

Vulnerable Persons Policy

What is a Vulnerable Customer?

Any customer who is susceptible to loss or harm and whose situation or capabilities require us to take additional precautions (when we are selling or promoting our products and services) to ensure that the vulnerable customer is not disadvantaged in any way.

These vulnerabilities may include (but not limited to):

- Physical or mental disability
- Terminal illness
- Age (elderly or young inexperienced customers)
- Dementia
- Confusion; not retaining information
- English as a second language
- Mental capacity limitations
- Financial capacity limitations/Debt
- Job Loss/low income
- Low literacy skills
- Induced intoxication by the use of alcohol or illegal/legal drugs

How do we identify vulnerable customers?

Face to Face

Some signs are obvious if you can see your customer. For example a customer could be blind or deaf, elderly young etc. They may show signs of confusion or inability to retain information by asking the same question repeatedly. Their mannerisms or gestures and facial expressions may tell you they are vulnerable.

On the telephone

They may ask repeated questions or show an inability to distinguish or understand what is being discussed. They may demonstrate difficulty in hearing what is being said or respond with inconsistent answers. Shortness of breath may indicate a physical disability.

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What to do if you identify a vulnerable customer.

Should this situation arise and it becomes obvious that the information we provide to the customer is not being understood then we should seek the involvement of a trusted friend or relative. We will re-appoint and arrange for a trusted friend or relative to be present during the next visit to the customer's home or before the next agreed telephone call.

It is very important that we follow this procedure before we ask for any contractual commitment from the vulnerable customer. It is much better to provide the customer with more time than it is to 'push' for a decision that may subsequently become a management issue.

If in doubt always seek guidance from your manager before acting.

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