



The vulnerable consumer

Recognising vulnerability and taking a customer-centric approach

DMA vulnerable consumer taskforce

[September 2016](#)



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Contributors

The DMA vulnerable consumer taskforce

The DMA's vulnerable consumer taskforce was set up to help all businesses better understand how to communicate with customers that may be vulnerable. The taskforce has been running for some years and in that time has worked to develop understanding and approaches towards vulnerable customers, as well as creating guidance and training.

The taskforce regularly consults with experts and stakeholders throughout the sector and is co-chaired by:

Jacqui Crawley, Managing Director, KMB

Elaine Lee, Director, ReynoldsBusbyLee

DMA vulnerable consumer community

The taskforce engages with a wide community of industry leaders across business and charity sectors, public and trade organisations, and law-makers to canvass expert views, ideas and to develop best practice advice.

The DMA's vulnerable consumer taskforce held a workshop to discuss how businesses can better deal with potentially vulnerable customers.

This document provides a follow-up, collating the vision and aims of a wide representation of sector stakeholders to outline what a future operating model for the industry could look like. This model and the key features outlined in this whitepaper are designed to be an ideal for the third sector to aspire to. However, they are also intended to be an attainable goal, with tangible actions included for each section to act as a guide for charities on the journey to a more sustainable fundraising future.

This document pulls together the contributions of both these wider industry conversations and the workshop attendees, including:

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Introduction

Vulnerability is highly nuanced and contextual

When discussing the topic of vulnerability, it is first important to understand that it is a very changeable and contextual state. The factors that could make a consumer vulnerable could be any illness, condition, stress or disadvantage. These rarely remain static too, meaning they could get better or worse over time, not to mention that they could affect your customer in some situations but not others. For example, someone might suffer from worsening cataracts that affect their ability to read information online, but not impede their aural comprehension; and then undergo treatment to restore their original eyesight.

Even the circumstances and situations we all encounter in our everyday lives can make us vulnerable at a particular moment, whether from financial stress, relationship difficulties, bereavement, illness or being exhausted after having a baby. Simply being caught at the wrong moment, whilst distracted by something more important or feeling social pressure, can cause any of us to be more vulnerable in that moment and make a decision we wouldn't in another context.

It is crucial that you and your entire team, whether customer-facing or not, understand this and do not hold a simplistic concept of vulnerability as only covering obvious factors such as physical or mental disabilities.

Inclusion, not exclusion, is the key to supporting vulnerable customers

Avoiding creating situations of vulnerability is about inclusion and accessibility, not exclusion and alienation. Identifying a customer as having a vulnerability should rarely equate to an automatic 'do not contact' flag. Indeed, excluding a customer for being vulnerable might be the worst thing you can do, causing isolation or exacerbating the vulnerability. For example, denying someone with learning difficulties the chance to access a normal service purely because they struggle to use a particular channel.

The key is seeing customer relationships from the perspective of building tailored, supportive interactions for each customer, rather than treating the accommodation of vulnerability as a compromise or distraction from your main activity. While vulnerability is often very difficult to predict, it is vital that the entire organisation understands and recognises it correctly in order to handle those interactions better, supporting each customer in the right way, so that both businesses and customers win.

Strategic and tactical approaches to vulnerability

Ultimately, the best way to approach vulnerability is to treat each customer and their needs on a one-to-one basis, then to give them the power to control their own experience wherever possible. This can be as simple as the ability to choose the channels that work best for them and interact at their own pace, on their own terms. By taking this customer-centric approach, the distinction between more and less vulnerable customers begins to fade and the business can focus instead on the goal of building more personal relationships with every customer, for a mutually respectful and beneficial long-term future.

There are already a great many things that businesses can do to move towards this ideal: starting with making sure everyone in your organisation understands that vulnerability is not a simple tick-box exercise and that they have the support processes in place to act appropriately. Simply replacing fear of vulnerability with understanding and respect for customers' specific needs, no matter how uncommon, will enable customer services teams to make better, common sense decisions as part of their day-to-day roles that will increase any organisation's accessibility and quality of service to everyone.

