

Background

Research¹ into the scale of consumer vulnerability suggests that:

- 6.5m people have significant caring responsibilities
- 1 in 7 adults have a literacy skills expected of a child aged 11 or below
- Just under a half of adults have a numeracy attainment of age 11 or below
- 800,000 people in the UK have dementia of some degree
- 16% of working age adults have a disability
- In any given year 1 in 4 adults experiences at least one mental disorder
- Over 1.4m people in the UK are aged 85 or older
- Almost a half of adults do not have enough savings to cover an unexpected bill of £300

CIGA has issued around 6m Guarantees meaning that almost 1 in 4 households hold a CIGA Guarantee. It is therefore likely that a significant number of Guarantee holders, and customers with a complaint, would be classed as vulnerable. Critically, in 2010 84% of fuel poor consumers were also classed as being in a vulnerable household. Therefore, as fuel poverty has been a particular focus of successive initiatives aimed at improving the uptake of energy efficiency measures, it is likely that CIGA Guarantee holders include a disproportionately higher level of those considered to be vulnerable.

This Policy is therefore intended to ensure that in dealing with any complaints received that appropriate steps are taken to identify potentially vulnerable customers and ensure that relevant adaptations are made to the complaints process.

The Aim is to ensure that vulnerable customers are identified at an early stage and adaptations are made to that they feel comfortable going through the complaints process.

Definition

In seeking to define potentially vulnerable customers it is recognised that complaints in relation to CWI can be technically complex and will involve concepts and processes that are unfamiliar to many customers. Therefore, it is not possible to provide an exhaustive list, as a vulnerable customer is anyone who is at risk of not feeling comfortable with the process at that point in time, but the following highlights some of the factors that alone, or in combination, could make a customer vulnerable:

Personal characteristics

- Physical disability
- Communications needs
- Language
- Resource limitations
- Low basic skills
- Low financial capability
- Mental health problems e.g. depression / anxiety, bi-polar disorder
- Memory problems e.g. age, dementia
- Long term sickness, serious illness or frailty
- Elderly

¹ For example Research by the FCA, <http://www.fca.org.uk/your-fca/documents/occasional-papers/occasional-paper-8>

Personal circumstances

- Life events e.g. bereavement, illness
- Pregnancy or recent parents
- Recent bereavement
- Restricted mobility
- Severe financial difficulties and/or Income Support, Job Seekers Allowance, Pension Credit or Employment Support Allowance
- History of alcohol or drug misuse
- Victims of Burglary
- Victims of Fraud
- Victims of domestic violence

Identification

In order to address the needs of vulnerable customers correctly it is important to be able to identify those at risk and ensure that staff are trained to look for risk factors or combinations of risk factors which may increase the customer's vulnerability. However, whilst this section focusses on identification of vulnerable customers, it is important to recognise that anyone could be vulnerable due to their characteristics and current situation.

The intention is to ensure that the customer has the capacity, at that moment in time, to make an informed decision about the implications of the advice they are being provided with. 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.

Whilst in many cases a customer will self declare a condition that makes them vulnerable, possible indications that a vulnerable customer is involved could include signs such as:

- They ask you to speak up or speak more slowly
 - can they hear the complete conversation or are they missing important bits?
 - do they understand what you are saying?
- They appear confused
- You can hear a baby crying in the background
- do they know what is being discussed?
- do they ask unrelated questions?
- do they keep wandering off the point in the discussion and talking about irrelevancies or things that don't make sense?
- do they keep repeating themselves?
- do they say 'Yes' in answer to a question when it is clear they haven't listened or understood?
- They take a long time to get to the phone and sound flustered or out of breath, indicating they may have a lack of mobility due to age or illness
- They take a long time to answer questions. They say "my son/daughter/wife/husband deals with these things for me"
- Where there is a language barrier they are vulnerable as they may not fully understand what is being said to them
- They say that they don't understand figures put to them, a previous phone conversation or recent correspondence.

