

Open Fibre

Vulnerable Customers

Policy

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1. Policy Statement

Open Fibre is committed to identifying, assessing and managing vulnerable customers in accordance with our own defined objectives and policy, as well as any regulations and guidelines set out by our regulators. We aim to treat all customers, who we define as being vulnerable, in a fair, clear and respectful manner.

We have implemented several identification and assessment tools within the procedure section of this document, aimed at identifying, assessing and dealing with all Vulnerable Customer situations and to consistently ensure that our staff are aware of, and knowledgeable about Vulnerable Customers, including how to handle all situations.

2. Contacting us

The purpose of this policy is to identify and support vulnerable customers and to promote transparency and openness in all the business practices and processes that the Company and our staff create and engage in. It also defines the steps to be taken by all staff when dealing with a Vulnerable Customer or associated situation.

The Company and its staff are committed to ensuring that all customers are treated in a fair and consistent manner, but also understand that some circumstances require additional interactions and/or steps to ensure that the customer is getting a product/service that is suitable and ethical.

Our staff are provided with in-depth training on what makes a customer vulnerable and how to identify, assess and deal with any vulnerability. We are committed to ensuring that any customer who has a relationship with our company, is treated in a fair, reasonable and supportive manner.

3. Scope

This policy relates to all staff within the organisation and has been created to ensure that staff deal with the area that this policy relates to in accordance with legal, regulatory, contractual and business expectations and requirements.

3.1 Definition

The 2 main definitions of a vulnerable customers as used by the Company are:

a. Customers who are unable, for whatever reason, to make an informed decision at the time of dealing with them – customers falling into this category include those with language barriers, hearing difficulties, those with mental health issues, suffering from

bereavement, learning difficulties or the elderly. These customers may struggle to decide on whether the service or product we are providing is in their best interests.

b. Customers whose welfare (financial, mental or physical) could be put at risk through choosing the service or product we offer – these customers include anyone who is going to be put at detriment from taking up our services.

4.Objectives

The Company are committed to providing the highest level of due diligence and ethical treatment with regards to any customer or potential customer who is identified as being vulnerable or being at risk from a vulnerable situation. To this end, we have developed the below objectives which are used to create our internal procedures for dealing with vulnerable customers.

Open Fibre aims to: -

- Ensure that we have the suitable, relevant and compliant tools, controls and measures in place to identify, handle and monitor vulnerable customers
- Train staff in the identification, communication and understanding of what vulnerabilities are and how to approach them. Training will be conducted by internal trainer and mandatory for all staff with the Competency Matrix reflecting completion.
- Ensure vulnerable customer procedures in place in line with regulations and guidelines.
- Ensure vulnerable customer accounts are kept up to date and the customers vulnerability is accurately recorded.
- Research and take expert advice on specific vulnerabilities such as Mental Health and Debt so that our staff and procedures are adequately aligned with the standards
- Use support aids and scripts for front line staff and share training PowerPoint.
- Use vulnerable customer aids in place to help customers with specific situations, including but not limited to: -
 - Braille letters
 - Large print materials
 - Multiple contact options (*email, phone, post, online,*)
 - Authorised person to speak on behalf of the account holder.
- Ensure that all materials, content and information is user-friendly, easy to understand and jargon free

5. Responsibilities

Open Fibre ensure that staff are provided with the resources and support to learn, understand and implement the Vulnerable Customers procedures and associated policy into their departmental practices.

6. Debt and mental capacity

Mental health is one of the most common issues that can result in a customer being vulnerable. The Company provides staff training and support to identify and deal with customers who have declared or meet the criteria for having mental health problems.

This policy follows the guidance set out by the Royal College of Psychiatrists and Money Advice Liaisons Group (MALG) on debt and mental health. It is the firm's policy to use the standard 7 basic questions contained on the Debt and Mental Health Evidence Form (DMHEF) in identifying mental health cases, as below: -

1. Does the person have a mental health problem?
2. Does the person have a mental health problem that currently affects their ability to deal with money?
 - a. Does this mental health problem have a name?
 - b. How does this mental health problem affect the person's ability to deal with money?
3. What was the approximate date of: -?
 - a. The first onset of this mental health problem
 - b. The first treatment given for this
 - c. The most recent episode of this mental health problem
 - d. Is this episode currently ongoing?
4. If the person is receiving treatment or support for this mental health problem, is there any aspect of this that affects their ability to manage money?
5. Are there any other relevant impacts or effects that the person may experience in their everyday life due to their mental health problem?
 - a. What other relevant effects are there?
6. Does the person have any difficulties with communication due to their mental health problem?
7. Can the information provided in this form be shared with the person it is about?

The Company follows the Codes of Practice relating to the collection of medical evidence about mental health conditions and always aims to: -

- Take steps to establish whether the mental health problem affects the customers' ability to manage money or their debt.
- Ensure we give customers more time when negotiating payment options.

- Work with the customer in a patient, clear and helpful manner to resolve the debt problems and use workable solutions.
- Provide reasonable periods of time for the customer to provide evidence of any mental health condition and place accounts in dispute during this period.
- Prevent any charges from being added to the account during the consultation period.
- Work with the authorised person to assist in resolving the customers debt issues.

Where the Company has identified that a customer is considered vulnerable, we encourage them to disclose any potential mental capacity limitation and actively look out for indicators of a potential mental health capacity limitation.

