



Vulnerable customers

A guide for Vulnerable Customers served by Preferred Management

v1.0 – July 2023

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1. Overview

- 1.1 This guide proposes a set of actions that claim Preferred Management can implement to ensure equitable treatment of vulnerable customers, while aligning with the expectations outlined in the Consumer Duty, by offering them the necessary assistance, support, and services.
- 1.2 Preferred Management Solutions is dedicated to upholding equitable treatment for all customers, with a particular focus on vulnerable individuals. Our aim is to provide exceptional customer care and support, ensuring that vulnerable customers receive the assistance they need to achieve fair outcomes from their insurance products and remain well-supported throughout the claims process.
- 1.3 Dealing with insurance companies can often be a source of stress, especially for those who have recently experienced a loss. If a claim service provider (CSP) offers subpar service or adds unnecessary complications for vulnerable customers, it has the potential to exacerbate their already challenging situation..
- 1.4 Anyone can find themselves in circumstances that render them vulnerable, whether it's a temporary or permanent situation. Vulnerability can stem from a variety of factors, such as physical or mental health challenges, specific characteristics like age or literacy skills, or shifts in personal circumstances like the loss of a loved one, unemployment, or changes in household income. The COVID-19 pandemic and the measures taken to safeguard public health have heightened the likelihood of sudden changes in customers' circumstances, potentially leading to increased vulnerability. Additionally, global events can contribute to financial instability among customers, further amplifying their vulnerability.

Our guide puts forward practical measures that claim Preferred Management can consider implementing to ensure equitable treatment of vulnerable customers. It also provides examples of best practices. The guide outlines various actions we take in key areas, including:

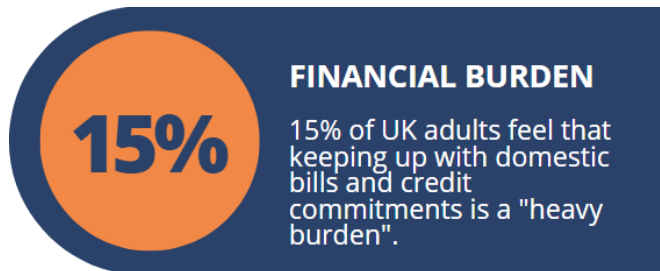
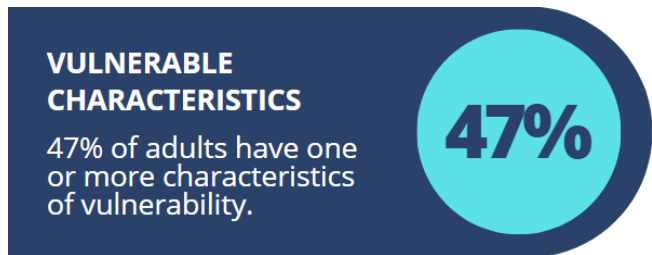
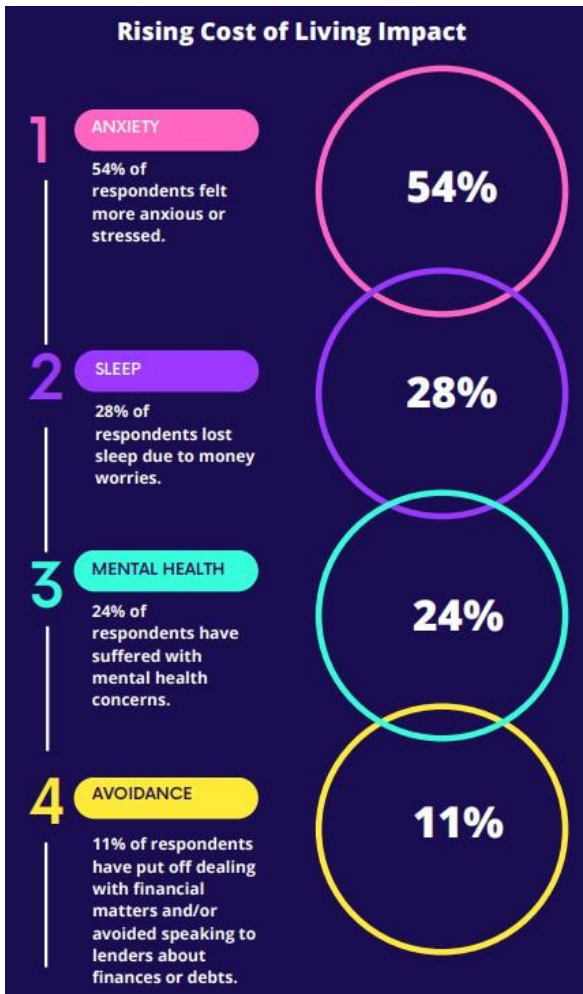
- Developing and publicly disclosing policies and procedures designed to ensure fair treatment of vulnerable customers;
- Recognising and identifying customers who may be in vulnerable circumstances;
- Documenting pertinent information about the specific needs of vulnerable customers;
- Engaging in effective communication with vulnerable customers;
- Providing staff with training and necessary resources; and
- Continuously monitoring and evaluating the effectiveness, including assessing claims and complaints outcomes, to gauge success in serving vulnerable customers.

The guide not only emphasises best practices for equitable treatment of vulnerable customers, including those facing challenges such as debt, victims of crime, or individuals with physical or mental health issues, but it also offers recommendations on how to assist authorised representatives who may be handling matters on their behalf.

