

POLICY STATEMENT

We recognise that certain groups of customers may be vulnerable.

Whilst not all customers in these groups may be vulnerable, we will consider customer's individual circumstances where a potential vulnerability is identified.

These groups may include, but are not restricted to:

- Long term sickness, serious illness or frailty
- Elderly
- Physical disability
- People with learning difficulties, or mental health problems
- Recent bereavement
- Severe financial difficulties and/or Income Support, Job Seekers Allowance, Pension Credit or Employment Support Allowance
- Customers with communication difficulties
- Customers with a history of alcohol or drug misuse
- Victims of domestic violence

Where we are aware that a person may be vulnerable we will adapt our collection procedure accordingly to minimise any hardship or distress.

We recognise that certain recovery options are not appropriate where a customer is identified as vulnerable, and we will act to personalise the action we take to reflect this.

All staff should be particularly aware of any customer who:

- clearly does not understand the reasons for the actions we are taking
- becomes upset when struggling to understand the actions we are taking
- is clearly unable to understand/retain the information and explanations you provide
- appears confused about the personal or financial information you are seeking
- appears unable to recall or communicate basic personal information
- provides conflicting answers to questions
- asks the same question repeatedly
- appears to have no awareness of their own financial circumstances

Where a potentially vulnerable customer is identified, you **MUST** obtain their permission to share this information with our client.

Follow Up Actions

When dealing with vulnerable customers we will adopt key principles that our staff will adhere to:

- We will maintain an up to date record of any customer identified as being vulnerable.
VC Flag to be raised in case management system
- We may direct those customers to other sources of debt advice, such as Citizens Advice Bureau, Step Change debt charity etc.
Free advice leaflet to be provided to customer
- We will monitor our complaints procedure to identify any trends.
Management information. Separate complaint logs to be produced monthly to monitor trends.
- All staff must advise management of any customers they identify as possibly being vulnerable.
- We will monitor our staff, and discuss this subject at regular staff meetings as per the companies' Management Review Schedule.
QMS Management review meeting minutes
- We will work with advice agencies, where applicable, to agree repayment schedules that are affordable, and recognise a customer's priority debts.
- We will pass on debt advice contact details.
- We may ask customers experiencing financial hardship to complete personal budget sheets, to enable us to agree fully informed repayment schedules that are affordable to the customer, and in the best interest of our clients
- If we do not accept a repayment arrangement, we will fully explain why.

Acknowledgement:

I have read and understood the content of this policy.

I am aware of where to find it on the Integrated Management System to ensure I am updated with any amendments to it.

I agree to abide by the content of this policy at all times.

Signature:

Date:

**0800 138 1111**

Freephone – including all mobile

**Citizens Advice**
the charity for your communityAvailable OnlineAvailable Online