For its part, the industry needs to continue to share its experiences and guidance to help organisations make these judgements, as well as help build customer trust and confidence that their needs are valid, recognised and being served with the right intentions and commitment. This document works towards this goal by collating and expanding upon the ideas of senior industry stakeholders to provide actionable, here-and-now insight, guidance, resources and future direction on both strategic and tactical approaches to vulnerability.

Don't put customers in a vulnerable position

A customer can be vulnerable simply by being placed in a situation that fails to meet their needs, in which they are not fully aware, and therefore are unable to make an informed decision. Meaning that any brand proactively marketing its products and services should be aware of the responsibility, ensuring it is meeting the customer's unique needs, whatever they are, and that the customer has the understanding and ability to make the right decision.

Just how many of your customers are vulnerable entirely depends, therefore, on you. For example, if your service clauses are confusing or your communication channels are unsuitable, you could potentially be creating more vulnerable customers than you already have. Alternatively, brands can take a truly one-to-one approach, acting responsibly to understand and meet each customer's needs, as well as responding and safeguarding appropriately. These brands can offer a better experience to every customer they have, ensuring they are catering to those that may still be vulnerable, while not putting any into a vulnerable position in the process.

Elaine Lee & Jacqui Crawley

Co-Chairs of the DMA vulnerable consumer taskforce

September 2016

Understanding vulnerability

What circumstances make a customer vulnerable?

A major challenge with meeting your customer's needs is keeping up with the almost constant changes in their life. Many factors that influence vulnerability are common lifestages that affect all of us at some point and are ever-changing, unpredictable and entirely depend on context. The better you know and communicate with your customer, the more accurately you will identify, understand, respect and cater to their needs at any given moment.

This graphic is intended to be illustrate the wide range of potential vulnerabilities within your customer database rather than attempting to define where on the spectrum each should sit.

