

## Top tips: Serving your vulnerable customers better

As COVID-19 shuts down much of the world, the Government has appealed to the UK population to practice strict social distancing, with the most vulnerable being asked to “shield” in self-isolation for a minimum of 12 weeks. A person previously identified as a vulnerable customer might now be at greater risk, with heightened feelings of anxiety. It is also crucial for organisations to consider that, during such times of crisis, any one of their customers may be in a vulnerable state right now.

### How do I identify a vulnerable customer?

Vulnerable customers can go unnoticed by organisations - if you're not looking for the signs, you might easily miss them. It is important to assume that, potentially, all customers are vulnerable – there is no such thing as the ‘ideal’ customer. The below CARE framework, for example, will help you identify if a customer is vulnerable.

#### Comprehend

- Can the customer read/see/hear properly?
- Are they able to follow and understand the conversation/information you are providing?
- Can they make clear judgements based on what you're communicating to them?

#### Assess

- Does the customer appear to be distracted while you're talking to them?
- Is this the best communication method for them?
- Can they access the internet?



#### Retain

- Is the customer able to retain information?
- Are they asking you to repeat things several times?

#### Evaluate

- Can the customer tell you in their own words what you've said to them?
- How well do they express themselves?
- Are they able to convey their decisions/arguments in a clear manner?
- Are they actively taking part in the conversation?
- Are they currently in self-isolation?

In addition, consider what good practice looks like for your industry/sector - for example gas and energy suppliers have, according to reports, “agreed an emergency package of measures to ensure vulnerable people do not get cut off amid a virus outbreak.”

## Our 8 top tips: Steps you can take right now to serve your vulnerable customers

### 1. Identify your vulnerable customers

You should be able to identify who your vulnerable customers are – internally and externally. Refer to the CARE framework above.

### 2. Comply with the law

Certain industries such as energy and telecommunications have to respect certain rules around vulnerable customers. In fact, the Office of Gas and Electricity Markets' (Ofgem) Consumer Vulnerability Strategy focuses on five themes: data, affordability, customer service, innovation and partnership working to drive improved outcomes for consumers in vulnerable circumstances. Make sure you are aware of and compliant with industry regulations where applicable.

### 3. Have a customer-centric approach

Your customers need to be at the heart of your organisation – and ideally at the forefront of every decision. This will help you create and maintain the right culture and have the right processes in place to empower your customers. When empowered, your customers are more able to take control of the situation and can help you to serve them better.

### 4. Ensure your products/services are flexible

Whether during a crisis period or not, your customers' circumstances may change. Although it is important to protect your commercial interests, by standardising your products and services to suit the 'ideal customer' can have a detrimental impact. Your products and services need to be flexible enough to accommodate changes to your customers' circumstances, and your staff should be empowered to provide tailored solutions for your customers.

### 5. Assess best practice

What are your competitors doing? Do they have offerings more suited to vulnerable customers? How are they communicating with this segment of the market? Scan the industry to find out if there is any additional support you could be providing to your vulnerable customers.

### 6. Support your staff

Very often, the breakdown happens when staff do not fully understand the policy and strategy in place for vulnerable customers. Policy needs to empower employees to use discretion rather than being tied down to rigid rules such as time-limits on conversations with customers or following inflexible scripts.

Create and implement a vulnerable customer policy that will support the right culture and training to empower your staff in delivering service to customers. If there are any policy updates, make sure these are communicated clearly throughout the organisation so as to avoid mistakes that may exclude your vulnerable customers.



In some situations, your frontline staff should be able to use a 'common sense' approach and have the flexibility to do so. Staff should also feel that they are fully supported and have the confidence to ask a colleague to help them with a customer, especially during challenging interactions. If there is a dedicated specialist team in place, it is important for staff to have all the information to hand so they can pass the customer on to the right person.

If you are recording the conversation, ensure you explicitly disclose this to the customer so they are aware that you will be recording them, and they fully understand the reasons why and how their data will be used. If vulnerability is disclosed, the General Data Protection Regulation (GDPR), tailored by the Data Protection Act 2018 (DPA 2018) requires that any information stored must be recorded with the full knowledge and consent of the customer, and must be kept accurate and up to date. If you suspect vulnerability, e.g. mental health issues, but this has not been disclosed, it would be acceptable to record that the person kept saying 'they didn't understand' rather than 'I think they have a mental health issue'. Please refer to your own organisation's Data Protection policy if information on a customer is being recorded.

### **7. Fit-for-purpose systems and processes**

Failure of internal systems, where organisations fail to communicate and connect information internally, can lead to customers having to repeat details of their circumstances, resulting in duplicate data held

in different areas of the organisation. This can lead to disconnected communications, heightening a customer's anxiety and stress. Another potential issue here is the increase in automation. Some vulnerable customers might encounter challenges to get through to your people. Ensure that your staff are equipped with the right tools and processes to be able to capture key, accurate information and respond efficiently and effectively to all your customers.

### **8. Conduct ongoing reviews**

Once you have your vulnerable customer policy in place and fully implemented by your employees, you need to review and evaluate the relevance and purpose regularly. This is especially true right now, during these unprecedented times, as situations and personal circumstances can change rapidly, and you will need take these into consideration on an ongoing basis.

Remember that the whole organisation needs to fully understand the vulnerable customer policy (or policy updates), so they know how to best serve your vulnerable customers – especially in these current, challenging times. They need to adopt an 'assume, check and adjust' approach with each customer to whom they speak. You need to support and empower them so that they can utilise key skills such as emotional intelligence, to show empathy and compassion, employ active listening and questioning skills to understand customers' queries and concerns fully, and adapt the service delivery accordingly.

*We hope these top tip are useful and we'd love to hear your feedback. Should you have any questions you would like to ask us on this topic, or for more information about our Vulnerable Customer Masterclasses please get in touch at: [enquiries@icsmail.co.uk](mailto:enquiries@icsmail.co.uk)*