



## Telecoms and Media Advisory

### 10 principles of addressing customer vulnerability for call centre employees

#### 10 ways to help vulnerable customers achieve good outcomes

As we emerge from the pandemic and start experiencing higher fuel bills, and increased national insurance contributions, its impact has been as severe on our financial wellbeing as on our physical and mental health. The lockdown has meant that many people have seen their incomes reduced and some have lost their jobs altogether. Since the lockdown, many have experienced a significant increase in the cost of living with the national insurance tax increases, the rise in energy bills and food and car fuel costs, and some people have had their incomes reduced or lost their jobs altogether.

Many consumers who wouldn't normally identify themselves as vulnerable may now unexpectedly find themselves in a position of vulnerability, perhaps because they've been made redundant or been furloughed and lost income as a result or experienced significant increases in the cost of living.

Not all customers are the same – there are many ways in which the Coronavirus pandemic could make someone vulnerable – and some have very specific needs that must be met if we're to achieve good outcomes for them. These 'customers in vulnerable circumstances' need additional support and understanding in their day-to-day dealings with us, so that they can make informed decisions that are right for them advised to help customers by upholding the principles outlined by [OFCOM 'Vulnerable customers must be treated fairly'](#).

# What is a 'customer in vulnerable circumstances'?

The Financial Conduct Authority has defined a vulnerable customer as “someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when a firm is not acting with appropriate levels of care”.

While we would always seek to treat each customer with an appropriate level of care, we have to recognise that some customers' personal circumstances can leave them at particular risk of detriment. Their vulnerability can be due to a range of factors, such as their age, a physical or mental disability, a life event such as divorce or bereavement, having been the victim of crime, or having limited language, literacy or numeracy skills, and it can be permanent or temporary.

Whatever the cause of their vulnerability, the customer is likely to have difficulty understanding information about the plan they have with us and the service we provide, accessing information to help themselves, and making decisions about their plan. This puts them at risk of financial detriment.



## How can you help vulnerable customers?



**Recognise when a customer is vulnerable**



**Listen, show tolerance and empathy, and speak to and deal with them in a way that best suits their needs**



**Record the nature of their vulnerability, with their permission, and the things you can do to make it easier for them when they contact you in the future**



**Adapt and be flexible in your processes and requirements, where possible**



**Be alert to requests and actions that could expose them to detriment through fraud or scams**

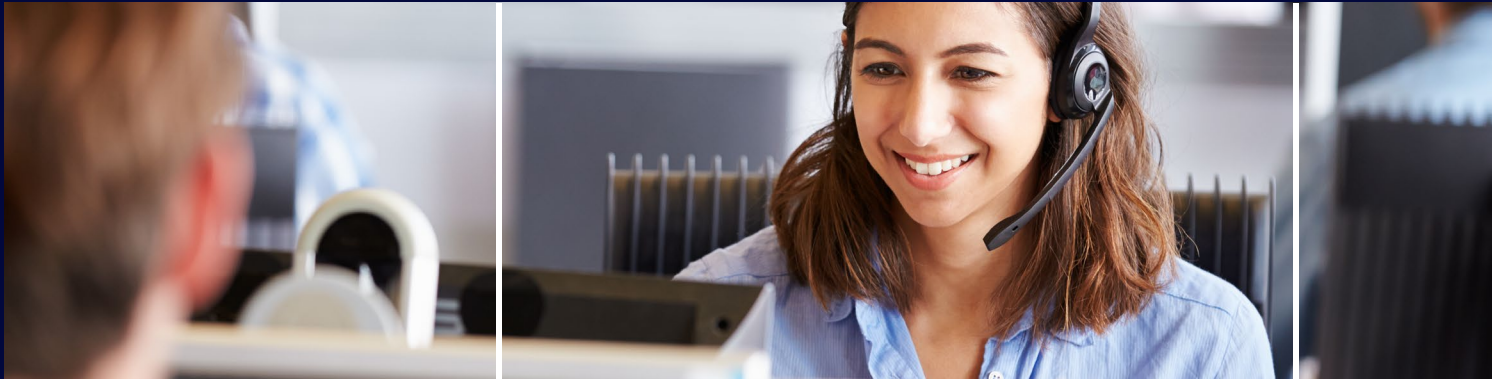


**Signpost third parties that can provide expert help, if appropriate.**

# 1

## What practical steps can Communication Service Providers take?

Encourage your call centre staff to use these best-practice techniques to provide high-quality support for vulnerable customers



Identifying a customer in vulnerable circumstances:



**People can be vulnerable for many different reasons:**

- Personal characteristics – mental health, mental capacity, physical disability, learning ability, language
- Personal circumstances – bereavement, job loss, illness, family breakdown, addiction
- Creditor / enforcement action – bankruptcy, repossession, eviction.



