

1. Statement

The Oldham Motor Company Limited are committed and dedicated to ensuring we treat vulnerable customers fairly, with sensitivity and in an empathetic manner. We will abide by all guidelines set by all regulatory bodies.

We are fully committed to ensuring our products and services meet all the needs of our vulnerable customers and this document is to ensure all our staff members are aware of these policies and understand the procedures they must follow.

The Oldham Motor Company Limited have implemented several processes within this document to clarify procedures and help staff in identifying, assessing, and dealing with Vulnerable customers.

2. Purpose

The purpose of the policy and process document is to ensure our staff have the ability, knowledge, and training to support vulnerable customers in a transparent and clear manner. This document will define the steps our staff need to take when dealing with a vulnerable customer alongside extensive training sessions on what a vulnerable customer is, drivers of vulnerability, the impact, and how we can meet their needs to ensure a positive outcome for the customer.

3. Scope

This document is for all staff members within the company and has been created to ensure everyone is fully aware of the legal, regulatory, contractual, and business expectations and requirements when dealing with vulnerable customers.

4. Definition

“We define vulnerable customers 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”. – **As defined by the FCA**

A vulnerable customer may be unable to represent their best interests. – This could be due to several factors, language barriers, hearing difficulties, mental health problems, stress related illnesses, care givers, life events, circumstantial events, learning difficulties. These customers may not be able to fully understand and make an informed decision on the products and services we have on offer.

Some vulnerable customers may be putting themselves at risk through choosing the service or product on offer. This could be due to over commitment financially which can cause undue distress or that due to their physical vulnerability the service / product cannot meet their needs.

5. Objectives

The Oldham Motor Company Limited strive to provide the best service / product to all our customers and to ensure we meet all their demands and needs in particular when dealing with vulnerable customers, ensuring they are treated fairly, and all their demands and needs are met.

The Oldham Motor Company Limited

- a) To be able to implement the correct policies and procedures by ensuring we have the correct systems, controls, and measures to identify and handle the situations.
- b) Complete in-depth training for all members of staff, with detailed information and provide ongoing training on how to identify, understand and support a vulnerable customer.
- c) Support for our staff on how to approach and support, when dealing with difficult situations.
- d) Ensure we have robust policies, procedures, and system in place to ensure we keep the impact of vulnerability and how our systems, policies and procedures could affect this.
- e) Complete regular checks to confirm we are meeting all regulations and guidelines.
- f) Where required allow for third parties to be contacted to improve the outcomes for vulnerable customers.
- g) Allow our frontline staff flexibility on policies and procedures to ensure a customer is being treated fairly when vulnerable.
- h) Use of support aids and scripts where appropriate.
- i) Monitoring and ongoing assessments for quality to ensure our staff understand and implement all support needed for vulnerable customers.
- j) Use of vulnerable aids such as, large print materials, Multiple contact options (text, email, phone, and post) all requests can be sent via these channels.
- k) Designation of authority for instance – carer, parent, spouse etc.
- l) Regular checks to ensure our communication is user-friendly, easy to understand and jargon free.
- m) Regular checks on all our systems and automated processes for compliance.
- n) Allow all staff members flexibility and time to deal with vulnerable customers across the board.
- o) Ensure all members of staff comply with data protection.
- p) Ensure that all staff members are consistently using the approach set out in this document.

5.1 Debt and Mental Capacity

Mental health is one of the most likely conditions that our customers exhibit as being a vulnerable customer. The Oldham Motor Company Limited have provided their staff with the training and support to be able to identify and support a customer who has declared they have mental health issues.

Here is a list of questions that could help to identify mental health cases:

- Does this person have a mental health issue?
- Does the mental health issue have a name or a diagnosis for example (depression, severe anxiety etc)
- Does the mental health problem affect their ability to manage their money?
- If the customers are receiving treatment or support for this mental health problem, does this treatment or support affect their ability to manage their money?
- When we are communicating with the customer, are there any special circumstances that we need to consider?
- Are there any relevant impacts/effects that this person may experience in their day-to-day life due to their mental health problems?
- Does this person need a 3rd Party person to help deal with their finances (partner, carer, relative, health care professional)?
- Can the information provided be shared with the person it is about?
- Has this person completed a DMHEF previously? (Debt and Mental Health Evidence Form)

The Oldham Motor Company Limited aim is to ensure that where we deem a customer to have a mental health condition that we take all the appropriate steps to ensure that:

- a) The customer has the ability to manage their money or debit.
- b) That they are not unfairly penalised or excluded from the product or services on offer.

