

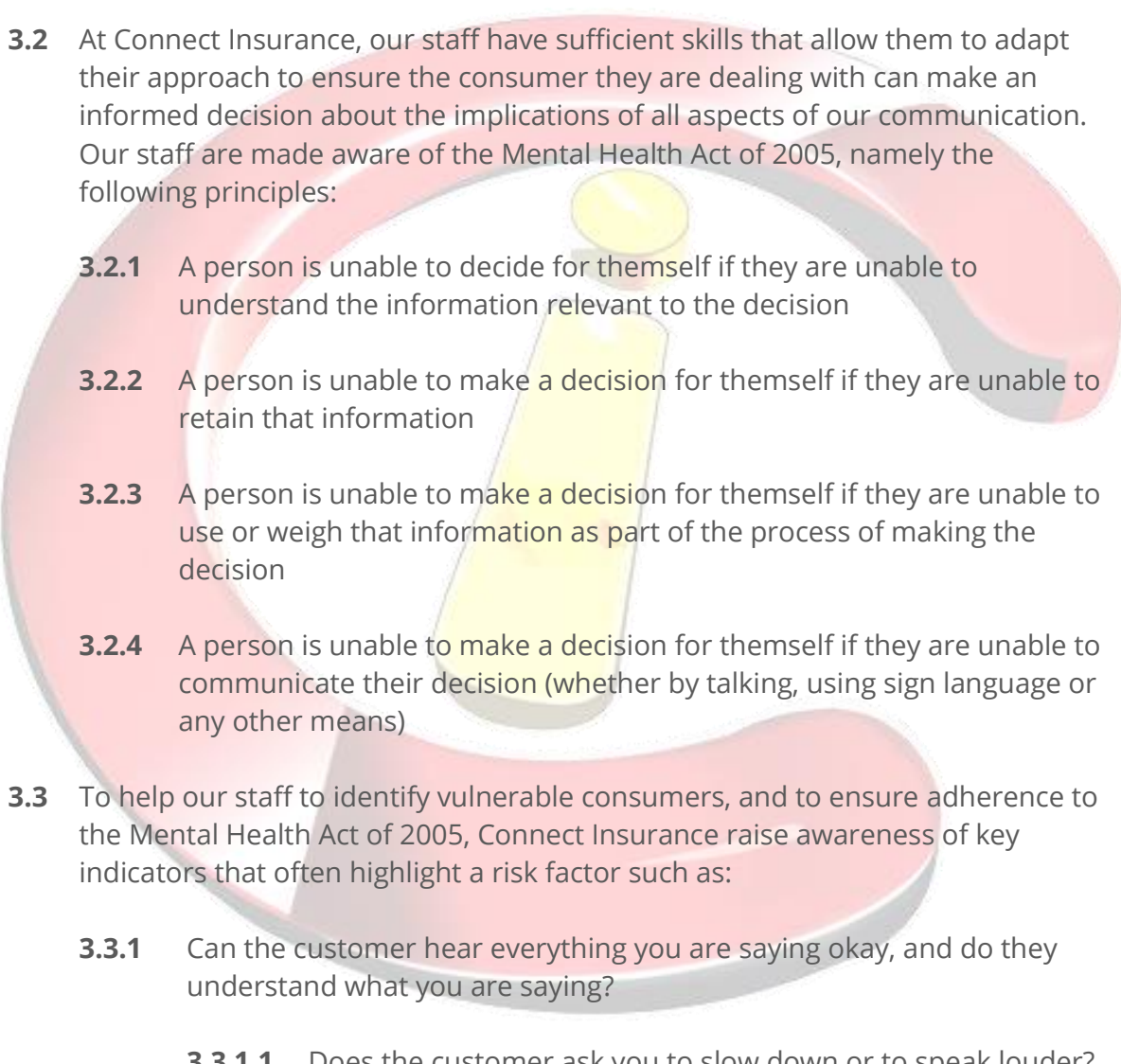
### Scope

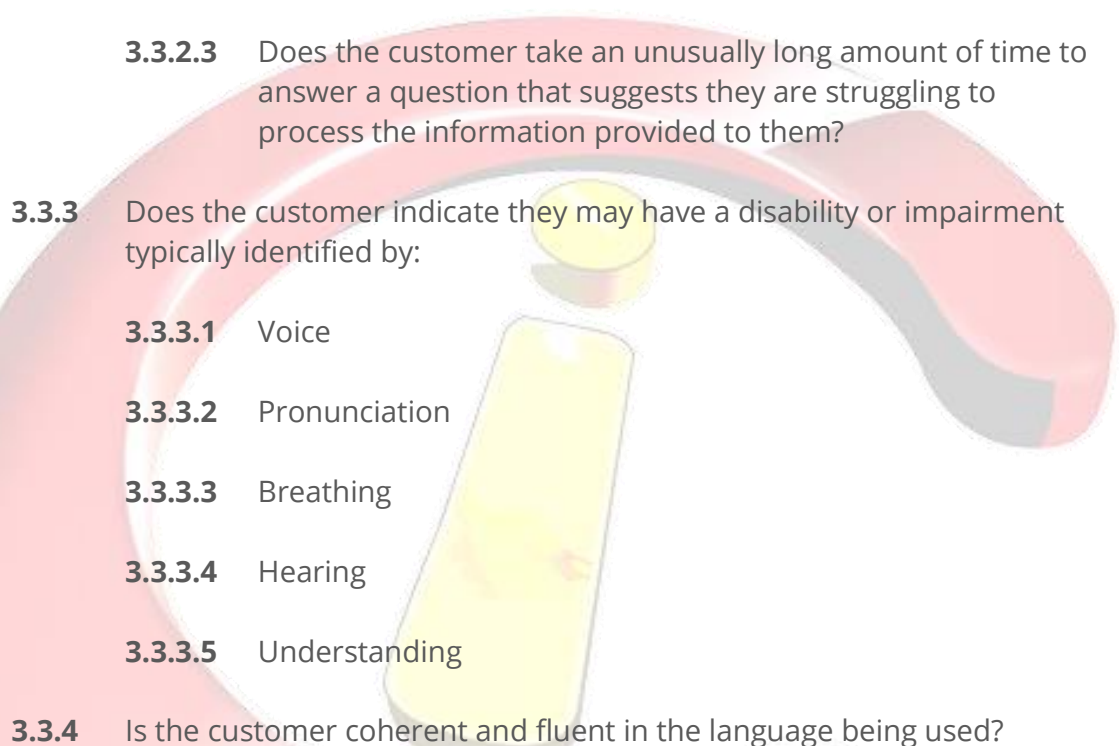
- 1.1** A vulnerable consumer is defined as someone who has personal circumstances that place them at a higher risk of detriment, more so if a company does not act with the appropriate level of care.
- 1.2** The majority of consumer protection legislation assumes an average level of expectation, understanding and behaviour from the consumer, however vulnerable consumers may struggle to represent their own interests and as a result suffer more harm than a typical client would.
- 1.3** This policy applies to all employees of Connect Insurance. We make it an utmost priority to ensure all our staff can identify vulnerable consumers, and that they are able to handle the situation with the required levels of care, attention, and respect.

### Exposure

- 2.1** In any market sector that deals with the public, there will be instances where a consumer may find it difficult to make an informed decision about their available options.
- 2.2** As the population becomes more diverse, language barriers become a common problem whereby a consumer may struggle to understand terminology, especially technical language used in the insurance industry.
- 2.3** Other typically encountered scenarios include:
  - 2.3.1** Customers who are illiterate.
  - 2.3.2** Customers suffering from anxiety or dementia.
  - 2.3.3** Customers with disabilities that affect sight, hearing, or speech.
  - 2.3.4** Neurodivergent customers such as those with dyslexia or autism.
- 2.4** In the insurance industry consumers are often contacted via phone in relation to their policies to discuss any issues, amendments and offers. The ongoing contact with a consumer is paramount to providing good customer service and ensuring the consumer is aware of any details relevant to their policy; resultantly it is very important that Connect Insurance ensure our vulnerable clients can fully understand our communications to maintain fairness and equality of service to all of our clients.