**They can show various indicators of vulnerability, but these can include:**

- a sudden change in behaviour
- appearing helpless, depressed, tearful, fearful or panicky
- anger and aggression
- becoming quiet or withdrawn
- inconsistent or erratic communication
- an inability to accept their situation.



**Critically, it is worth observing whether they can:**

- understand
- communicate
- remember
- weigh up.

If a customer shows any of these vulnerability indicators, your call centre staff should assess them further by investigating the following in more depth:

### IDEA drill

- I - IMPACT** – what does the customer's condition stop them from doing or make it hard for them to do?
- D - DURATION** – how long has the customer been living with the condition?
- E - EPISODES** – is it temporary or permanent?
- A - ASSISTANCE** – does the customer get assistance? What can we do to achieve a better outcome?



# 1

## What do you do when a vulnerable customer has been identified?

A customer's disclosure of their vulnerable situation represents a moment of trust and opportunity. **Following the TEXAS drill enables your call centre staff to make the most of that opportunity:**

### TEXAS

- T** – Thank them and explain that the information will enable you to deal with them and their plans better
- E** – Explain how you will use this information
- X** – Get their explicit consent to record the information
- A** – Ask them questions about their circumstances to assess how you can help
- S** – Tell them where they can get external help.

Many vulnerabilities require specific support and expertise that you may not be able to provide. Your call centre staff should record the vulnerable circumstances after receiving the customer's agreement. They can use the list of specialist organisations and charities in Appendix 3 to refer customers for further help. We'll continue to update this list, to provide you with the most up-to-date information available.





## What do you do when customers have limited mental capacity?

A customer's vulnerable circumstance may have limited their mental capacity. In this case, it's worth trying to comply with the five statutory principles of the Mental Capacity Act 2005:



A presumption of capacity, unless it's established that capacity is lacking



Customers should be supported in making their own decisions using all practical steps



An unwise decision alone is not evidence of lack of capacity



Any action taken when capacity is lacking must be in the customer's best interest



Any action taken when capacity is lacking must be the least restrictive option.

You should use the following technique in these circumstances:

### BRUCE

- B** – Behaviour, look for clues of a limitation in the customer's behaviour and speech
- R** – Remembering, are they struggling to remember what you've said? Ask what might help, for example can they write it down, or is someone else available to support them?
- U** – Understanding, ask them to summarise their understanding. Fill in any gaps by repeating your comments using different examples
- C** – Communication, find out how would they prefer to communicate and try to accommodate that. Allow enough time for them to answer your questions and pause regularly
- E** – Evaluation, discuss each option simply with any pros and cons.





# 3

## What do you do when information comes from a carer?

You must have robust processes in place to protect customers and their data but, increasingly, carers, with the best interests of your customer at heart, will seek to engage with you on their behalf.

Your call centre staff should follow this predefined CARERS drill:

### CARERS

**C** – Check first for evidence of authority. If there's nothing in place...

**A** – Avoid discussing any plan or personal details with the carer, explaining why

**R** – Reassure them that their concerns can still be recorded as unverified observations

**E** – Explain that their observations will need to be shared with the customer and your colleagues.  
Obtain consent from the policyholder to share their data with their carer or your colleagues if they have the mental capacity to give it