When a customer has been identified as vulnerable, we will actively encourage them to disclose any information that could help us to assess and support them in ensuring they receive the best outcome.

Any information we received will be dealt with in the strictest confidence and will be stored securely and will only be retained for as long as necessary as per the DPA regulations.

When dealing with customers who could potentially have a mental health issue we will endeavour to ensure:

- We do not place them into further financial stress or place a burden on them?
- We ask questions and if required we escalate to a senior manager.
- We ensure we treat them with dignity, respect, and empathy.
- We confirm they UNDERSTAND what they are entering into.
- Where necessary we complete follow up calls.

- We treat each customer on a case-by-case basis according to their individual needs.

6. Procedures

6.1 Introduction

Whilst we understand that the term 'Vulnerable Customer' covers a breadth of types, situations, and circumstances, we have created these procedures as a tool/guide to ensure all members of staff understand the steps that they need to take to handle any situations that may arise. Whilst this document is not exhaustive, some of the procedures are generic and have been developed to meet the regulatory standards as well as taking into consideration the needs of those with additional vulnerabilities.

A customer who has been identified and / or declared as being vulnerable to a member of staff, please ensure the following steps/processes are followed in every instance:-

1. Can you identify, understand and deal with the vulnerabilities of this customer?
2. Does the vulnerability hinder their mental capabilities?
3. If the vulnerability is physical, how can we support them.
4. If the sales information given was via email/telephone this must be followed up by written confirmation disclosing all relevant details and the full terms and conditions that apply.
5. Can the customer follow the processes in place, or do they need further support?
6. Does the customer understand the need for the process to be followed and the subsequent consequences if it is not?
7. All information must be logged on the system in a sensitive manner.
8. Is there a need to contact specialist services, is the customer in any danger?

Communications

Ensure that the customer has a choice of communication:

- Email
- Post
- Telephone
- Text
- Face to Face

Ensure that all our written material, is clear to understand and jargon free. If the customer has trouble reading the communication, do they need us to read and explain it in full, due to their condition.

Ensure that our products / services are flexible to suit our customers' needs and requirements.

Allow for flexibility to ensure the best outcome with regards to certain situations and circumstances.

Allow time for vulnerable customers to be able to process the information given.

If a 3rd Party is required, confirm they have authority and be open and transparent.

Where the customer requires follow up contact ensure we diarise and complete.

Any information that has been disclosed especially sensitive and/ or confidential must be stored safe and secure and will only be retained as long as necessary in accordance with The Data Protection Act 1998.

We must flag the account on the system as vulnerable to ensure all other staff members are aware of how to handle this customer in the future.

6.2 Mental Health Issues

Although a customer has been flagged as having a mental health issue this does not mean that they are not entitled to our products / services, we do not discriminate against anyone. We do however need to take extra precautions to ensure we are being fair, consistent and have an ethical approach.

What to do when dealing with a potential mental health case:-

Accounts that could incur charges/interest due to non-payment are placed on hold and the charges / interest are stopped during any communication period.

We do not add to their mental and or financial stress.

Customers will be treated on a case-by-case basis according to their mental health issues taking into consideration their condition and ensuring they are able to make informed decisions that do not cause any detriment to themselves.

All information discussed via email/telephone is followed up in writing including any additional information ensuring full disclosure of the terms & conditions of the product / service.

All information provided is clear, transparent, and jargon-free, ensuring that the customer can make an informed decision based on the terms and conditions, if their needs are being met and they are able to complete the requirements of the product/service.

Where appropriate we will work with any authorised 3rd party to provide the customer the best service/product to suit their needs and circumstances.

If the customer requests a person to speak on their behalf, we must put on the system the appropriate person's name as the person having delegated authority to speak on the customers behalf.

ALWAYS, ensuring before the customer enters into any contractual agreement with us that they fully understand:

- a) What they are entering into
- b) How it works
- c) What their obligations are to fulfil their part of the contract
- d) Are their demands and needs being met?
- e) Can they afford it?
- f) Do they fully understand and agree to all the terms & conditions of the product/service?

6.3 Elderly & General Vulnerabilities (Inc Bereavement)

Being elderly or having circumstantial vulnerabilities does not stop our customers from still needing our products / services. When dealing with customers within this vulnerability group we must allow time for them to process the information, be empathetic to their situation allowing them to feel secure to ask questions.

