

A vulnerable customer is defined as someone who has personal circumstances that place them at a higher risk of detriment, more so if a company does not act with the appropriate level of care. The majority of customer protection legislation assumes an average level of expectation, understanding and behaviour from the customer, however vulnerable customers may struggle to represent their own interests and as a result suffer more harm than a typical client would.

Windsor Telecom make it an utmost priority to ensure all our staff are capable of identifying vulnerable customers, and that they are able to handle the situation with the required levels of care, attention and respect.

In any market sector, there will be instances where a customer may find it difficult to make an informed decision about their available options; as the population becomes more diverse, language barriers become a common problem whereby a customer may struggle to understand terminology, especially technical language used in the telecoms industry. Other typically encountered scenarios include customers who are illiterate, those suffering from anxiety, and others with disabilities that affect sight, hearing or speech.

In the telecoms industry customers are often contacted via phone in relation to their products to discuss any issues, amendments and offers. The ongoing contact with a customer is paramount to providing good customer service and ensuring the customer is aware of any details relevant to their policy; resultantly it is very important that Windsor Telecom ensure our vulnerable clients are able to fully understand our communications to maintain fairness and equality of service to all of our clients.

Identifying Vulnerable Customers

For our staff to correctly address the needs of a vulnerable customer, it is important to be able to identify them. Risk factors that can help to identify a vulnerable customer include illness, disability, illiteracy, bereavement and other impairments. At Windsor Telecom, our staff have sufficient skills that allow them to adapt their approach to ensure the customer they are dealing with is able to make an informed decision about the implications of all aspects of our communication.

Our staff are made aware of the Mental Health Act of 2005, namely the following principles:

- a person is unable to make a decision for himself if he is unable to understand the information relevant to the decision
- a person is unable to make a decision for himself if he is unable to retain that information
- a person is unable to make a decision for himself if he is unable to use or weigh that information as part of the process of making the decision
- a person is unable to make a decision for himself if he is unable to communicate his decision (whether by talking, using sign language or any other means)

In order to help our staff to identify vulnerable consumers, and to ensure adherence to the Mental Health Act of 2005, Windsor Telecom raise awareness of key indicators that often highlight a risk factor such as:

- Can the client hear everything you are saying OK and do they understand what you are saying? Do they ask you to slow down or to speak louder? Are you sure they have heard and understood all the relevant details? Do they ask you to clarify any details or advise they do not understand terminology being used?
- Does the client stay on topic and hold a sensible conversation, or do they appear distracted or confused? Do the clients responses remain relevant and are their questions typical for the discussion being had?
- Does the client answer questions before you have finished asking them, or appear to reply to a question they do not understand? Alternatively, does the client take an unusually long amount of time to answer a question that suggests they are struggling to process the information provided to them?
- Does the client indicate they may have a disability or impairment based on their voice, pronunciation, breathing, hearing or ability to understand the conversation? Are they coherent and fluent in the language being used?

Dealing with Vulnerable Customers

When dealing with vulnerable customers, Windsor Telecom train staff to tailor the communication appropriately to ensure the needs of the client are met, and that they are not exposed to detriment; this is usually achieved by ensuring staff remain aware of the following guidelines:

- Remain patient and empathetic; do not rush the client, interrupt or appear impatient. Allow the consumer to arrive at their own decisions and process the information sufficiently.
- Ensure the client is able to hear and understand what you are saying; ask the client to explain their understanding of what you are telling them or include questions as frequently as possible to ensure they are paying attention and are aware of what is being discussed.
- Allow the client to explain thoroughly; do not assume you already know what their requirements or needs are, and do not finish off their sentences which often implies you are rushing them to progress the conversation. Listen carefully to the client and remain conscious of any absence of understanding, hints at unawareness, or forgetfulness of topics already discussed.
- Clarify that the customer is comfortable with the standard and method of communication, and offer to provide details in an alternate format such as via post or email for clarity. Before acting on a vulnerable consumer's advice, ask if there is anybody else they need to speak to about their decision.

Once Windsor Telecom identify a vulnerable customer, or reasonably believe that a customer they are dealing with should be considered vulnerable, relevant notes are added to their record in line with the 1998 Data Protection Act to ensure awareness extends to all staff within the company who deal with the client. It is important that we maintain a consistent level of service, and that a vulnerable customer receives adequate care irrespective of which staff they liaise with. In the event that a vulnerable customer raises a complaint or has a grievance with how they have been treated or spoken to, Windsor Telecom will conduct an investigation into employee conduct by assessing the

standard of communication used in emails, letters and phone calls, so far as is possible. This investigation will allow management to identify any required additional training or a necessary procedural change to prevent a reoccurrence. In the event that a vulnerable customer is unable to make a decision for themselves regarding their services, as per the Mental Health Act of 2005, our staff will attempt to identify a carer or kin who is authorised to act on their behalf with respect to financial affairs. Quite often a parent or spouse will represent the interests of the vulnerable customer; it is Windsor Telecom's duty to the client to ensure the decisions made are appropriate for the customer.

In the event that a client becomes notably aggressive or distressed due to their incapacities, our staff should make management aware to ensure that the customer is treated empathetically and fairly. If a client threatens to self-harm, or advises they have already committed any self-harm, the call should be immediately escalated to management who will inform the Police. Windsor Telecom will assist the Police with any further enquiries and support the staff member who may be distressed as a result of the call. Windsor Telecom consider all of our clients as equally important, and those who are suffering with a vulnerability must be treated with the care and respect they deserve. All staff members who deal directly with clients, regardless of department or position, must familiarise themselves with this policy and ensure they understand it completely