**R** – Record their comments

**S** – Summarise the next steps.



## 4

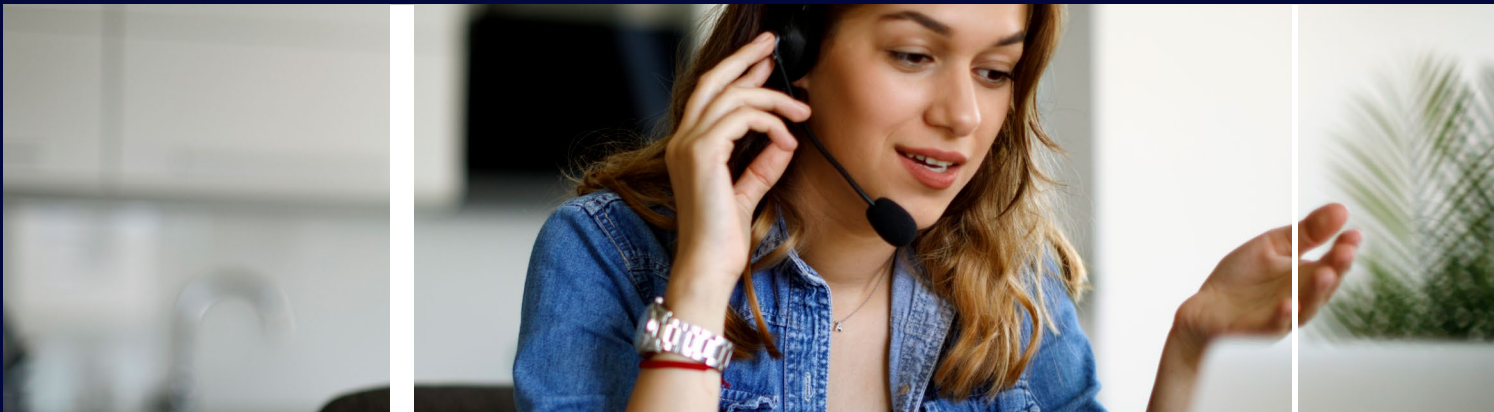
### What to do when customers are suicidal?

A customer disclosing suicidal thoughts or behaviour is a daunting prospect for any call centre team member. But the fact that they've made such a disclosure offers a critical moment of opportunity to help someone who, rather than actually wanting to take their own life, may be desperate to change it.

In this situation, you should follow this protocol:

#### BLAKE

- B** – Breathe to focus, gather your thoughts and acknowledge what the customer has said
- L** – Listen to fully understand what the customer is saying and assess the imminent risk of harm
- A** – Ask to get more information that will help you to assess the risk further
- K** – Keeping the customer safe from harm is your primary goal
- E** – End with summarising what you've agreed with the customer once their safety has been addressed.



You should talk to a customer about referring them to a listening organisation such as the Samaritans but, in situations where you feel that there is a real risk to their safety, contact the emergency services urgently and let the experts take charge. Such calls can be traumatic for call centre staff, so have a plan in place for supporting them.

### In conclusion

The strategy we're recommending will continue to evolve, but always remember to:

- Use the customer's name
- Remain respectful, including towards differences in ideas, personality and ability
- Use appropriate language
- Recognise the choices that vulnerable customers make or have made, even if they appear risky or unwise
- Reassure customers about privacy and confidentiality
- Ask who they would like to include in decisions affecting their life
- Offer assistance, but try to maximise the customer's independence
- Use positive language when referring to disability, age and mental health
- Ask customers about their specific needs and any solutions they would like you to consider



## Appendix 1

OFCOM provided a consultation on how to [treat customers fairly](#):

### **Principle 1: Taking an inclusive approach to who is potentially vulnerable.**

Three and Money Advice Trust felt that there should be a more consistent definition of vulnerability across regulators. Citizens Advice Scotland said that people from rural areas in Scotland who experience poor connectivity should be considered vulnerable, especially if they are reliant on such for health care services. Citizens Advice considered that more consideration should be given to low income as a driver of vulnerability.

### **Principle 2: Publishing policies on treating vulnerable customers fairly.**

Some examples of circumstances that could indicate that a consumer is vulnerable. These include age, a physical or learning disability, a physical or mental illness, low literacy, communications difficulties or changes in circumstances such as bereavement. This is not an exhaustive list, and some people might face a combination of circumstances at any point. Vulnerability may also change over time. when designing policies and procedures on treating vulnerable consumers fairly, we expect providers to take an inclusive approach to who may be considered vulnerable. This means having an approach that includes and takes account of the different types of vulnerabilities that their customer base might be facing.

This will ensure that their policies and procedures cover the wide range of people who might need their help, support and services. a large proportion of people in the UK could potentially become vulnerable due to changes in their personal circumstances. So, providers must have a robust understanding of the different issues that could affect their customers and use this to inform their policies and practices.