Any information collected regarding a mental health problem is kept secure and is only retained for as long as necessary under the DPA regulations.

When dealing with any potential mental capacity, we always ensure that: -

- Accounts are placed in dispute and charges are put on hold during any communications
- No further mental and or financial stress or burden is placed upon the customer
- All collections staff with a responsibility for using medical evidence need to know how to read, interpret and make decisions on the basis of medical evidence
- We use and follow the MALG 12 steps for dealing with vulnerable customers.
- Customers are treated on a case by case basis according to their mental health issues, and all effects are taken into consideration when processing an account.

7.Procedures

7.1 Introduction

The Company understand that the term '*Vulnerable Customer*' applies to numerous and varied situations and circumstances, therefore we have outlined the procedures in this document for each Vulnerable Customer type as identified in our Vulnerable Customer Policy.

This procedure contains specific vulnerable circumstances and the steps that we take to manage each situation. We also have generic procedures as detailed below which are applicable to every Vulnerable Customer situation. The procedure has been developed to meet the regulatory standards, as well as taking into consideration the needs of those with additional vulnerabilities.

Where a customer has been identified and/or declared as being vulnerable, The Company always ensures that the below steps/processes are followed in every instance: -

- Ensure staff are provided with the training and tools to identify, understand and deal with vulnerabilities and vulnerable customers
- Email/telephone sales information and/or advice is followed up in writing containing the discussed content and any relevant terms & conditions and disclosure information
- Customers with outstanding debt will have their account placed in 'dispute' to ensure the customers' situation is handled correctly.

Ensure that ways to contact Home Telecom are clearly visible on all communications channels, and provide a choice of ways to communicate with us, including: -

- Text
- Post
- Email
- Telephone
- Online Chat
- Ensure that all written materials are clear, to the point and jargon free
- Ensure that where applicable, the services that we offer are flexible and made to suit the customers' needs and requirements
- Offer flexible outcomes on services as dictated by the customers' situation and circumstances
- Ensure that any sensitive and confidential information disclosed to Open Fibre regarding the customers' vulnerability is safe and secure in accordance with The Data Protection Act 2018 and the General Data Protection Regulations (GDPR)
- Ability to flag accounts where a vulnerable customer has been identified to ensure staff are aware how to handle the account in future.

8. Financial Difficulties

8.1.1 Financial Difficulties

It is the Company's aim to prevent an account from entering into arrears in the first instance. Where previous arrears have occurred or the customer has already notified us of

a financial difficulty situation, the account will be flagged and monitored, and close communication kept with the customer for a specified period.

We offer options to help with any financial difficulties such as asking the customer to pay a reduced monthly payment to avoid disruption of services. The customer would also be offered the option to set up a monthly payment plan with a value that is comfortable for the customer to meet every month. The aim is to prevent an arrears situation from developing.

8.1.2 Notification

The customer record in the CRM are flagged highlighting to other departments to read notes to understand how to treat the customer.

8.1.3 Assessment

The Customer is assessed by the relevant team lead of the business area. The CRM systems will be updated to reflect the customer status.

8.1.4 Ongoing monitoring

Team leaders will be responsible for monitoring and engaging with the customer.

8.2 Mental Health Issues

Despite a customer being identified as having mental health issues (*including stress, depression, anxiety or other diagnosed conditions*), Open Fibre understand that services are still required.

We do not exclude a customer from purchasing our services on the basis that they have been identified as vulnerable. We do, however, follow the procedure below to ensure a fair, consistent and ethical approach.

Any information collected regarding a mental health problem is kept secure in our system at all times and is only retained for as long as necessary under the DPA regulations.

When dealing with any potential mental capacity case, we always ensure that: -

- Accounts that could incur charges due to being defaulted are placed in DISPUTE and charges are stopped during any communication
- No further mental and or financial stress or burden is placed upon the customer
- We may offer a payment plan option to recover the debt. We always use and follow the MALG 12 steps for dealing with vulnerable customers

- Customers are treated on a case by case basis according to their mental health issues and all effects are taken into consideration when processing an account
- All information discussed via telephone or email with a vulnerable customer are followed up in writing afterwards and full disclosure is provided in the content
- Customers are provided with clear, transparent and jargon-free information so that they can make an informed decision on the services we provide

8.3 Elderly & general vulnerabilities

The Company understands that elderly customers and those with circumstantial vulnerabilities may still need the services that we offer, however, we aim to give more time, consideration and options to this group of vulnerabilities due to their possible inability to process information as quickly as others may.

Where possible and/or applicable, we ensure that: -

- During phone calls, reiterate all important information and the details of any financial implications when taking up a service.
- Clearly explain the benefits **AND** disadvantages of the services and any implications that may be associated with missed payments or breaches in contract
- Clearly explain that the customer has up to 14 days' notice to cancel the contract after the agreement has been signed

8.4 Deaf/Hard of hearing or language barriers

The Company considers those with language barriers or hearing difficulties to be vulnerable as they can be at a disadvantage hearing or understanding the services being offered. Where possible we always ensure that: -

- The customer appoints a family member or close personal friend as a representative to speak on their behalf to ensure that the details of the service are being correctly relayed.
- Provide all discussions and product information in writing prior to the customer receiving any contractual agreement
- Offer braille and/or large print materials if applicable
- Ensure that the customer has had enough time to gain advice from a family member or appointed representative before following up with any calls