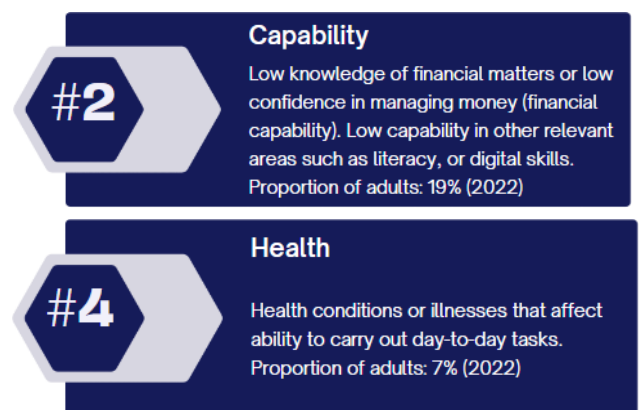
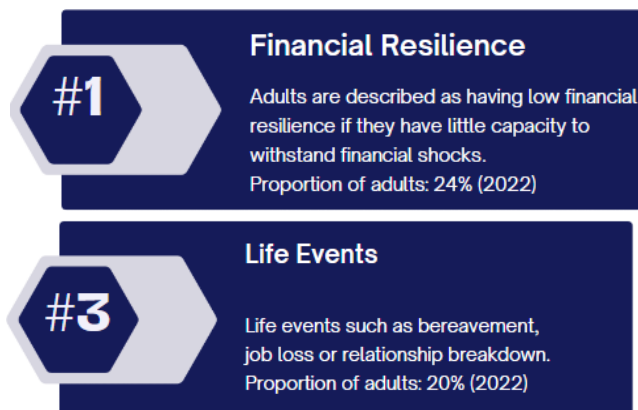
The measures outlined in this guide are not meant to be rigid or all-encompassing and will remain subject to ongoing assessment. We are committed to revisiting and updating the guide in the future and we anticipate regular assessment of our own performance. We take proactive measures to enhance our approach towards serving vulnerable customers. We will actively monitor our performance and controls to ensure we are consistently provide a high standard of service to all customers.

Any queries regarding this guide should be directed to escalations@preferredmanagement.co.uk

Vulnerable Customers – Infographics



Vulnerability – The 4 Drivers



Source:

FCA, [Financial Lives Cost of Living \(Jan 2023\) Recontact Survey](#)

2. Background

- 2.1 Preferred Management Solutions (PMS) is dedicated to upholding equitable treatment for all customers, including those who may be vulnerable, and ensuring that they enjoy equal access to PMS's products and services.
- 2.2 PMS have established effective procedures that take into account the situations of individuals (including small and medium-sized enterprises) and have the capability to identify whether they may be vulnerable or at risk of experiencing harm, whether this condition is permanent or temporary. PMS will then customise its communication and interaction methods to accommodate the vulnerability of these individuals. PMS considers the treatment of vulnerable customers throughout all areas of the end-to-end claim cycle.
- 2.3 The FCA define vulnerable customers as follows:
A vulnerable customer 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.
- 2.4 In the context of implementing the Consumer Duty, the Financial Conduct Authority (FCA) has introduced a novel Consumer Principle, compelling firms to proactively work towards achieving positive outcomes for their retail customers. These regulations necessitate that firms consider the requirements, attributes, and objectives of their customers, including those displaying characteristics of vulnerability, and their behaviour, at all stages of the customer journey. Furthermore, in addition to striving for positive customer outcomes, firms are obligated to comprehend and provide evidence of the extent to which these outcomes are being realised. This guide suggests practical measures to help make sure vulnerable customers are treated fairly and delivering good outcomes for those customers. This guide aims to bring together current examples of good practice.
- 2.5 The suggested measures, as set out in sections 3-7 of this document, cover:
- Formulating and publicly disclosing policies;
 - Treating vulnerable customers fairly;
 - Documenting information;
 - Monitoring performance; and
 - Staff training.
- 2.6 In this document, we use the term 'vulnerable customers' to describe individuals whose circumstances have placed them in a vulnerable position. We acknowledge that various organisations may employ different terminology, and some individuals may prefer not to be characterised as 'vulnerable customers.' Nevertheless, within the context of claims within Preferred Management, this term is widely understood and facilitates transparent and productive discussions on this subject, enabling us to work towards enhancing the experience of customers in the insurance sector.

3. Regulatory framework

PRIN 2.1 The Principles

Principle 12 in the FCA Handbook (effective from 31st July 2023) states as follows:

12. Consumer Duty

A firm must act to deliver good outcomes for retail customers.

4. Scope of this guide

- 4.1 This guide suggests measures that are adopted to help ensure vulnerable customers are treated fairly and give them the help, support and services they need. Our aim is to understand and respond appropriately to the needs of vulnerable customers, including ensuring our staff are equipped to meet these needs.¹

Who the guide is addressed to

- 4.2 All staff members and any suppliers engaged during the claim or complaints lifecycle.

Potential future changes to the guide

- 4.3 We acknowledge that practices in treating vulnerable customers fairly are a dynamic and evolving area, and practices and factors that may influence, such as technological advances and regulatory requirements may change over time. PMS therefore aim to keep up to date with future industry developments.
- 4.4 If we identify alternative or additional measures we think it would be appropriate to include, we might decide to update the guide and would look to work with industry to ensure any changes are clear and appropriate.