Many factors could make a consumer potentially vulnerable



Every two minutes

1 person is diagnosed with diabetes



Every day

813 people are diagnosed with cancer

1,121 people are made redundant



Every hour

1 person is diagnosed with parkinson's



Every year

Over 400 people are diagnosed with multiple sclerosis

Estimated 100,000 people declare bankruptcy or insolvency



Today



4 million living with diabetes



850,000 living with dementia



500,000 living with epilepsy



300,000 living with cancer



1 in 4 living with a mental health condition



1 in 10 living with dyslexia



1 in 40 living with depression

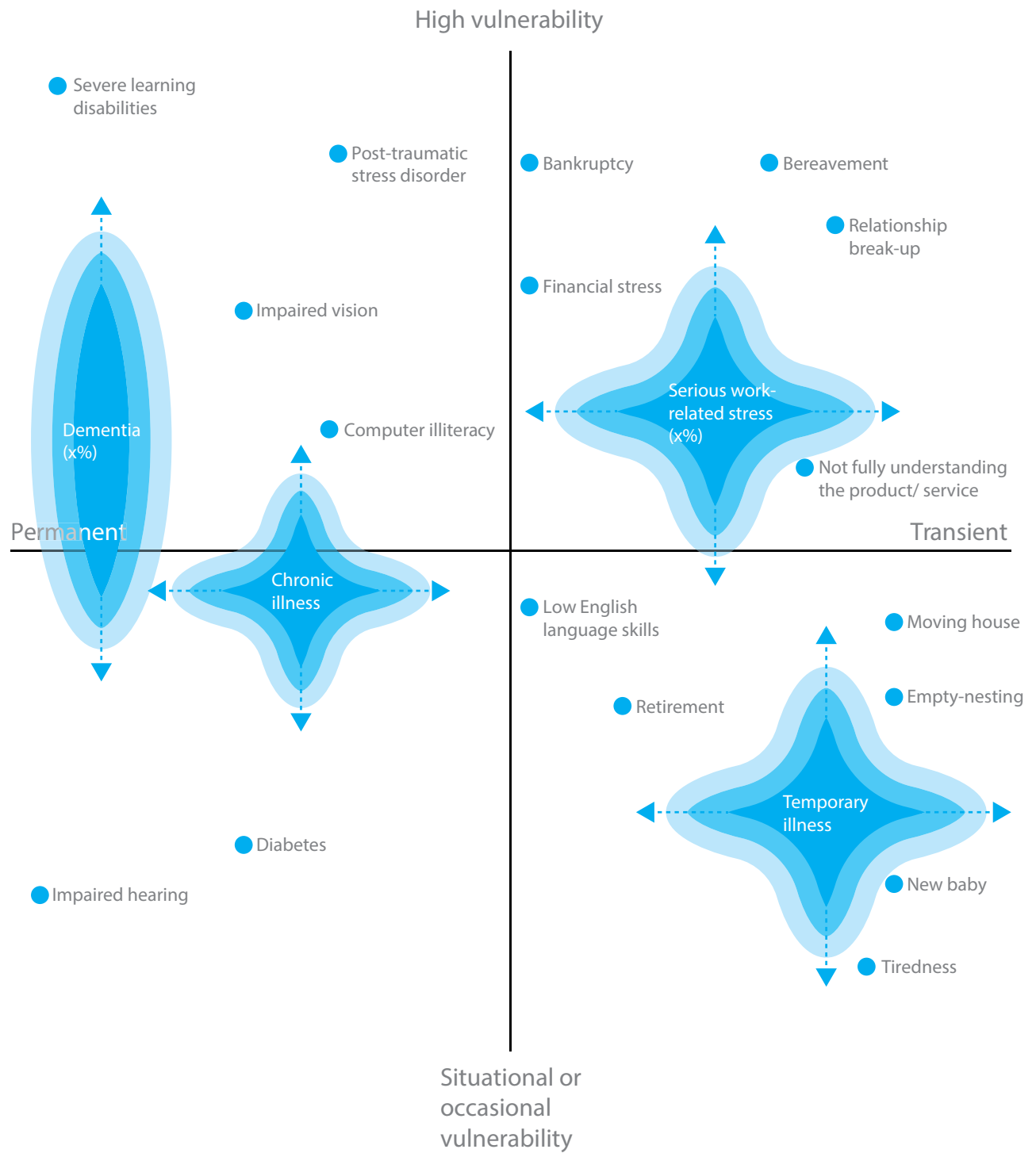


1 in 500 living with parkinson's



1 in 600 living with multiple sclerosis

Vulnerabilities can be everyday and rarely remain static



Evolving to cater for vulnerability

Alongside a strong consensus about the opportunities for an industry-wide system of support, there is already a huge amount that your organisation can do, right now, to avoid putting your customers in a vulnerable situation.

Identifying vulnerability

There are certain behavioural indicators of vulnerability that any organisation can identify and react to. These include:

- Self-declaration as vulnerable: for example, a customer saying “I can’t read small text” or “I don’t feel well”
- Signs that the customer doesn’t clearly understand: for example, high dwell time without taking an action, repeatedly pressing the browser back button, asking for information to be repeated or giving the wrong responses
- Destructive habitual behaviours, including addictive and binge behaviours
- Unusual or sudden changes in behaviour
- Abnormally emotive or illogical behaviour
- Repetition of words or phrases, demonstrating that they do not feel as though they are being understood

Training

It is important that the sector maintains a holistic view, through its industry bodies, to ensure that marketers are being trained and recruited with the right skillsets and attitudes to ensure a responsible, successful one-to-one marketing future. It is the DMA’s view that vulnerability workshops should become mandatory for all, as they are for Financial Conduct Authority-registered financial services organisations.

The correct approach to a customer’s needs heavily depends on the particular product, medium and customer: for example, someone with impaired hearing is obviously vulnerable in aural media but has no inherent vulnerability in visual. Individual organisations and marketers need to make sound judgements about their own products and services as a core part of their responsibilities and must ensure they have the understanding and empathy to do so.

