and respond anyway. Here's how that can look in real-world terms:

You must learn to spot the signals in behaviour and experience: Firms must go beyond surface-level data to look for subtle signs of distress or disengagement. This includes:

- Repeated form drop-offs
- Multiple failed login attempts
- Users abandoning tasks during key decision points
- Unusual call patterns (e.g. people calling and hanging up)
- Emotional cues in feedback (e.g. "confusing", "upsetting", "gave up")

The FCA wants firms to act before things go wrong, so customers aren't left to escalate. Let users flag when content or journeys feel stressful. Use micro-surveys or emotion check-ins at key points. Offer "pause and save" or "speak to a human" fallback options. Practical step: Add gentle feedback prompts at key stress points (e.g., "Was this clear?" or "Do you need more time?").

Regularly test content with real users. Provide support for everyone, not just those flagged as vulnerable. Create flexible, responsive journeys that adapt to changing needs. Offer ongoing, real-world training with people experiencing living vulnerabilities. Use personas and journeys that reflect shifting, layered vulnerabilities and micro-traumas, which put customers in charge of what happens next and present options clearly and intuitively. Use consistent and unambiguous language and navigation to create interfaces that validate and reassure users.

It is possible to create services that use language and a tone of voice that truly reflects the needs of people at their most vulnerable, but it takes real time and effort. AI isn't going to do it for you. The feedback I received from victim support organisations on the drink spiking service I created was that the language I had used was "appropriate and victim-focused", giving victims the choice of what to do next all the way through. But that took a lot of testing, rewriting and testing again.

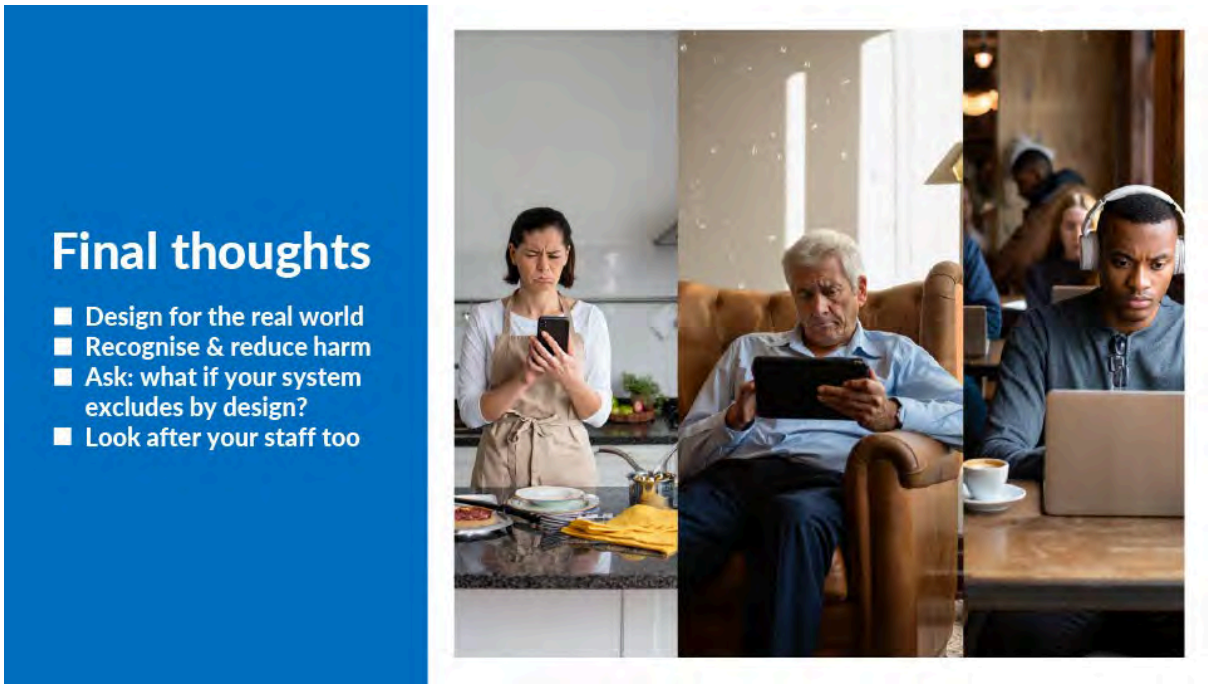
Many organisations have invested in specialist teams and checklists for 'vulnerable' customers. However, this approach can overlook the everyday, situational vulnerabilities that often go unnoticed. Micro-trauma-aware practice means building in flexibility and empathy for everyone, not just those who meet a specific criterion. It's not about abandoning what works but about expanding our thinking, so we don't leave anyone behind just because they don't fit a category.