5. Establishing and publishing policies

Preferred Management establish, publish and comply with clear and effective policies and procedures for the fair and appropriate treatment of customers whose circumstances may make them vulnerable.

Proactive senior leadership

- 5.1 Senior leaders have a crucial role in ensuring equitable treatment for vulnerable customers. This entails prioritising the fair treatment of vulnerable customers, incorporating it prominently on their agenda, and engaging in regular discussions about it during senior meetings and throughout the organisation.
- 5.2 Preferred Management have designated senior sponsors to supervise their organisation's efforts in this domain. We refrain from placing sole responsibility for overseeing the treatment of vulnerable customers on a single individual. Instead, we recommend that accountability be positioned at a level of seniority and influence that is commensurate with the importance of the matter.
- 5.3 Senior sponsors assume a leadership role in ensuring that the ethos of fairness, particularly concerning vulnerable customers, becomes an integral part of the organisation's culture. This approach will help ensure that the equitable treatment of customers, especially those who are vulnerable, is taken into account across all levels of the organisation.
- 5.4 Furthermore, we promote sponsors actively monitoring their Preferred Management's performance in terms of equitable treatment of vulnerable customers. This monitoring can encompass evaluating staff performance and gathering customer feedback. It will empower them to lead efforts in enhancing outcomes for vulnerable customers by providing insights into areas that require improvement.

Adopting an approach to identify who may be potentially vulnerable.

- 5.5 Various circumstances can serve as indicators that a customer might be vulnerable. These encompass factors such as age, physical or learning disabilities, physical or mental health conditions, limited literacy, communication challenges, low financial capability, or recent changes in circumstances, such as bereavement.
- 5.6 Indeed, this list is not comprehensive, and individuals may face various other circumstances that can lead to vulnerability, including factors like low income, sudden income reductions, job loss, or living in remote and isolated rural areas. Moreover, we recognise that individuals can experience a blend of these circumstances at different points in their lives, and vulnerability can undergo changes over time
- 5.7 Therefore, when crafting policies and procedures to ensure equitable treatment of vulnerable customers, we will adopt an inclusive approach that encompasses a broad spectrum of potential vulnerabilities. This approach accounts for the diverse types of vulnerabilities that their customer base may encounter, acknowledging that these vulnerabilities can emerge suddenly and evolve dynamically, as exemplified by the ongoing challenges posed by the Covid-19 pandemic. Such an inclusive approach ensures that their policies and procedures cater to the extensive array of individuals who may require their assistance, support, and services, enabling us to respond promptly and empathetically to the changing circumstances of their customers.
- 5.8 As the examples provided on page 5 demonstrate, a significant portion of the UK population may either already be vulnerable or have the potential to become vulnerable due to their individual circumstances. Consequently, we maintain an ongoing effort to enhance comprehension of the various challenges that might impact customers. We leverage this understanding when formulating policies and practices, as well as when designing customer-centric processes and procedures. This approach ensures that we remain proactive and responsive to the diverse needs of our clientele.
- 5.9 We may not always have prior knowledge of a customer's vulnerability. Therefore, adopting an inclusive approach in the design of processes and procedures is essential to ensure that a broad spectrum of customers can access improved service, whether or not they have been formally identified as vulnerable.

Publishing policies on treating vulnerable customers fairly

- 5.10 PMS share their policies and procedures regarding the equitable treatment of vulnerable customers. This practice is crucial for establishing explicit expectations and ensuring transparency for customers. When sharing this information, we ensure that it is accurate, up-to-date, and presented in a clear and easily understandable manner.
- 5.11 Information should be intentionally tailored to cater to the requirements of vulnerable individuals. We employ straightforward language, minimise the use of jargon and technical terms, and avoid overcrowding information. Key pieces of information should be emphasised, possibly through the use of bold text or colour coding. We may choose to utilise videos or infographics to elucidate typical claims processes and procedures. Additionally, we may test their communications with vulnerable individuals and/or consumer organisations to ensure that the content is sufficiently clear and engaging for vulnerable customers.

6. Treating vulnerable customers fairly

6.1 This section sets out some suggested measures taken to identify vulnerable customers and treat them fairly.

Identifying vulnerable customers

6.2 The initial step in providing the necessary support to potential vulnerable customers is to identify them. Without effective identification processes, those who require and are entitled to assistance may not receive it, unless services are designed to be truly inclusive..

6.3 We acknowledge that identifying potential vulnerability can pose challenges, particularly when we have limited information about a person's life or circumstances. Additionally, individual circumstances can change at any time. A customer may not be vulnerable when submitting a claim, but shifts in their personal situation could lead to vulnerability in the future.

6.4 So, we raise awareness of the help, support and services available to all customers. This will help customers, especially vulnerable people, to decide if these would be useful to them. Customers might be more willing to share information about a vulnerability if they know they can get extra support from us by doing so. We encourage customers to tell us about any specific accessibility or customer services needs they have, to avoid creating any difficulties to them receiving the help they need. We actively encourage:

- Inquiry with all customers during their initial notification of loss if they have any particular accessibility or customer service requirements that we can assist with
- Proactively furnish customers with information regarding the assistance, support, and services available to those who may be vulnerable or have specific accessibility or customer service needs.
- Clearly elucidate the procedures for customers to access help, support, or services at any time
- Offer multiple channels through which customers can communicate or update information about their vulnerability or specific accessibility and customer service requirements. These channels could include online forms, a dedicated phone number, or a web chat function.
- Inform customers about the outcomes they can anticipate if they share information about their vulnerability, the additional support they are likely to receive as a result, and the topics that are likely to be discussed. This helps manage expectations and reduces concerns and anxiety related to sharing personal details. This information is provided on our website, IVR's and through direct conversations.