### **Principle 3: Publishing policies on treating vulnerable consumers fairly.**

Providers need to publish their policies and procedures. When publishing them, we expect the information to be accurate and up-to-date, easy to understand, clearly signposted and easy to find. For people who do not use the internet, we expect providers to have information available via different communication channels on request. These could include paper copies available by post or in store.





# Appendix 1

## **Principle 4: Treating vulnerable consumers fairly** **It's important in the first instance to identify vulnerable consumers.**

Evidence suggests there is much more progress providers can make in this area. While some providers have some records of vulnerable consumers in certain groups, the overall number of customers identified by providers as potentially vulnerable is significantly smaller than we might expect. In addition, people's individual circumstances can change at any point. We may have not realised that a person's life or circumstances might have changed.

A new customer might not be vulnerable at the time of signing up to a new provider, but changes in their personal circumstances might lead to them becoming vulnerable in future. Providers are asked to raise awareness of the help, support and services on offer to new, existing and re-contracting customers, and do all they can to encourage consumers to tell them about any specific accessibility or customer services needs they have, to avoid creating any barriers to them receiving the help they need.

### **Measures to help with this include:**

Ask all customers at the earliest opportunity whether they have any specific accessibility or customer service needs that the provider could help with.

- Give all customers a statement about the help they offer customers who are vulnerable or have specific accessibility or customer service needs, and explain how they can sign up for it. This statement should also be published so its contents are easy to access.
- Have a range of methods for customers to inform or update them about any vulnerability they may be experiencing, or any specific accessibility or customer service needs they have. These could include online forms, a phone number or web chat function.
- Tell customers about the help, support and services available via all communication channels, where appropriate, so they can decide whether they would be useful to them.

## **Principle 5: How providers can help vulnerable consumers**

The below a range of suggested measures that we encourage providers to consider including in their policies and procedures.

### **1. Offer a wide range of communication channels**

These should include telephone, post, email, webchat, video call and text. Providers should also ensure customers can carry out important account activities such as sales, billing or complaints using these channels. As noted above, providers are also required to provide text relay services and bills in large print or Braille.

### **2. Make customer interactions a positive experience'**

Service providers are encouraged to focus on making customer interactions positive for their customers, especially vulnerable people. Frontline staff should be trained to communicate with vulnerable consumers with empathy and support, and listen carefully to what they say, to help them feel more comfortable in speaking to their provider or sharing their customer service needs.

Small changes in the approach to vulnerable customers will have a meaningful impact on a customer's experience, for example, allowing more time on a telephone call to ensure a high-quality conversation, rather than focusing on call time targets. Providers should also allow customer service advisors some degree of flexibility to go 'off-script' when speaking to vulnerable consumers, as they might need more detailed information or a specific approach that suits their needs.

# Appendix 1

Providers are also encouraged to do what they can to avoid vulnerable consumers having to explain their personal circumstances each time they contact them, which could be frustrating and/or distressing.

- a. Customer service advisors should make clear and detailed notes on their internal systems.
- b. Any recorded information on a customer's personal circumstances should be made available to customer service advisors when they speak to that consumer.
- c. Vulnerable customers should not need to repeat themselves when they are put through to another person or department. This can be achieved by customer service advisors discreetly passing on relevant information.
- d. A direct contact should be available for consumers who would benefit from this.

Some providers are taking steps to also improve face-to-face interactions with customers. Examples include checking in advance if someone might take longer to answer the door, deploying engineers for relatively minor issues like installing equipment, where this would help the customer, and having dedicated sessions with British Sign Language interpreters.

## 3. Provide clear accessible written communications

Providers are encouraged to ensure their key written communications, including web chat, bills, terms and conditions, policy documents and contracts, are clear and use plain English.

Providers should also tailor content to customers' specific needs and be clear if there is an action for the customer to take, for example, if they are expected to get in touch or make a payment. Where relevant, written communications should also include information on the help, support and services that are available to vulnerable groups.

Providers should review their communications regularly, to ensure they are fit for purpose and take account of any feedback or good practices shared by charities and consumer interest bodies. They could also test their communications with customers, where appropriate.

## 4. Promote the extra help, support and services that are available

Providers are encouraged to promote the full range of extra help, support and services they offer to customers. We also remind providers that they are obliged to promote the services they offer to meet the needs of consumers with disabilities.

## 5. Implement specialist customer service teams or identify staff members who can help.

Providers are encouraged to have specialist staff in place who have had specialist training on helping vulnerable consumers.<sup>14</sup> Where a vulnerable consumer's needs will be better met by a specialist, they should be referred as soon as possible.

