



GHG Customer Vulnerability Policy

Name - Author:	Caroline Anderson
Position/Role:	Senior Administrator
Policy Version Number	1/2020/1/15
Due for Review by:	1st December 2021
Approved By: Managing Director	Austin Snelgrove

Contents

1	Purpose	3
2	The FCA Definition of Vulnerability	3
3	GHG 's Definition of Vulnerability	3
4	Customer Vulnerability	3
4.1	<i>Examples of Risk Factors for vulnerability. (FCA 2015)</i>	3
4.2	<i>What additional support can we provide to vulnerable people?</i>	4
4.3	<i>Methods of communication.</i>	4
5	Customer Care Team.....	4

1 Purpose

This policy details how GHG Solutions will identify and manage vulnerable persons and ensure a consistency of approach within the company.

2 The FCA Definition of Vulnerability

“A vulnerable consumer is someone who, due to their personal circumstances, is especially susceptible to harm, particularly when a firm is not acting with appropriate levels of care”.

3 GHG ‘s Definition of Vulnerability

“Vulnerability is when a person’s circumstances and characteristics mean that they are significantly less able than a typical customer to protect or represent their interest and they are, as a result significantly more likely than a typical customer to suffer detriment. It is also likely that any detriment will be more substantial than average.”

4 Customer Vulnerability

Some customers will be vulnerable because of their personal circumstances. Actual vulnerability can be permanent but is often transient because circumstances constantly change. This can cause customers who had not previously been vulnerable to become so at some stage of their life.

4.1 Examples of Risk Factors for vulnerability. (FCA 2015)

- Low literacy, numeracy and financial capability skills.
- Physical disability.
- Severe or long-term illness.
- Mental health problems.
- Low income and / or debt.
- Caring responsibilities (including operating a Power of Attorney)
- Being “older old” for example over 80, although this is not absolute (may be associated with cognitive or dexterity impairment, sensory impairments such as hearing or sight, onset of ill health, not being comfortable with new technology).
- Being young (associated with less experience).
- Change in circumstances (e.g. job loss, bereavement, divorce).
- Lack of English language skills.
- Nonstandard requirements or credit history (e.g. Armed Forces personnel returning from abroad, ex-offenders, care home leavers, recent immigrants)
- Restricted mobility
- Severe financial difficulties and/ or Income support, Job seekers allowance or pension credit
- History of Alcohol or drug abuse
- Victims of Burglary, Fraud or Abuse

4.2 What additional support can we provide to vulnerable people?

- Listen for key indicators “trigger words”. Illness, bereavement, doctors, disability, moving, divorce etc.
- I don’t understand what you are saying, there are clear signs of distress and confusion.
- Signs of agitation and inpatients
- Be open, sympathetic and caring from the first contact.
- Ensure your engagement with customers is “flexible” avoid responses such as we cannot do that, or “the computer says no”.
- What is the customer actually seeking? Are they embarrassed by something? Try to be understanding.
- If someone is not responding either verbally or to written communication is it because they do not understand? Try a different approach.
- Offer different methods of communication. What will suit the customer best? Telephone contact? Written communication? Emails? Referral to a website or perhaps a personal visit.
- Would they like us to speak to someone on their behalf? A carer, a parent, a child?

4.3 Methods of communication.

- How would you like them to be treated?
- How would they like to be communicate with Verbally, email, letter?
- Ask if they would like someone else to talk on their behalf if they are having difficulties.
- If communication is verbal, then speak clearly and listen intently.
- Be patient whilst the customer gets to the core of the problem.
- Empathise where possible.
- Clarify understanding at every point posing the question “is there anything else you would like me to explain.
- Seek clarification that they understood what is being said or happening.
- If the communication is written, then use clear plain English with no jargon.

5 Customer Care Team

GHG Solutions Customer Care Team will be proactive in engaging with identified vulnerable customers support maintains a regular one to one contact. Providing ongoing support, ensuring that all concerns and customer welfare are promptly addressed.