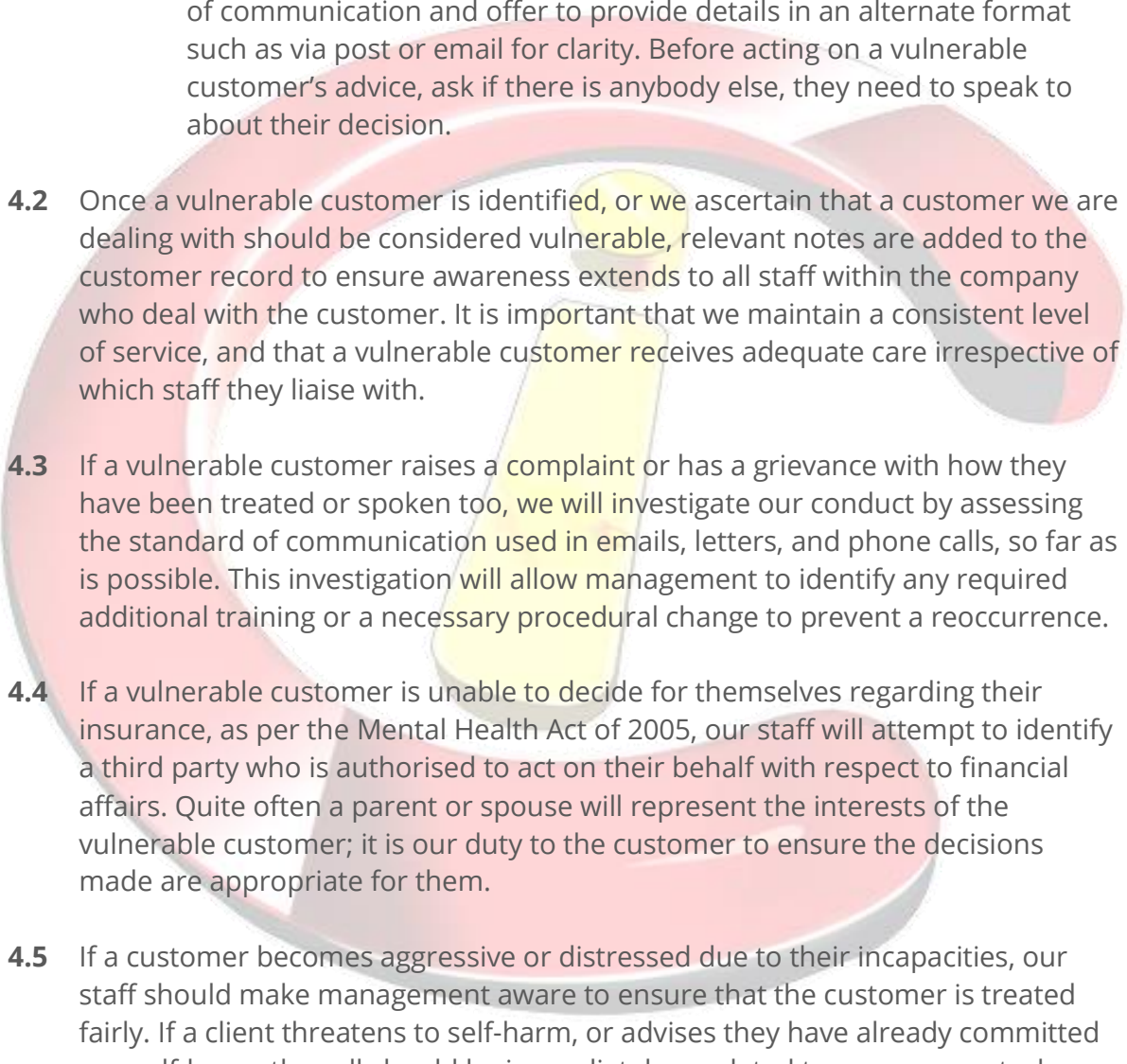
### Recognising

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- 3.1** For our staff to correctly address the needs of a vulnerable consumer, it is important to be able to identify them. Risk factors that can help to identify a vulnerable consumer include illness, disability, illiteracy, bereavement, and other impairments.
- 3.2** At Connect Insurance, our staff have sufficient skills that allow them to adapt their approach to ensure the consumer they are dealing with can make an informed decision about the implications of all aspects of our communication. Our staff are made aware of the Mental Health Act of 2005, namely the following principles:
- 3.2.1** A person is unable to decide for themselves if they are unable to understand the information relevant to the decision
  - 3.2.2** A person is unable to make a decision for themselves if they are unable to retain that information
  - 3.2.3** A person is unable to make a decision for themselves if they are unable to use or weigh that information as part of the process of making the decision
  - 3.2.4** A person is unable to make a decision for themselves if they are unable to communicate their decision (whether by talking, using sign language or any other means)
- 3.3** To help our staff to identify vulnerable consumers, and to ensure adherence to the Mental Health Act of 2005, Connect Insurance raise awareness of key indicators that often highlight a risk factor such as:
- 3.3.1** Can the customer hear everything you are saying okay, and do they understand what you are saying?
    - 3.3.1.1** Does the customer ask you to slow down or to speak louder?
    - 3.3.1.2** Are you sure that the customer has heard and understood all the relevant details?
    - 3.3.1.3** Does the customer ask you to clarify any details or advise they do not understand terminology being used

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- 3.3.2** Does the client stay on topic and hold a sensible conversation, or do they appear distracted or confused?
- 3.3.2.1** Do the customer's responses remain relevant and are their questions typical for the discussion being had?
- 3.3.2.2** Does the customer answer questions before you have finished asking them, or appear to reply to questions that they do not understand?
- 3.3.2.3** Does the customer take an unusually long amount of time to answer a question that suggests they are struggling to process the information provided to them?
- 3.3.3** Does the customer indicate they may have a disability or impairment typically identified by:
- 3.3.3.1** Voice
- 3.3.3.2** Pronunciation
- 3.3.3.3** Breathing
- 3.3.3.4** Hearing
- 3.3.3.5** Understanding
- 3.3.4** Is the customer coherent and fluent in the language being used?

## Responding

- 4.1** When dealing with vulnerable customers, Connect Insurance train staff to tailor the communication appropriately to ensure the needs of the customer are met, and that they are not exposed to detriment; this is usually achieved by ensuring staff remain aware of the following guidelines:
- 4.1.1** Remain patient and empathetic; do not rush the customer, interrupt, or appear impatient. Allow the customer to arrive at their own decisions and process the information sufficiently.
- 4.1.2** Ensure the customer can hear and understand what you are saying, ask the customer to explain their understanding of what you are telling them, or include questions as frequently as possible to ensure they are paying attention and are aware of what is being discussed.

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- 4.1.3** Allow the customer to explain thoroughly; do not assume you already know what their requirements or needs are, and do not finish off their sentences which often implies you are rushing them to progress the conversation. Listen carefully to the customer and remain conscious of any absence of understanding, hints at unawareness, or forgetfulness of topics already discussed.
  - 4.1.4** Clarify that the customer is comfortable with the standard and method of communication and offer to provide details in an alternate format such as via post or email for clarity. Before acting on a vulnerable customer's advice, ask if there is anybody else, they need to speak to about their decision.
  - 4.2** Once a vulnerable customer is identified, or we ascertain that a customer we are dealing with should be considered vulnerable, relevant notes are added to the customer record to ensure awareness extends to all staff within the company who deal with the customer. It is important that we maintain a consistent level of service, and that a vulnerable customer receives adequate care irrespective of which staff they liaise with.
  - 4.3** If a vulnerable customer raises a complaint or has a grievance with how they have been treated or spoken too, we will investigate our conduct by assessing the standard of communication used in emails, letters, and phone calls, so far as is possible. This investigation will allow management to identify any required additional training or a necessary procedural change to prevent a reoccurrence.
  - 4.4** If a vulnerable customer is unable to decide for themselves regarding their insurance, as per the Mental Health Act of 2005, our staff will attempt to identify a third party who is authorised to act on their behalf with respect to financial affairs. Quite often a parent or spouse will represent the interests of the vulnerable customer; it is our duty to the customer to ensure the decisions made are appropriate for them.
  - 4.5** If a customer becomes aggressive or distressed due to their incapacities, our staff should make management aware to ensure that the customer is treated fairly. If a client threatens to self-harm, or advises they have already committed any self-harm, the call should be immediately escalated to management who will inform the Police. We will assist the Police with any further enquiries and support the staff member who may be distressed.
  - 4.6** Connect Insurance consider all our customers as equally important, and those who are suffering with a vulnerability must be treated with the care and respect they deserve. All employees who deal directly with clients, regardless of department or position must ensure they understand this policy completely.