- 6.5 It's important to recognise that some individuals may not be comfortable or may feel unable to disclose their vulnerability or specific customer service needs to us. Discussing personal circumstances could induce anxiety or distress for them. Therefore, we provide training to employees to be vigilant for potential characteristics, behaviours, or verbal cues that may indicate a customer's vulnerability. With this awareness, employees can attentively listen to customers and take the initiative to offer or explore the help, support, and services available that may be of benefit to them. This proactive approach enhances our capacity to provide the necessary assistance to vulnerable customers.
- 6.6 As set out in section 5, where we think it would be appropriate to record information about a customer's vulnerability or needs, we do so in line with data protection and GDPR legislation.
- 6.7 It is imperative for us to implement measures aimed at enhancing the ability to identify vulnerable customers, thereby ensuring they receive appropriate help and support. While these measures may not lead to the identification of all vulnerable customers, we anticipate that they will lead to significant improvements in the numbers of those identified in the communications sector.

How we can help vulnerable customers

- 6.8 As detailed in paragraph 3.10, we may not always have prior knowledge of a customer's vulnerability. To address this challenge, in addition to inclusive design, we recommend implementing the following measures for all customers. This approach ensures that a broader spectrum of vulnerable customers receive the necessary assistance, support, and services, even if we unaware of their vulnerability. It also benefits customers who are not presently vulnerable or whose circumstances undergo sudden changes.

Offer a wide range of communication channels

- 6.9 We provide customers with a variety of communication channels that align with their specific needs. These channels are prominently displayed and easily accessible. Communication channels encompass telephone, postal mail, email, webchat, as well as exploring video and text relay services. We offer the option for customers to specify their preferred communication channel, enabling us to consider this preference when reaching out to the customer.
- 6.10 Offering a diverse array of communication channels is essential because customers have varying preferences and needs, often influenced by their individual circumstances or characteristics. For instance, partially sighted or blind customers might prefer a combination of telephone conversations and receiving large print or Braille correspondence through postal mail. Conversely, some individuals may not feel at ease with telephone calls or find receiving postal mail stressful, and therefore, they may prefer digital communication channels. Having a wide range of options ensures that customers can choose the method that best suits their comfort and requirements.

7.

“My hearing has recently deteriorated. I find it hard to communicate as I always use the phone.”

When a customer informs us of their specific requirements, it is crucial to record this information in their file with their consent. Before making any changes to their communication preferences, it's essential to discuss and agree upon suitable alternative communication services, if necessary. In such cases, we may propose alternatives like email or webchat, text relay, recommending compatible hardware (such as hearing aid-compatible telephones), or referring them to specialist organisations, as appropriate.

Make customer interactions a positive experience

- 7.1 We emphasise the creation of positive customer interactions for all clients, with a special emphasis on vulnerable individuals, even when dealing with claim rejections or adjustments in accordance with policy terms.
- 7.2 Frontline staff are trained to communicate with vulnerable customers with empathy and support, and listen carefully to what they say, to help them feel more comfortable in speaking to our team or sharing their customer service needs.
- 7.3 Frequently, minor adjustments in approach can significantly enhance a customer's experience. For instance, prioritising high-quality conversations over call-time targets by allowing more time on a telephone call can be beneficial. We grant customer service advisors flexibility to deviate from scripts when interacting with vulnerable customers. This flexibility ensures that advisors can provide more detailed information or employ a tailored approach that better suits the customer's unique needs.
- 7.4 We also take steps to spare vulnerable customers from the burden of repeatedly explaining their personal circumstances during each contact, which can be both frustrating and distressing. In addition to the information covered in Chapter 5 regarding recording customer information, this can include:
 - Offering direct access to specialist teams or staff members who have undergone specialised training for customers who would benefit from such support.
 - Ensuring that customer service advisors provide clear explanations of what will happen next and the expected timeframes for the next steps in the process. This clarity can alleviate customer concerns and uncertainties.
- 7.5 We actively taking measures to enhance their interactions with customers, demonstrating a commitment to customer-centric practices. Examples of these initiatives include:

- **Advanced Check-Ins:** Prior to scheduling supplier visits, we proactively assess whether a customer might need extra time to answer the door. This consideration helps avoid inconvenience and potential frustration for the customer.
- **Alternative Claims Settlement:** In cases where traditional claims settlement methods may not be suitable for a customer's circumstances, we explore and offer alternative forms of settlement (where allowable). These alternatives are designed to better align with the customer's unique needs and situation.

These efforts reflect a customer-focused approach that aims to make interactions more accommodating and tailored to individual circumstances, ultimately enhancing the overall customer experience.

Being responsive and sensitive to vulnerable circumstances

- 7.6 We exhibit responsiveness and sensitivity when dealing with customers facing vulnerable circumstances.
- 7.7 In such situations, we will demonstrate patience and empathy, concentrating solely on gathering the necessary information.