Actions

- Make sure you and your organisation fully understand what vulnerability is, how it is represented within your customer base and how that should shape your marketing
- Ensure your front-line staff are fully trained to identify, support and record the needs of each customer
- Appoint a trained vulnerability supervisor to help staff in sensitive situations, or to step in and serve a customer themselves. Training for vulnerability supervisors can be accessed through the DMA
- Recruit staff who understand, believe in and can deliver responsible, sensitive activity for all customers. Having the right mindset and skills throughout your organisation in the first place will bring you immediate benefits

Duty to communicate effectively

Communication quality is a vital factor in exacerbating or eliminating vulnerability. It is our responsibility as marketers to ensure our customers fully understand what we are asking them to do or buy and what the consequences of their decision will be.

Actions

- Design your communications from your customer's point of view and ensure your organisation is geared to fulfilling the outcomes your customers need
- Try to understand and resolve the difficult situations your customers might find themselves in whilst interacting with your organisation. Replicate successful situations
- Use plain, simple language to explain the nature of your product or service
- Provide alternative means of communication to suit different vulnerabilities: such as large print, Braille, foreign language, offline and online, and written, aural and visual formats
- Be clear about any commitments, accumulative costs, additional purchases or future consequences your customer is agreeing to, especially if these are not immediately obvious. Examples might be a fixed contract, a large spend on gaming add-ons over the last six months, any vital components that are not included but will be required, or a consequence that by buying X they will no longer be eligible for Y
- Replay customers' decisions and behaviour back to them: for example, double-checking their purchase choices or pointing out to a gambler how much they are spending
- Make sure your organisation is easy to contact and interact with: for example, providing live agents to speak to as well as automated systems, email as well as postal addresses and specific departments to contact for particular queries
- Create, publish and maintain a customer charter and vulnerability policy – not just as a token or niche effort but as a vital document to ensure clarity and effectiveness throughout all business decisions and activities, leading to healthy customer relationships and real competitive advantage and sustainability. This document should be understood as a highly useful, value-adding document that will give all staff and customers a clear framework for interaction and ensure the best possible customer service

Developing and implementing best practice

Best practice towards interacting with vulnerable customers is part and parcel of best practice for interacting with all customers. Guidance already exists from industry associations, including the DMA.

The DMA Code lays out the five key principles that must steer all one-to-one marketing activity and which, if followed correctly, will naturally lead to appropriate care for all customers whatever their individual needs. The five principles are:

- Put your customer first
- Be honest and fair
- Respect privacy
- Be diligent with data
- Take responsibility

Actions

- Adhere to the DMA Code:
dma.org.uk/the-dma-code
- Use existing DMA guidance to instill best practice throughout your organisation. The DMA offers best practice guidance to cover one-to-one marketing across data, email, contact centres and telemarketing, mobile, social media, door drops and inserts:
dma.org.uk/guides

- The DMA also offers specific guidance for call centres dealing with vulnerable customers: dma.org.uk/article/white-paper-guidelines-for-call-centres-dealing-with-vulnerable-customers
- Train all your staff to understand and mitigate vulnerability during their day-to-day activity
- Nurture responsible marketing from the very top of your organisation down, with a clear ethos promoted by management to front-line staff

Safeguarding

While some customers might knowingly act against their interests, for example when indulging an addictive behaviour, most are likely to be unaware when they are making the wrong decision and only realise when they experience the result, if at all. This creates a duty for you to help your customers understand their own behaviours.

A key challenge will always be to know when to intervene if behaviour indicating vulnerability is detected. While the industry should look to develop informed guidance around this, one-to-one practitioners must be trained, confident and responsible for judging each unique situation for themselves, and be able to act with the support of their management team and company policies, processes and systems.

In developing purchasing safeguards, marketing can learn from the financial services and gambling industries, which have developed more sophisticated behaviour-driven safeguards against fraudulent or addictive behaviour.

