



Vulnerable Customers Statement

1. Policy statement

We are committed to identifying, assessing and managing vulnerable customers in accordance with our own objectives and policy, as well as any regulations and guidelines set out by our regulators.

Implemented are several identification and assessment tools within the procedure section of this document, aimed at identifying, assessing and dealing with all Vulnerable Customer situations and to consistently ensure that our staff are aware of, and knowledgeable about Vulnerable Customers, including how to handle all situations.

2. Purpose

We are committed to ensuring that all of our customers are treated fairly and we meet all of their needs to the best of our ability.

We appreciate that sometimes our customers may be vulnerable as a result of a physical or mental health condition suffered by themselves or a family member, age, illiteracy, or if their first language is not English.

This means that we may have to treat vulnerable customers according to their individual circumstances. In order to do so we have employed staff with experience of sales and customer service and given them the necessary training to enable them to identify the signs of vulnerability and how to proceed with that customer.

We ensure that our staff have the necessary training, knowledge, understanding and support in order to be able to identify the potential signs of a vulnerable customer in their dealings with them, and then tailor their approach accordingly.

3. Scope and definition

Vulnerability is an extremely subjective area, however our staff are constantly on the lookout for potential signs, such as, a lack of understanding, communication issues and unusual or erratic behaviour.

The FCA defines 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.”

The vast majority of our communication with customers is face to face and, in some instances, over the phone, which does however make it easier for our staff to be able to identify both short term

causes of vulnerability, such as short-term illnesses or a bereavement, as well as long-term causes, such as mental illness or a disability.

4. Processes and procedures

If a member of staff believes that a customer could potentially be vulnerable then they will ask non-intrusive questions in order to understand the customer's circumstances, allowing them to identify if the customer is in fact vulnerable and how our approach will need to be tailored for that customer.

Any information gathered will be processed in line with GDPR and the Data Protection Act 2018. Where necessary, explicit consent will be obtained from a customer to enable us to process the details of their vulnerability accordingly. Customers will also be fully informed of how we will process this information.

We will always:

- Ask for a customer's explicit consent in order to record, store or process the details of their vulnerability, where it is necessary and appropriate to do so
- Clearly explain to the customer why we need to record, store or process the details of their vulnerability
- Clearly explain to the customer who the details of their vulnerability will be shared with

Typically, we would only look to process the details of a customer's vulnerability where we may need to tailor our approach during our communications with them, or when we are entering their home for the purposes of a sales consultation or installation. We would therefore only share the details of the vulnerability with the relevant staff and representatives.

All staff are provided with the training and tools to identify, understand and deal with vulnerabilities and vulnerable customers, this training is delivered on commencement of employment and is refreshed annually.

The various methods for customers to contact us are clearly visible on all communications and our website and provide a choice of ways to communicate with us,

o Post

o Email

o Face to Face

o Telephone

All our communications verbally or written material is clear, to the point and jargon free.

Where applicable, we try our best to ensure the products/services that we offer are flexible and made to suit the customers' needs and requirements and where possible deal with the customer's authorised third-party in a helpful and transparent manner.

All sales visits are followed up with a telephone call and in writing and the benefits and consequences of any product/service are fully explained along with any legal implications.

Where we feel it is needed, additional time is provided between the sales call, written follow up and contractual agreement to allow the customer time to communicate with a third-party and understand the content of the product/service offered.

We ensure that all of our customers do not make a purchase with us or enter into a credit agreement with one of our lender partners without fully understanding what they are entering in to.

When presenting finance options to our customers we do so using our electronic choice of funding software (eCOF) which describes the products clearly and displays the breakdown of each product to the customer. A copy of the bespoke choice of funding is then emailed directly to the customer. Sales representatives also talk through this with customers and explain verbally the information which has been emailed to them.

If we believe that the customer is not fully aware of what they are entering in to then we will:

- Not continue with the sale of any products or services.
- Not continue with any application for credit to fund a purchase.
- Ask if a friend or family member is available to assist the customer, or we will arrange a follow-up appointment when a friend or family member is available.
- Provide the customer with all relevant information in a clear, fair and not misleading manner, allowing them to make an informed decision.
- Not refuse to deal with an individual due to their vulnerability. Instead we will work with them to ensure they are treated fairly.
- Not label different demographics or individuals as vulnerable without understanding their situation. We accept that no two people are the same and each individual should be handled on a case by case basis.
- Where appropriate, we may also signpost customers to agencies such as Citizens Advice or Age Concern UK to seek further guidance and support.

5. Monitoring and reviews

The Company carries out regular internal audits and gap analysis monitoring on all business practices and procedures to ensure that our customers, not just those of vulnerable customers objectives are being met.

Regular reviews of the audit results are held with senior management and an ongoing record of gaps, actions and improvements are maintained.

6. Responsibilities

The Company ensure that all staff are provided with the time, resources and support to learn, understand and implement the Vulnerable Customers procedures and associated policy into their business practices. Senior Management are responsible for a top-down approach and in ensuring that all staff are included.