



**Staff needs to be able to identify vulnerable Consumers. Risk factors which contribute to Vulnerability can include:**

- Bereavement
- Illiteracy
- Illness
- Disability or other impairment.

More than risk factor can increase customer vulnerability. Staff should be alert to the fact that a person that they are dealing with may not have full capacity at that particular moment in time and so may not be able to make an informed decision about the services we are offering. Staff needs to listen carefully, identify needs and adjust their approach accordingly. Typical signs to look out for that show that a consumer may have a vulnerability:

- They ask you to speak up or speak more slowly
- Can they hear the complete conversation or are they missing important bits?
- Do they understand what you are saying?
- They appear confused
- Do they know what is being discussed?
- Do they ask unrelated questions?
- Do they keep wandering off the point in the discussion and talking about irrelevancies or things that don't make sense?
- Do they keep repeating themselves?
- Do they say 'Yes' in answer to a question when it is clear they haven't listened or understood?
- They take a long time to get to the phone and sound flustered or out of breath, indicating they may have a lack of mobility due to age or illness
- They take a long time to answer questions
- They say "My son/daughter/wife/husband deals with these things for me"
- Where there is a language barrier they are vulnerable as they may not fully understand what is being said to them
- They say that they don't understand their bill, a previous phone conversation or recent correspondence.

**From a practical point of view, when dealing with vulnerable consumers, staff should:**

- Speak clearly and enunciate

- Set expectations for the call – outline all the information that will be required – account numbers, personal details, etc – and how long the call is likely to last
- Be patient / empathise
- Don't rush them – if they need to put the phone down to find account details it could take them some time
- Guide the call to keep it 'on topic'
- Don't assume that you know what the consumer needs – it's easy to rush through if the consumer is slow or not able to explain what they need
- Clarify understanding at every point posing the question "is there anything you'd like me to explain?"
- Ask the consumer to explain to you what they understand the agreement to be
- Offer alternatives to dealing with things by phone – maybe they would prefer to transact the business by post or email
- Don't assume that the person you are talking to is sighted – they may be unable to read details or small print
- Don't assume that the person you are talking to can hear everything you are saying – they may have a hearing impairment
- Remember that vulnerable consumers can sometimes be forgetful or overly trusting
- Give the consumer time to explain fully – don't interrupt or show impatience
- Listen to what isn't being said, not just what is – e.g. absence of price, commitment, timing type questions on the part of the person receiving the call should ring alarm bells
- Ask if there is a better time to call – e.g. some people will function better in afternoons than mornings
- Ask whether there is anyone else they need to talk to before making the decision.
- Do they understand the consequences of making, or not making, this decision?
- Can they understand and process information about the decision? And can they use it to help them make a decision?
- Be careful to distinguish between verbal cues and agreement e.g. 'oh yes' could mean 'I'm listening' not 'I'd like to go ahead'
- Ask the following questions: "do you need to discuss this with anyone else" / "would you like me to explain any part of this call again" / "did you want to think about this before making a decision" / "is there anything we can do to help you deal with us"
- If they say something that suggests they don't fully understand what you have said, be prepared to repeat or paraphrase to clarify understanding
- Don't assume that they fully understand all the implications of the offer/agreement.
- Explicitly and clearly confirm all the important information
- Make sure that the consumer is not flustered, agitated or in an emotional state when they make a decision