Marketing authorities need to be able to define, assess and govern in situations where a customer has not received the support they need; and consequently must be able to provide advice, co-ordinate discussion and curate research and learning to improve industry understanding and practice.

Actions

- Build simple checkpoints into your customer's journey. For example:
 - Replay the customer's behaviour back to them, such as asking "are you sure you want to perform this action?" or telling them how much they have spent accumulatively
 - Include safeguards around the purchasing moment, such as requiring a second purchase confirmation or adding a time delay
 - Watch out for unusual activity: for example, a purchase made in the middle of the night could trigger a time delay or second level of confirmation in case the customer was abnormally tired, stressed, intoxicated, under family pressure or suffering from a mental health issue
 - Offer an explicit cooling-off period, particularly when sending a purchase confirmation
 - Pro-actively follow up after purchase to check the decision was correct
- Consider what customer actions should trigger a safeguarding response. For example:
 - If someone with dementia makes a large or unusual purchase, you might notify their carer or someone with power of attorney, such as via a triggered text or email or a regular statement of transactions
 - It may be possible to notify a credit card issuer if you spot unusual or unsustainable purchasing behaviour
 - Always respect customer privacy and data laws
- Give your customer a cooling-off period, with easy steps to back out of a purchase that was not in their best interests. If appropriate, pro-actively follow up to ensure they are comfortable with their purchase and the service provided

Data and consent

More data is needed to be able to identify and serve vulnerable customers. Information is currently siloed in different industries and formats. Data sources that could contribute to a full understanding and identification of vulnerability include health services, financial services, programmatic advertising, customer databases, charity databases, big data companies and sensitive sectors such as gambling.

Data pooling between companies would enable a truly cohesive approach to identifying and tracking vulnerability: for example, if a customer switches to a different supplier, knowledge of their vulnerabilities should travel with them. Data portability laws under the new EU General Data Protection Regulation might give rise to this from 2018.

Support for a charity is often a result of personal experience with the cause; so support might be an risk indicator for related vulnerabilities. Charity supporter lists could be another useful data set for identifying customer vulnerabilities on behalf of commercial as well as not-for-profit organisations.

Actions

- Have a cohesive customer view throughout your organisation so your team can easily record, share, recall and adapt to any vulnerabilities
- Simply ask your customers to learn about their vulnerabilities. Use indirect as well as direct questioning throughout their customer journey to understand their current ability to make the right decision. Check during every interaction to track the ever-changing needs of each individual
- Data must always be used responsibly and honestly to provide a better, safer service to all. Organisations' bottom lines will benefit more by better serving individual customers than by merely selling to them
- Refresh your customer's consent regularly to ensure it remains relevant. Vulnerabilities can spring up and disappear overnight, so include some sort of temperature check in each significant new interaction. Consider using various types of check rather than repeating the same one: for example, asking your customer if they are happy with recent interactions, would prefer an alternative format or inviting them to sign up to a different communication channel

Systems and tools

Development of a single customer view within an organisation, and an ability to use this through a strong customer relationship management platform and customer service tools, is essential to facilitate a full understanding and personalised level of support for each customer.

Actions

- If you are not already doing so, your organisation should work to develop a single customer view urgently in order to provide any customer with the personalisation, relevance and preferences now expected
- Implement a strong system for identifying, recording and flagging different (especially more common) vulnerabilities. Ensure all interactions are adapted accordingly

Design and usability

Design and usability can both create and mitigate vulnerability, largely by making it more or less difficult for a customer to access, understand and act during the purchasing journey. Every design element can increase or decrease risk of vulnerability: including images, fonts, colour, simplicity and consistency.

Strike the right balance between standardising aspects of one-to-one marketing to improve usability or convenience while still offering enough flexibility for each customer to navigate their journey in the way they find most suitable.