In the event that it is suspected that a Vulnerable customer may be involved, then gentle prompts such as enquiring who occupies the property, whether they are on the PSR (Priority Services Register operated by utility companies) or asking whether there are any adaptations that are required to help them with their complaint may be appropriate.



Dealing with Vulnerable Customers

In dealing with vulnerable customers it is important that the process is made accessible through adaptation, for example large print letters, and that Staff dealing with vulnerable customers adapt their approach, which may, for example include the following:

- Speak clearly and enunciate
- Set expectations for the call – outline all the information that will be required – address and details of the concerns etc – and how long the call is likely to last.
- Be patient and spend time listening whilst the customer gets to the core problem.
- Empathise
- Don't rush them – if they need to put the phone down to find details it could take them some time.
- Guide the call to keep it 'on topic'.
- Don't assume that you know what the customer needs – it's easy to rush through if the consumer is slow or not able to explain what they need.
- Clarify understanding at every point posing the question "is there anything you'd like me to explain?"
- Ask the customer to explain to you what they understand is happening.
- Offer alternatives to dealing with things by phone, ie by post or email.
- Don't assume that the person you are talking to is sighted.
- Don't assume that the person you are talking to can hear everything you are saying – they may have a hearing impairment.
- Remember that a vulnerable customer can sometimes be forgetful or overly trusting.
- Give the customer time to explain fully – don't interrupt or show impatience.
- Listen for what isn't being said, not just what is – e.g. absence of understanding, commitment, timing type questions on the part of the person receiving the call should ring alarm bells.
- Ask if there is a better time to call – e.g. some people will function better in afternoons than mornings.
- Ask whether there is anyone else they need to talk to before making the decision
- Ask if they would like someone else to talk to you on their behalf.
- Ask if they would like a follow up call so they can take advice from family or a friend.

Vulnerability Policy

All members of staff who have any customer contact have a duty to help ensure that vulnerable customers and identified and adaptations made, and all staff must read this policy regularly and ensure they understand it fully.

- Once a potentially vulnerable customer has been identified, or the staff member reasonably believes that they are dealing with a vulnerable customer, they should immediately refer the matter to the Head of Customer Service who will review the circumstances and decide if and how the service provided should be adapted.
- The Head of Customer Service must satisfy themselves that the customer has particular needs, to ensure future communications are tailored to those needs and that a sole point of contact is provided to ensure a consistent service.
- The Head of Customer service is responsible for recording any information regarding the vulnerable customers. However, and information must be recorded with the full knowledge and consent of the customer, and be kept accurate and up to date. Particular care must be taken if recording any medically related information, as it is classed as sensitive and personal. It must be checked for accuracy, be relevant but not excessive.
- As a customer's circumstances can change all Staff should be aware of any new information that could affect vulnerability, and escalate the case to the Head of Customer Service.
- If a customer does not want to be called again as a direct result of their incapacity or health issues, then the matter should be referred to the Head of Customer Service who will respond with suggestions of alternative means of communication.

- Where a problem occurs as a result of the customer's incapacity, and perhaps lack of understanding, the Head of Customer Service may review calls with staff to identify where the misunderstanding took place and identify what procedural changes or additional training is required to prevent it happening again.
- Where a vulnerable customer does not have the capacity to make the decisions that are required the Head of Customer Service will try to identify a carer or someone who is authorised to act on behalf of that customer or suggest that the customer contacts a source of assistance, such as local Citizens Advice Offices, The Citizens Advice Consumer helpline (03454 04 05 06), Age UK (0800 169 2081), or Trading Standards.
- In the unfortunate event that a customer suggests that they may be thinking of committing or have committed any form of self harm then the call should ideally be transferred to a relevant agency such as the Samaritans (Phone 116 123) or alternatively transferred to the Head of Customer Services or the Chief Executive who will contact the police.

All members of staff, regardless of grade or level who have any customer contact must read this policy regularly and ensure they understand it fully.