Provide clear accessible written communications

- 7.8 We ensure their critical written communications, such as letters, emails, and web chat messages, are easily understandable and use plain language whenever feasible. It's important to recognise that some customers may have lower literacy levels or health conditions that can impact their information processing abilities.
- 7.9 Whenever feasible, we customise content to align with the specific requirements of individual customers. It's important to provide clear instructions when there is a customer action required, such as reaching out, submitting supporting evidence, or making an excess payment. If applicable, written communications should also include information about the assistance, support, and services accessible to vulnerable customer groups. This helps ensure that customers are well-informed and can access the help they may need.
- 7.10 Many individuals rely on the internet to access information. To better serve our customers, we ensure that our website and portals are user-friendly and straightforward to navigate. These online platforms provide valuable information and offer easy access to assistance, support, and services. We are mindful of the terminology used for information titles and search terms, as words like 'vulnerability' or 'accessibility' may not be readily understood by all customers. Clear and relatable language are employed to enhance accessibility and ensure that customers can easily find the information they need.
- 7.11 We conduct regular reviews of communications, especially those that are frequently used, to ensure their effectiveness and relevance. These reviews take into account feedback from customers and incorporate best practices recommended by charities and consumer advocacy groups. Furthermore, we benefit from testing communications with a diverse range of customers, including those with varying accessibility needs, cognitive challenges, and literacy levels, where feasible. This inclusive approach can

help ensure that communications are accessible and meaningful to a broad spectrum of customers.

Offer follow-up information in writing

- 7.12 Providing written information or a summary of agreed actions following a telephone call or web chat can be highly beneficial for some individuals. This approach allows customers to review and digest the information at their own pace. It can be particularly helpful for those who may not remember details well, have memory-related health conditions, or find it challenging to process information in real-time, especially during telephone conversations. Offering this written recap via email, letter, or SMS can significantly improve the customer experience and ensure that information is retained and understood.
- 7.13 Therefore, we proactively offer written follow-up information at the conclusion of conversations with vulnerable customers who may find it beneficial. Ensuring that customers are aware of this option and can readily access it empowers them to utilise this service when it aligns with their needs and preferences. This approach enhances customer support and ensures that critical information is accessible and retained.
- 7.14 Providing written follow-up information will prove valuable to many individuals, particularly those in vulnerable situations. When relevant, this written follow-up should encompass details regarding the next steps in the claim or complaint process, any additional information required to advance the claim, and information about the suppliers involved throughout the claims journey. This approach ensures that customers, including vulnerable individuals, have access to comprehensive and clear guidance, enhancing their understanding and engagement with the process.
- 7.15 We assign specialised team members, who have received additional training in handling specific requests, to address such requests. Specialised training equips staff with the expertise needed to effectively assist customers with unique needs, ensuring a more tailored and supportive experience.

Promote the extra help, support and services that are available

“I’m 92 and don’t see or hear too well anymore, and I didn’t catch everything you said on this call, but I’m sure it’s going to be fine.”

Effective customer service involves several essential components. This includes agents recording the customer's unique accessibility and communication requirements in accordance with data protection regulations. It also entails showing empathy towards the customer, recognising the potential need for extended conversation time, and the option to provide a written summary following the call, particularly in cases where the customer has made adjustments or subscribed to additional services. Additionally, we will inform customers about the available assistance, support, and services, including text relay and accessible communication formats.

- 7.16 We proactively remind existing customers of the availability of assistance, support, and services on a regular basis. For instance, a message could be conveyed as follows: *"Please don't hesitate to reach out if you require additional support. Whether you are elderly, have disabilities, or possess specific requirements, we are here to assist. Your confidentiality is assured, and we are committed to providing the assistance you require." This proactive approach ensures that customers are aware of the available support and are encouraged to seek it when needed.*

Implement specialist customer service teams /staff members who can help

- 7.17 We have established a specialised workflow for assisting vulnerable customers. This flow separates work to address specific customer issues, such as handling reasonable adjustments and mental health concerns etc. This dedicated approach ensures that customers with unique needs receive tailored support and expertise when required.
- 7.18 When a vulnerable customer's needs can be better addressed by a specialist, it's essential to make this referral as promptly as possible. Staff receive training to discern how and when to refer customers to specialised or staff members who have expertise in handling specific issues related to vulnerability. This training ensures that customers receive the most appropriate and specialised assistance for their unique requirements, enhancing the overall customer experience and support.
- 7.19 We recommend that specialist staff members allocate the necessary time to serve particular customers, irrespective of the communication channel being utilised. Additionally, we empower specialist staff to provide flexible solutions to individuals with specific customer service requirements. This flexibility ensures that customers receive personalised and effective support, regardless of their unique needs, contributing to a more positive and accommodating customer experience.

Signpost other organisations that support vulnerable customers

- 7.20 In certain situations, it may be appropriate to refer customers to third-party organisations such as Citizens Advice, debt charities, mental health charities, or the Samaritans. These organisations are often better equipped to offer specialised help and support that goes beyond the scope of our services. Referring customers to these expert resources ensures that they receive the most suitable and comprehensive assistance for their specific needs, further enhancing the quality of support provided.
- 7.21 We strongly encourage our staff to actively promote third-party organisations and services during their interactions with customers or provide links to valuable information. By doing so, we enable our customers to become aware of these services and have the option to reach out to the relevant organisations when they are ready to do so. This approach fosters a supportive and proactive environment that empowers customers to access the additional help and resources they may require.
- 7.22 We establish well-defined procedures for signposting customers to third-party organisations. Furthermore, we provide comprehensive training to staff to ensure they are knowledgeable about the various organisations available and are equipped to determine when and how to appropriately refer customers to these external resources. Clear procedures and staff training in this regard are crucial for effective and responsible customer support.