Actions

- Design all interactions from your customer's point of view, considering all likely vulnerabilities and needs
- Provide clear information and user journeys, realistic representations of the product or service and obvious ways for the customer to interact with the sales journey in the way that best suits them, such as an easy-to-see helpline number. Ensure product pricing, contact details and other details are clear and easy to find
- Be consistent with design and usability so customers know where to find information and how to navigate the purchasing journey
- Ensure the true brand is obvious, not obscured
- Present important information, such as key terms and conditions of a service, product or privacy policy, very clearly using readable fonts, legible design and simple navigation
- Invite customer feedback from different customer groups to ensure your design meets their needs

Measuring safeguarding

The one-to-one marketing and fundraising industry will require a common, effective set of indicators to allow itself, and individual organisations, the ability to track and benchmark the care of vulnerable customers.

Analysis of indicators such as conversion rate, attrition rate, customer loyalty and complaints will all contribute to this understanding. A nuanced approach will be required to define what 'good' looks like for different measures in different contexts: for example, high customer value could indicate a good purchasing experience for customers or uncontrolled spending by a shopping addict.

Actions

- It is your organisation's responsibility to clarify what is a positive or negative indicator with regard to its own unique products, customer segments, types of vulnerability and so on. Conduct a thorough vulnerability audit or risk assessment and define the metrics that will allow you to monitor your safeguarding and quality of service
- Proactively build alliances with organisations who can help you better understand and service particular needs within your customer base

Industry monitoring

A system of checking and assessing customer interactions could be implemented; not just to identify poor practice, but to better understand and evolve the relationships between organisations and individuals as a whole. This could take the form of a thorough system of independent mystery shopping of organisations' customer communications, with results and recommendations fed back to aid best practice.

Overall vulnerability trends and best practice need to be regularly reported back to the wider industry in an accessible, authoritative and actionable format.

Intelligent, industry standard tools are required to help any organisation identify specific customer needs, according to a standard definition and methodology.

There is also a need for a standardised procedure for safeguarding against, responding to and potentially remedying any actions taken by a customer that were not in their best interests: for example, if they made an unaffordable purchase and need to cancel.

A risk index could be created to help organisations identify and score the vulnerabilities present in any given customer dataset. A service or software could be established through which organisations can run their campaign lists for analysis of the vulnerabilities present, enabling them to adapt their activities as a result.

Considerations and actions per channel

Face-to-face

- Ensure all customer-facing staff are fully trained and confident to identify and handle even the most unexpected or difficult customer needs. A standard, industry-wide training programme might be necessary to promote clear understanding of responsible face-to-face marketing and ensure consistency of standard and approach
- Vulnerability is complex to handle, particularly face-to-face, so support your front-line staff with a clear framework of guidelines, procedures, additional support and escalation policy
- It is crucial that front-line staff feel support from senior management to be able to put the customer's needs ahead of any short-term business needs, such as the pressure to make a sale. Ensure that staff performance indicators and incentives drive positive, best practice conduct and eliminate irresponsible behaviour, such as high-pressure selling. Complaints and customer feedback should play a major role in assessing front-line staff performance
- Give all customers the time and space they need to come to a rounded decision, not feel harried into making an on-the-spot decision. Consider using a two-stage purchasing process, in which a face-to-face interaction requires a later confirmation by another medium, to allow customers the opportunity to consider their decision in their own way and identify any concerns they still need to be answered. This can equally allow them to fully consider any upgrades or additional services you offer alongside their core purchase
- Use simple language in conversation. Make sure verbal explanations are standardised to be as clear as possible. Remember that the average reading age in the UK is just 11 years old
- Support face-to-face interactions with visual/physical versions of information to cater to different customer needs and aid clarity. Clarify the steps your agent is asking the customer to take. Take particular care to give customers the materials and time to properly digest longer or more complex information, such as product terms and conditions. Provide clear summaries of key information
- Create an effective system for reporting of vulnerability following face-to-face interactions. Keep a record at individual level if interacting with a known customer and identify broader trends within your customer base
- Is there a need for a door-to-door preference service?