Most services are delivered as a minimum viable product. If we want to be truly micro-trauma-informed, that's no longer good enough. However, we can utilise an Agile approach

to review existing user journeys again to ensure they serve as many people as possible. Use that opportunity to learn and do better.

And Consumer Duty doesn't just apply to crises. It applies to the moments that get in the way of good outcomes. That's precisely what micro-trauma is: cumulative, invisible harm that builds when journeys aren't designed for the reality of people's lives. Firms need to identify it, design against it, and adapt in real-time.

SLIDE 18 – Final thoughts



Section 7. From insight to action: practical steps

So how do we add a micro-trauma lens to journey mapping and risk assessment?

There are five principles to trauma-informed practice:

1. Safety
2. Trust
3. Choice
4. Empowerment
5. Collaboration

Depending on who you ask, cultural, historical and gender issues may be a sixth trauma-informed principle. This involves recognising the unique impacts of systemic and historical trauma in service environments. It requires us to:

- Educate staff on diverse cultures and their impact treatment
- Be respectful and responsive to different cultural and gender identities
- Acknowledge and include understanding of historical traumas
- Use visuals that represent a wide range of cultures and backgrounds

- Provide services specific to the needs of different gender identities
- Offer materials and services in the preferred languages of clients

Review whether your user journey needs to build in user controls, whether they are technically needed or not: pauses, accordions, “save and come back later”.

Make vulnerability everyone’s responsibility, not just a compliance issue.

Co-design training and content with people experiencing living vulnerability.

Use real-time data and feedback to adapt quickly.

When I worked on Universal Credit, we were challenged to create a ‘digital by default’ service. I typically spent four days a week locked in a room with forty subject experts all day. We would discuss a single question all day, looking at the underlying policy, the language I suggested using and even whether we needed the question in the first place.

We learned that reducing repetitive questions, simplifying language and offering clear support options made a measurable difference: a 70% drop in housing benefit queries, for example and feedback from users who finally felt ‘seen’ and supported. But we never did manage to make it entirely digital by default during my time, because there are always users who need some form of support.

Ultimately, our responsibility is to design for the real world, not the ideal one. And that starts with listening to people with living experience, not just lived experience, and being honest about where our systems still fall short.

It’s also important to stress that without the internet, you cannot access the information. This is worrying because the number of people excluded from digital services is rising. In May this year, Citizens Advice reported that 1 million households disconnected their internet access last year because of rising living costs. 10 million people are unable to access the internet by themselves, according to the Lloyds Bank Essential Digital Skills Benchmark in 2021.

Analysis by Professor Simeon Yates from the University of Liverpool of Ofcom data from 2020 showed that people with limited internet access are:

- 4 times more likely to be from a low-income household
- 8 times more likely to be over 65 years old
- 1.5 times more likely to be from Black, Asian and minority ethnic groups

When you decide to make information digital-only, you exclude people. You will leave them behind.

Last but not least, look after your staff. There are many times when I worked on really traumatising content and I wished that my line manager just once asked me if I was okay, instead of emailing me for progress reports whilst being stuck in meetings.

Section 8. Measuring success

SLIDE 19 - Measuring success

Looking after people with macro and micro trauma is a matter of providing and improving. You can track KPIs, such as drop-off rates, repeated contacts, qualitative feedback or emotional sentiment. But we need to move beyond static “vulnerability” counts to focus on dynamic experience and outcomes.

We need to report improvements to leadership and regulators to show alignment with the Consumer Duty.

The FCA's latest guidance and feedback stress that vulnerability is a spectrum, not a fixed label. Firms must understand that vulnerability can be dynamic and situational, requiring ongoing assessment and adaptation. There is a clear expectation that outcomes for vulnerable customers must be as good as those for other customers, not "separate but equal", but genuinely equitable.

The FCA will scrutinise how business models, staff culture and leadership drive behaviour and outcomes for vulnerable customers. Firms are expected to demonstrate how their actions, culture, and product or service design ensure fair treatment, not just policies or specialist teams.

Micro-trauma-aware practice is not just a regulatory expectation; it’s essential for achieving meaningful and measurable improvements in customer outcomes.

I will leave you with this question: How will you meet your regulatory requirement of moving from a binary approach to vulnerability to a flexible, more contextual approach?

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