Help third parties, such as relatives or carers, who are supporting vulnerable customers

- 7.23 Vulnerable customers often receive assistance from individuals like family members, caregivers, or consumer organisations. We adopt a practical approach to communication when necessary, allowing these individuals or organisations to address customer queries or issues on their behalf. Of course, this should be done while adhering to reasonable verification and consent procedures, as exemplified in the following boxed example.
- 7.24 This involves ensuring that staff are knowledgeable about the various types of third parties that can act on a customer's behalf, the ways in which they can do so, and the underlying criteria for such actions. It's important to recognise that, in addition to trusted friends and family members, organisations specialising in supporting vulnerable customers can also serve as third parties. If specialist staff or teams handle these matters, frontline staff should receive training on when to appropriately refer customers to these specialists. This comprehensive understanding and training are essential for providing effective support to customers in need of third-party assistance.
- 7.25 Our procedures align with the legal framework governing mental capacity and decision-making, which includes considerations of powers of attorney. It's important to acknowledge that mental capacity can vary over time. We ensure that frontline staff receive appropriate training in dealing with various types of third-party representatives. This training equips staff with the knowledge and skills needed to navigate the complexities of decision-making in a manner that complies with legal requirements and respects the rights and needs of vulnerable customers.

8. Recording information

“My brother has suffered a head injury and can no longer manage his own affairs. Finalising the deputyship order is likely to take two or three months. In the meantime, his claim needs to be finalised.

We would expect to speak to the person representing the customer with compassion and empathy. We would also use suitable verification methods, for example, asking to see paperwork regarding the deputyship order. In relation to the claim, good customer service could include us allowing the claim to be frozen for an initial period (at least as long as it takes to obtain the deputyship order).

This section outlines recommended measures regarding the recording of information about the needs of vulnerable customers.

Recording vulnerable customers' needs

- 8.1 Policies and procedures should explicitly and in detail, how we record information about the specific needs of vulnerable customers. Understanding and documenting customer needs is essential for providing appropriate support and services. Additionally, capturing this information can us in identifying potential areas for improvement in their existing services. It's crucial to emphasise that when collecting this information, frontline staff should demonstrate patience, empathy, and sensitivity toward the customer and their unique circumstances.
- 8.2 As previously described, we encourage customers to share their specific accessibility or customer service needs, which in turn helps identify vulnerable customers and ensures they receive the additional help, support, or services they require. To prevent customers from having to repeat themselves when transferred to another person or department, we have implemented measures such as discreetly passing on relevant information after confirming with the customer that they are comfortable with this approach.
- 8.3 Our frontline staff accurately record customers' needs and any relevant personal information disclosed by the customer, provided it aligns with data protection legislation. It may be beneficial for staff to inform the customer that they are making these notes to help streamline future interactions and avoid redundant information sharing. We also ensure that this recorded information is visible to other frontline staff on internal systems while maintaining appropriate access controls to safeguard customer privacy and data security. To support accuracy, frontline staff check if a customer's circumstances have changed by making use of opportunities to discuss this with them. For example, if a member of staff gets in touch with a customer to discuss

their claim or complaint, they could take a moment to ask if the customer has any specific accessibility or customer service needs or, if they have already recorded specific needs, check if these are still relevant to the customer.

- 8.4 We promptly update our systems when we become aware that a customer is no longer vulnerable or no longer has specific customer service needs. Accurate and up-to-date recording of information can significantly reduce the need for customers to repeatedly provide personal information during each interaction, which can be frustrating and distressing. When we determine it is appropriate to record information about a customer's vulnerability or specific needs, we do so in strict compliance with data protection legislation. Examples of such information may include noting a customer's preference for receiving paper documents in large print or Braille or indicating the need for longer telephone calls. Our systems are designed to capture and easily amend this type of information as necessary.

“I suffer from cerebral palsy and every time I contact my claim service provider; I have to repeat myself and ask them to take a bit longer on the call with me.”

Good customer service could include actively listening to the customer and recording the customer's needs accurately on their system the first time they are told (subject to data protection legislation). This will enable us to meet the customer's needs and offer a better service, and avoid the customer having to repeat themselves each time they contact us. We ensure the customer is given more time on telephone calls, as they have requested.

Data protection considerations

- 8.5. When recording information about customers, we adhere to applicable data protection legislation, including the General Data Protection Regulation (GDPR), ensuring that the information is accurate, relevant, and limited to what is necessary. We have implemented measures to ensure that we record, store, use, process, and protect this information in strict accordance with data protection legislation. Before recording personal data, we establish an appropriate legal basis and, where special category data may be involved, identify a condition for processing.
- 8.6. We would consult other relevant guidance provided by the Information Commissioner's Office (ICO) regarding the rights of data subjects.
- 8.7. According to data protection legislation, we required to provide customers with information about what to expect when their personal information is collected, as well as their rights, including the right to withdraw consent and to control the processing of their information. This information is presented in a concise, transparent, intelligible, and easily accessible manner. The ICO has issued comprehensive information regarding the customer's right to be informed. Our policies and procedures aim to reflect this and appropriately reference our published privacy information.