Chat, phone and social media

- Use natural language voice recognition software to help identify vulnerabilities from key words and the stresses and tone of your customers' voices
- Keep automated phone systems very simple and easy to use. Ensure customers are not kept waiting long and do not have to listen through long messages. Always offer "go back" and "talk to a human" options. Keep language clear to hear and understand. Ensure customers can reach the person or service they need in three or fewer steps. Always provide the option to speak to a live agent. If appropriate, provide a multiple-language service
- Publish a clear, simple vulnerability policy so your staff and customers can see and work to the same rules. Ensure they live and breathe this policy: that it threads through everything your organisation does
- Ensure your agents are given robust training and leadership. This is the only way to ensure all conversations are consistent and each agent knows how to handle any situation appropriately
- Record any indications or declarations of vulnerability at the point of contact, including any particular requests a customer might make, and ensure these needs are automatically honoured at each future touchpoint
- Be prepared to work with anyone who is helping a vulnerable customer even if they don't have power of attorney. It is perfectly possible to provide a high level of support without breaching the customer's privacy: for example, you can suppress bill reminders if a relative reports that your customer is currently in hospital.

Digital/online, including email, search and mobile

- Digital media obviously offers huge potential to gather and use data to improve support for specific customer needs. For example:
 - Self-declaration, such as clicking through to a large print version of a webpage
 - Behavioural insight, such as identifying confused or illogical movement around a website, confused mouse movements, long dwell times, repeated password resetting, repeated unsuccessful search attempts, repeated uncompleted shopping carts, heavy or inconsistent purchasing behaviour or unusual credit card usage
- Offer support to any customer who appears to be struggling, such as offering live web chat with a customer service agent, a phone number they can call or a call-back option to save them the cost of the call
- Check for vulnerability at the point of contact, whether self-declared or detected: for example, asking “how are you today” on web chat, or asking for confirmation that the customer really has understood the terms or service before you process their payment.
- Build customer journeys with an eye on vulnerability: for example, raising a red flag after a certain number of touchpoints and providing alternative options
- Design digital experiences to be accessible for the greatest number of customers. For example, ensure that customers do not have to struggle with a small button on a mobile site or with jargon they can’t be expected to know. These usability considerations generally benefit all customers, not just vulnerable ones
- Offer a responsive digital experience that can adapt to suit any vulnerabilities declared or identified. For example, ensure that a website user can enlarge font size and that this preference is remembered for future visits; or if live chat is used once, it is promptly offered on subsequent visits
- Make sure that any vulnerabilities detected can be easily flagged on your record for that customer; and that these flags are translated into sensitive adaptations and customer service across all other touchpoints

Print media/advertising

- Make sure printed communications are honest, legible, easy to understand, easy to identify as a particular brand and easy to act upon. It is important that printed communications are consistent with other channels, with a clear, well-supported customer journey beyond
- Build safeguarding points into your post-print customer journey to check for vulnerable customers: for example, check for unusually high or seemingly addictive orders from a mail-order catalogue
- Make sure your communications and product packaging is appropriate. Package sensitive products or services discreetly, but also be aware that even a mainstream product could be unexpectedly sensitive for a particular customer: for example, if your product could have a different connotation within a particular cultural group. Support any customer who requests extra discretion or help in accessing your service or product
- Use data and insight from other sources to inform your printed communications: for example, use trends in your customers’ online behaviour to inform the language, imagery, colour and content you use in print
- Provide a clear opt-out on all targeted printed communications. For example, include the Mailing Preference Service website address as well as an easy contact point for the customer to opt out of your organisation’s mail programmes, either entirely or with regard to a specific campaign

Behavioural/data-driven

- Identify and monitor for any behaviours that might indicate vulnerability. For example, is it unusual to receive a particular combination or frequency of orders? Is your customer's delivery address constantly changing? Is the accumulative order value abnormally high for your customer base? Do the products or services being looked at or bought inherently indicate a vulnerability, such as legal advice, disability products or painkillers?
- Use existing insight around common customer life stages and cycles to predict higher-risk groups. For example, it is easy to predict that someone who has just retired might be going through some degree of emotional adjustment, and you can ask subtle questions to identify any vulnerability as a result. Create a vulnerability timeline/lifecycle for all customer segments to identify higher-risk vulnerabilities, the best means to diagnose them and the support you should provide for each
- Ultimately, you need to create a single customer view to ensure you can track customer behaviour across all areas and deliver holistic, responsible one-to-one marketing and customer service – to all your customers, as well as your vulnerable ones

