

OUR VULNERABLE PEOPLE'S POLICY

For the purposes of this policy, vulnerable people are customers and prospective customers whose ability or circumstances require us to take extra precautions in the way that we provide our services. We will take all reasonable measures to ensure that the risks of harm to welfare are minimised and that all people are treated fairly.

Recognising a vulnerable consumer

When engaging with customers it is often difficult to recognise a vulnerable consumer because unless it is a face-to-face conversation it will not be possible to see many of the characteristics, such as body language and facial expressions, which may identify whether the customer requires additional information and guidance to enable them to make an informed decision. For this reason, it is critically important to listen carefully to all customers and to identify those who may be classed as vulnerable. Characteristics that may indicate a vulnerable customer include:

- An inability to hear or understand what is being said.
- Repeated questions of a similar nature.
- Comments or answers which are inconsistent with the discussion or which indicate they have not understood the information which has been provided.
- Verbal confirmation that they don't understand or that they require the assistance of somebody else to help them decide.

What to do if we are engaging with a vulnerable consumer

Just because somebody is vulnerable does not automatically mean that they are unsuitable for the products and services that we supply. As soon as we think we may be engaging with a vulnerable customer we should immediately make a record of this, that confirms with data protection rules, and ensure we adhere to this policy.

When speaking to a vulnerable customer we will:

- Remain patient and empathetic; do not rush the customer, interrupt or appear impatient.
- Provide additional opportunities for the customer to ask questions about the information we have provided.
- Continuously seek confirmation that they have understood the information provided.
- Refer them to someone with more specialist training if the customer is happy.
- Ask if there is anybody with them who can assist them, and offer them the opportunity to have a family member or friend present during the conversation.
- Offer them the opportunity to complete the transaction after a period of further consideration.

If we think the customer does not understand the service which is being offered to them we will not proceed with the transaction and inform them that we will write to them with further information about the product or services they are seeking.