What to do when dealing with this group of vulnerable customers

Is a 3rd party needed to liaise with the customer to ensure all the correct information is relayed and understood?

Provide all information required in writing prior to entering into any contractual agreement. During phone calls, ensure all information has been understood, reiterated where necessary, give the customer time to process.

Will the customer be able to maintain the obligations of our product / service?

If the customer requires any processes explaining more in-depth, ensure you take time for them to understand and if required send the information in different formats: text, email or letter whatever is the easiest for the customer to receive and understand.

Does the customer require further assistance in being able to follow some of our processes and procedures?

If further support is needed ensure this is carried out and reported on the appropriate system.

Follow up on any support that has been provided to ensure the customer was happy with it.

Confirm the customers vulnerability needs will be met by our product/services on going.

ALWAYS, ensuring before the customer enters into any contractual agreement with us that they fully understand:

- g) What they are entering into
- h) How it works
- i) What their obligations are to fulfil their part of the contract
- j) Are their demands and needs being met?
- k) Can they afford it?
- l) Do they fully understand and agree to all the terms & conditions of the product / service?

6.4 Deaf/Hard of hearing and / or language barriers

We must always ensure we are dealing with this category of vulnerability with the correct support as they can be at a distinct disadvantage if not handled correctly.

How to handle this category of vulnerable customers

Where necessary we agree to speak with an authorised 3rd Party to ensure all information has been correctly received and understood.

Provide all relevant information on the product / service in a written format prior to entering into any contractual agreement.

Allow time if the customer is using a telecommunications device such as minicom, as all the communication is typed, also ensure you answer in a clear and concise manner and do not use any jargon.

Where possible arrange for materials to be in alternative languages.

Allow time for the customer to receive and understand the product / service, via a 3rd party or from the reading material.

Ensure they have the correct support when carrying out the procedures necessary to the product / service.

Ensure we log all information for future reference.

6.5 Young/Inexperienced

Whilst being young or inexperienced is not classed as a vulnerability as such it does put some customers at a disadvantage therefore, we treat as such.

How to handle a young or inexperienced customer

Ensure we follow up all sales with written confirmation including all relevant information such as the full terms and conditions of the policy, and what the customers obligations are.

Take time to ensure they fully understand what it is they are entering into, does it meet their demands and needs, do they understand the term and conditions and are they aware of the obligations they must adhere to.

Do they need support when following our procedures and processes?

Would they like to authorise another person to speak on their behalf to help them understanding the product / service on offer.

Allow time for them to digest the information given to be able to come to an informed choice.

7. Audits and monitoring

The Oldham Motor Company Limited will carry out regular checks to ensure all staff members are following our company ethos of ensuring vulnerable customers are treated fairly.

All staff members will be monitored on a regular basis by their individual line/departmental managers. This monitoring is designed to help us to see if there are any gaps in our policies and procedures and how to resolve these issues.

All monitored calls will be scored and shared with the relevant staff member to allow for feedback. These will be logged and kept on the system as evidence for a yearly audit.

The Oldham Motor Company Limited will work with its partners to produce relevant MI reports to allow us to track any issues that may arise in a timely fashion and allow us to act on any information that shows where we may have a problem.

8. Training & staff support

All our staff will undergo full training in treating vulnerable customers fairly at the start of their employment and yearly thereafter. The training will incorporate how to identify a vulnerable customer, what drives vulnerability, the impact of poor decision making on vulnerable customers and are vulnerable customers' needs being met and finally on how to protect vulnerable customers. They will also be supplied with additional reading material for them to keep that incorporates all their training to allow them to use as a tool when or if a situation arises.

The Oldham Motor Company Limited are committed to ensuring all our staff are fully trained and supported on how to deal with vulnerable customers. We also hold an open-door policy with our staff if they think we could do more to support vulnerable customers we encourage them to share their ideas and where necessary will put into implementation.

9. Responsibilities

We will commit time, resources, and support to allow our staff to understand and implement the Vulnerable Customers procedures and policies into their daily working life.

Senior Management are responsible for the overall compliance approach to ensure all staff are included in the training and fully supportive to all members of staff.

Senior Management / Directors will be responsible for the audits and ensuring there are no gaps in our policies and procedures. There will be a continuous audit trail of all Vulnerable Customers Audits and feedback to ensure continuity through each process and task.