9. Monitoring performance

9.1 In this section, we consider measures on how to systematically monitor and assess the impact and effectiveness of policies and procedures aimed at ensuring fair treatment of vulnerable customers.

Evaluating staff performance

9.2 As mentioned earlier, senior management should actively participate in monitoring our organisation's performance in treating vulnerable customers fairly. This involvement ensures that we maintain clear oversight of the service being provided and can initiate improvements when necessary.

9.3 We typically engage in monitoring the service delivered to customers by our employees. We agree that such monitoring encompasses an assessment of the quality of customer service provided to vulnerable customers.

9.4 In terms of evaluating the performance of frontline staff, we consider the following practices:

- Incorporate Vulnerable Customer Measures: Integrate metrics related to the service provided to vulnerable customers into performance evaluations. This is part of our regular reporting processes or similar review mechanisms.
- Random Quality Assurance Assessments: We conduct regular and periodic random quality assurance evaluations to ensure that vulnerable customers are receiving the correct information and services. These assessments are conducted at different points in the customer journey, including instances involving disclosures of vulnerability or escalations to specialist teams / workflows.
- Call Monitoring: Our system supports call monitoring to verify that frontline staff consistently deliver high-quality customer service, particularly to vulnerable customers.
- Avoid Penalising Time Spent with Vulnerable Customers: We ensure that staff are not penalised for dedicating additional time to engage with vulnerable customers, as this may be necessary to provide adequate support.
- Recognition and Rewards: Acknowledge and reward employees who excel in delivering exceptional service to vulnerable customers, particularly in response to positive customer feedback.
- Comprehensive Feedback and Coaching: We provide thorough feedback and coaching to employees, highlighting areas of success and areas requiring improvement. We consider whether additional training or development opportunities would be beneficial to enhance performance.

These practices collectively contribute to ongoing performance evaluation and improvement, ensuring that frontline staff consistently provide high-quality support to vulnerable customers.

Gathering and using customer feedback

- 9.5 We gather feedback from customers, including those who may be vulnerable, as a valuable resource for enhancing customer service specifically for vulnerable customers. This feedback is derived from various sources, including data gathered from customer satisfaction surveys and complaints, as well as insights obtained from social media channels and online forums such as TrustPilot.
- 9.6 Frontline staff often possess valuable insights and suggestions for improving customer service, particularly for vulnerable customers. We regularly seek input from staff based on customer feedback through initiatives such as focus groups, staff surveys, or internal forums. These communication channels are accessible to all staff, and where appropriate, options for anonymous issue reporting are provided. Such channels can also facilitate discussions about concerns, sharing of best practices, and the exchange of tips for delivering exceptional customer service.
- 9.7 Feedback, whether from customers or staff, serves as a critical tool for identifying areas where we may fall short of expectations and where improvements are necessary to consistently deliver a high level of customer service, especially for vulnerable individuals.
- 9.8 We make effective use of customer feedback by implementing the following practices:
- Regular Monitoring of Feedback: Consistently monitor changes in complaint levels, customer service survey results, or other forms of customer feedback.
 - Root-Cause Analysis: We conduct root-cause analysis when potential shortcomings or concerns are identified through feedback.
 - Direct Engagement with Vulnerable Customers: We engage in direct conversations with vulnerable customers who have lodged complaints to gain an in-depth understanding of how their experiences could have been better managed. This approach goes beyond high-level feedback and provides valuable insights.
 - Collaboration with Customer Panels: Collaborate with panels of customers who have specific or additional customer service needs when implementing changes or new initiatives. This ensures that the proposed changes are fit for purpose and genuinely beneficial.
 - Partnership with Consumer Bodies: We aim to work more closely with consumer bodies that have expertise in serving vulnerable groups and make use of their published resources for guidance.
 - Incorporate Feedback into Staff Training: We utilise customer feedback as a tool in staff training to convey real customer experiences and enhance training materials, providing a practical and impactful learning experience.
- 9.9 PMS has outlined its expectations regarding monitoring customer outcomes as part of the Consumer Duty implementation. We refer to this guidance when developing and implementing performance monitoring programs. This reference can help ensure alignment with industry standards and best practices in monitoring customer outcomes and compliance with the Consumer Duty.

10. Staff training

- 10.1 In this section, we provide recommended measures to consider when implementing staff training programs aimed at ensuring fair treatment of vulnerable customers. These measures are designed to enhance the knowledge and skills of frontline staff in effectively supporting vulnerable individuals.

Delivering effective training to all staff

- 10.2 Staff training is of paramount importance as it equips employees with the necessary skills and confidence to deliver a high level of service to customers, particularly to vulnerable individuals.
- 10.3 The extent of training that a staff member receives may vary depending on their specific role within the organisation. Different roles may require distinct training programs tailored to their responsibilities in serving vulnerable customers

Content of training

All staff

- 10.4 It is crucial for all employees to possess an understanding and awareness of the challenges and issues faced by our customer base. This awareness enables them to consider the needs of vulnerable customers when making decisions related to product design, implementing new initiatives, or engaging in other commercial activities.
- 10.5 Therefore, we provide training to all staff members regarding policies and procedures for treating vulnerable customers fairly. This training emphasises the availability of additional support for vulnerable customers and may include examples of circumstances that could lead to someone becoming vulnerable, as well as the challenges faced by vulnerable customers. Such training initiatives contribute to fostering a corporate culture centered on fairness and inclusivity.