## 6. Signpost other organisations that support vulnerable consumers

In some cases, it may be appropriate to refer customers to a third-party organisation such as Citizens Advice, debt charities, mental health charities, the Samaritans<sup>15</sup>. This is because they may be better equipped to provide specialist help and support.

## 7. Help third parties, such as relatives or carers, who are supporting vulnerable consumers

Vulnerable consumers are sometimes helped by people such as relatives or carers. We encourage providers to be sensible when communicating with these people when required so they can deal with queries or issues on behalf of consumers without unnecessary barriers.

Providers must also make sure that vulnerable customers are appropriately protected from unauthorised activity or scams. A person acting on behalf of a customer should be authorised to do so, and should pass appropriate security measures to access a customer's account.

## Appendix 1

### 8. Act fairly when a consumer is facing problem debt

Debt can be stressful and can have a significant impact on a person's mental health. Research by the Money and Mental Health Institute shows that, each year, 13% of people in problem debt think about suicide and three per cent of people in problem debt attempt to take their own life.

Use a range of communication channels when contacting a customer about their debt before taking any follow-up action, including enforcement or debt recovery.

- Allow a customer some time to get help, support and debt advice (without the threat of enforcement action or disconnection during the same period).
- Discuss and agree a reasonable payment (including considering any advice or proposals from a debt adviser) and being clear on any additional costs involved and how services will be affected.
- Refer customers to debt organisations or charities who can provide free debt advice and support (directly where possible).
- Proactively offer tariff advice, whether that is switching to a cheaper tariff or social tariff.





## Appendix 2

Have you taken these actions to develop, support and implement your strategy?

**Have you:**

- ✓ Declared your commitment and desire to help vulnerable customers to achieve good outcomes
- ✓ Held workshops and considered the types and nature of the vulnerabilities that your customers face and how you can best support them
- ✓ Provided training for staff to identify a vulnerable customer
- ✓ Provided training for staff to experience types of vulnerability
- ✓ Provided training for staff to help and support customers once a vulnerability had been identified
- ✓ Established a means of recording the nature of the vulnerability and how you could best support the customer so that they get a better experience in the future
- ✓ Identified vulnerable customer champions and experts who can support, guide and, if necessary, take over contact with vulnerable customers
- ✓ Established channels for approving or supporting the varying or waiving of normal process requirements
- ✓ Maintained a log of actions in support of vulnerable customers, to inform you whether there are other actions that you should take, to be consistent across cases, and to remind staff about how you support vulnerable customers
- ✓ Regularly provided refresher training on vulnerable customers and maintained your focus on vulnerable customers' needs with updates from vulnerable customer champions
- ✓ Encouraged staff members to share customer stories
- ✓ Monitored this initiative's effectiveness
- ✓ Been committed to the OFCOM's strategy recommendations, ongoing training and sharing good practice.



## Customers with vulnerable circumstances

### Signpost opportunities

| Condition            | Agency                                     | Contact number                                       |
|----------------------|--------------------------------------------|------------------------------------------------------|
| Alzheimer's          | Alzheimer's Society                        | 0330 333 0804                                        |
| Anxiety / depression | MIND                                       | 0300 123 3393                                        |
| Arthritis            | Arthritis Care                             | 0808 800 4050                                        |
| Bereaved             | Cruse                                      | 0808 808 1677                                        |
| Cancer               | Macmillan Cancer Support                   | 0808 808 0000                                        |
| Debt                 | National Debt line (MAT)                   | 0808 808 4000                                        |
| Dementia             | Dementia UK<br>National Dementia Helpline  | 0800 888 6678<br>0300 222 1122                       |
| General              | Citizens Advice<br>Zurich Support Services | 03444 111 444<br>0800 326 5061                       |
| Hearing              | Action on Hearing Loss                     | 0808 808 0123                                        |
| Heart                | British Heart Foundation                   | 0300 330 3311                                        |
| Homelessness         | Shelter                                    | 0808 800 4444 (non-urgent)<br>0808 164 4660 (urgent) |
| Sight                | RNIB                                       | 0303 123 9999                                        |
| Stroke               | Stroke Association                         | 0303 303 3100                                        |
| Suicidal             | Emergency services<br>Samaritans           | 999<br>116 123                                       |