

## Vulnerable Customer Policy

### How do we identify Vulnerable Customers?

In order for us to address the needs of Vulnerable Customers we will firstly need to be able to identify them.

There are many risk factors involved including bereavement, illiteracy, illness, disability, or other impairments which increase a consumer's vulnerability.

We remain alert to the signs that the person we are talking to may not have the capacity to make an informed decision regarding the implications of the services/agreement that we are making to them. The Mental Capacity Act says that a person is unable to make a specific decision if they cannot understand information about the decision to be made, cannot retain that information in their mind, cannot use or weigh that information as part of the decision-making process or cannot communicate their decision.

As part of our customer experience we always look out for vulnerable consumers and we aim to help and support them by:

- Training our customer facing staff so they are able to deal with vulnerable customers appropriately.
- Observing and involving other members of staff who can provide help and support.
- Being patient and taking time to listen and facilitate a conversation with the customer so that they fully understand.
- Sharing information with our Partners regarding the customer's current situation.
- Understanding the customer's needs and demonstrating compassion.
- Allocating a familiar primary contact for the customer ensuring consistency and trust.
- Simplifying language so it is clear and easy to understand and avoiding use of industry jargon.

### What do we look for?

In order to identify vulnerable customers, our staff are trained to ask themselves the following questions:

- Do they ask us to speak more slowly?
- Do they understand what we are saying?
- Can they hear the whole conversation without missing bits?
- Are they aware of what is being discussed?
- Are they asking unrelated questions?
- Do they say 'yes' to a question that they have not understood?
- Do they keep repeating themselves?
- Do they suggest another family member deals with things for them?
- Do they say they have not understood previous correspondence or communication?

### Communicating with Vulnerable Customers

When we communicate with vulnerable customers we ensure that we:

- Speak clearly to customers.
- Set the expectations for the discussion.
- Demonstrate patience and ensure we do not rush them.

- Do not assume we know the customers' needs.
- Keep the discussion on the relevant topic.
- Offer the customer a different method of communication.
- Accept that customers can be forgetful.
- Double check the customer has heard what we have said.
- Check in case the customer does not have clear vision.
- Ask the customer if they need to speak to anyone before they make a decision.

If a customer is not in a position to make a decision or does not have the capacity to do so, we will try to find a family member, carer, or someone with authority and with appropriate ID who can act on their behalf. We will ensure that the authorised person knows exactly what is expected of them. If a vulnerable customer is identified we will thoroughly check to ensure the customer's needs have been met.