

# Vulnerable Consumer Policy

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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. 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.

**Connect Insurance make it an utmost priority to ensure all our staff are capable of identifying vulnerable consumers, and that they are able to handle the situation with the required levels of care, attention and respect.**

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; 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. Other typically encountered scenarios include consumers who are illiterate, those suffering from anxiety or dementia, and others with disabilities that affect sight, hearing or speech.

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 are able to fully understand our communications to maintain fairness and equality of service to all of our clients.

# Identifying Vulnerable Consumers

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. At Connect Insurance, our staff have sufficient skills that allow them to adapt their approach to ensure the consumer they are dealing with is able to 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:

- a person is unable to make a decision for himself if he is unable to understand the information relevant to the decision
- a person is unable to make a decision for himself if he is unable to retain that information
- a person is unable to make a decision for himself if he is unable to use or weigh that information as part of the process of making the decision
- a person is unable to make a decision for himself if he is unable to communicate his decision (*whether by talking, using sign language or any other means*)

In order 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:

- Can the client hear everything you are saying okay and do they understand what you are saying? Do they ask you to slow down or to speak louder? Are you sure they have heard and understood all the relevant details? Do they ask you to clarify any details or advise they do not understand terminology being used
- Does the client stay on topic and hold a sensible conversation, or do they appear distracted or confused? Do the client's responses remain relevant and are their questions typical for the discussion being had?
- Does the client answer questions before you have finished asking them, or appear to reply to a question they do not understand? Alternatively, does the client take an unusually long amount of time to answer a question that suggests they are struggling to process the information provided to them?
- Does the client indicate they may have a disability or impairment based on their voice, pronunciation, breathing, hearing or ability to understand the conversation? Are they coherent and fluent in the language being used?

## Dealing with Vulnerable Consumers

When dealing with vulnerable consumers, Connect Insurance train staff to tailor the communication appropriately to ensure the needs of the client are met, and that they are not exposed to detriment; this is usually achieved by ensuring staff remain aware of the following guidelines:

- Remain patient and empathetic; do not rush the client, interrupt or appear impatient. Allow the consumer to arrive at their own decisions and process the information sufficiently.
- Ensure the client is able to hear and understand what you are saying; ask the client 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.
- Allow the client 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 client and remain conscious of any absence of understanding, hints at unawareness, or forgetfulness of topics already discussed.
- Clarify that the consumer 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 consumer's advice, ask if there is anybody else they need to speak to about their decision.

Once Connect Insurance identify a vulnerable consumer, or reasonably believe that a consumer they are dealing with should be considered vulnerable, relevant notes are added to their record in line with the **1998 Data Protection Act** to ensure awareness extends to all staff within the company who deal with the client. It is important that we maintain a consistent level of service, and that a vulnerable consumer receives adequate care irrespective of which staff they liaise with.

In the event that a vulnerable consumer raises a complaint or has a grievance with how they have been treated or spoken too, Connect Insurance will conduct an investigation into employee 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.

In the event that a vulnerable consumer is unable to make a decision for themselves regarding their insurance, as per the **Mental Health Act of 2005**, our staff will attempt to identify a carer or kin 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 consumer; it is Connect Insurance's duty to the client to ensure the decisions made are appropriate for the consumer.

In the event that a client becomes notably aggressive or distressed due to their incapacities, our staff should make their management aware to ensure that the consumer is treated empathetically and 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. Connect Insurance will assist the Police with any further enquiries and support the staff member who may be distressed as a result of the call.

**Connect Insurance consider all of our clients as equally important, and those who are suffering with a vulnerability must be treated with the care and respect they deserve.**

**All staff members who deal directly with clients, regardless of department or position, must familiarise themselves with this policy and ensure they understand it completely.**