Frontline staff

- 10.6 Customer service representatives, including those located in office settings or other locations, our suppliers, and third-party contractors, are more likely to interact with vulnerable customers or individuals with specific customer service needs. Therefore, we commit to them receiving comprehensive and specialised training. For these employees, training will encompass the following key topics:
- Overview of Vulnerability: An understanding of the various personal circumstances that may lead someone to become vulnerable, including the potential impact of these circumstances.
 - Identification of Vulnerable Customers: Techniques for identifying customers who may be vulnerable or who could benefit from specific assistance, support, or accessibility services. This includes active listening skills and the ability to ask relevant questions when appropriate.

- Empathic Communication: Training on empathetic communication techniques specifically tailored to interact effectively with vulnerable customers.
- Communication Methods and Assistive Technology: Familiarity with various communication methods available, including how assistive technology and services function. This includes understanding tools like text relay and video relay for employees who may engage with customers using these methods.
- Additional Support Services: Awareness of additional services that can be offered to individuals who may be vulnerable or require specific support, including services provided by third-party organisations. Employees should understand how these services can benefit these individuals.
- Referral Process: How to refer customers promptly and seamlessly to specialised staff in this area when they cannot address a query, ensuring minimal delay or inconvenience for the customer.
- Role in Meeting Obligations: An understanding of how their role contributes to their organisation's obligations to its customers and its commitment to delivering an exceptional customer experience to all individuals.

This specialised training equips frontline employees with the knowledge and skills required to provide exceptional support to vulnerable customers and individuals with specific customer service needs, promoting a culture of inclusivity and fairness.

- 10.7 Staff training should give any employees who have contact with customers the ability and confidence to help and support them and provide a level of service that meets their needs.

Specialist staff and workflows

- 10.8 Specialised staff or those workflows designed in assisting vulnerable customers may require additional training tailored to their unique roles. Depending on their level of experience, these employees might benefit from specific supplementary training beyond what is provided to all or frontline staff. We commit to providing this additional training and guidance.
- 10.9 Specialised teams focusing on communication with vulnerable customers may also benefit from extra training. In addition to receiving specialised training, which may be delivered by charitable organisations, these teams engage in knowledge sharing about handling more complex cases and assess opportunities for improving the overall customer experience (refer to the monitoring chapter for related considerations). Frontline staff can redirect customer contacts to these specialised teams when specific expertise is needed.
- 10.10 We further recommend delivering additional training to frontline staff who engage with customers facing financial difficulties. This is particularly important as individuals dealing with problem debt are more likely to be vulnerable, and their customer service needs tend to be more intricate. Specialised training can equip agents with the empathy and skills necessary to understand the unique circumstances of these individuals and provide enhanced support.

Frequency and evaluation of training

- 10.11 Given that our range of services may evolve over time, we conduct regular reviews of their training materials. Updates should also be made in anticipation of any significant changes to the services offered to customers.
- 10.12 To ensure that staff members maintain up-to-date knowledge, they can be encouraged to periodically refresh their training. This can be achieved through activities such as retaking training modules or engaging in other forms of knowledge refreshment, including briefings, seminars, or internal events.
- 10.13 We incorporate an evaluation mechanism at the conclusion of their training to verify that it has been comprehended and effectively implemented by staff members. This assessment helps ensure that the training meets its intended goals and contributes to a well-informed and capable workforce.

Providing resources for staff

- 10.14 Frontline staff may not be frequently queried about the various forms of assistance, support, or services offered Preferred. Therefore, we ensure that staff have access to suitable resources and reference materials. This equips them with the knowledge and confidence to effectively communicate with vulnerable customers. Such resources may encompass:
- a) A centralised training section including resources related to vulnerable customers. This platform includes links to additional external services that staff can access in real-time. These resources may comprise call-handling scripts, internal guidance, useful links to information generated by our training team, external organisations, and relevant telephone numbers. This comprehensive reference hub enables staff to access essential information swiftly and efficiently while assisting vulnerable customers.
 - b) Designating internal vulnerability 'champions' or representatives who can play a key role in enhancing knowledge and awareness at a local level. This will be lead by a senior manager, dedicated to the handling of vulnerable customers as detailed within this document. Individuals may be responsible for reporting relevant information to senior staff members, ensuring that the organisation remains attuned to the needs of vulnerable customers and continuously improves its approach to serving them. These champions act as advocates and resources for both staff and customers, fostering a culture of support and inclusivity.
- 10.15 We proactively ensure that the search functions within internal systems yield relevant and useful information when employees use common words or phrases in their searches. It is essential to address any deficiencies in system performance in this regard and take necessary measures to improve search functionality. This ensures that staff can quickly access the information they need to effectively assist vulnerable customers.

Collaborating with consumer bodies and charities

- 10.16 Collaborating with consumer bodies and charities can be beneficial when developing training programs. These partnerships can provide valuable real-life customer insights and specialist knowledge, enriching staff training with practical experiences and ensuring the use of appropriate language and approaches in addressing customer vulnerability. This collaborative effort enhances the effectiveness of training programs and promotes a more inclusive and customer-focused approach within our organisation.