Checklist: Approaches to vulnerability

Top tips for approaching vulnerability in your day-to-day activity

Make sure your organisation is fully aware

- Ensure your whole team is fully trained, with an essential awareness and understanding of what is meant by 'vulnerable' and the broad range of everyday causes of vulnerability, as well as the more obvious ones
- Assign one or two members of your team to be the go-to person(s) for vulnerability. Ensure they have the understanding and resources to provide full support, training and insight to your team and your customers

Look at everything you do from the perspective of different needs

- Audit the key vulnerabilities within your customer base. Understand what is required to mitigate each vulnerability
- Ensure all communications are responsible, easy to understand and easy to act upon correctly
- Segment your audience by product and service and consider the particular needs and vulnerability risks for each
- Make sure your organisation is easy to contact and deal with at every touchpoint. Provide a contact option via all relevant channels and always offer a "talk to a human" option
- Give your customer the chance to self-declare or fulfil their needs, such as offering alternative content formats
- Test to discover inclusive approaches that work well for all. Do not create alternative versions as an afterthought
- Provide easy, accessible ways for any customer to cancel or change a purchase they do not feel comfortable with

Ask your customer

- Simply ask your customer how they are and whether there is anything you can do to make interaction easier for them. Make this a key question during any real-time conversation and a clear option in other situations
- Double-check that your customer is completely happy with and clear about what they are purchasing before they complete the transaction
- Offer easy ways for your customer to declare any vulnerability. For example, offer easier-to-read formats or follow up after a purchase to check they are happy with their decision and the service they received
- Flag customer records with actionable information about how to meet their needs, rather than assuming 'do not contact'; and have clear procedures for meeting these: for example, flagging a need for Braille, large print, audio, foreign language transcriptions, specific channel preferences or extra customer service support
- Ensure a customer's needs only have to be identified once to be met across all interactions for as long as necessary

Ongoing assessment

- Keep checking in with your customer or assessing their behaviour as often as necessary to track changing needs
- Offer your customer the chance to increase your understanding of their needs at every touchpoint. For example:
 - Re-confirm consent at the start of each new transaction or campaign. Subtly ask different questions, such as "can we text you information about your order?" or "are our emails giving you the deals you're looking for?"
 - Offer help at key moments in the customer journey, such as at the checkout (both online and in-store)
 - Track the channels and formats each customer chooses and use this to build out your understanding of their preferences and potential vulnerabilities
 - Offer transcriptions of your interactions
 - Ask for customer feedback, including questions to uncover any specific needs



The DMA's role

DMA role, resources and opportunities to support industry efforts to mitigate vulnerability

To help your organisation evolve its ability to meet the needs of vulnerable customers, the DMA offers an array of training and resources to help you do this quickly and intelligently:

- The DMA Code lays out the key principles to underpin all one-to-one marketing activities, and to which all DMA members must adhere
- Best practice guidance for one-to-one marketing across data, email, contact centres and telemarketing, mobile, social media, door drops and inserts
- Train the trainers: a one-day workshop to teach you how to understand the needs of vulnerable consumers and how to train and support your employees to do the same

In addition, the Vulnerable consumer taskforce will continue its work to develop understanding and approaches to vulnerability, as well as guidance and training. Adding to this document and its specific guidance for call centres dealing with vulnerable customers released previously.

If you want to discuss how your organisation can improve its sensitivity to vulnerable customers or take part in the ongoing conversations by joining the taskforce, please contact [Rosie Atherfold](#) at councils@dma.org.uk or call [020 7291 3300](tel:02072913300).



About the DMA

A DMA membership will grow your business. Our network of more than 1,000 UK companies is privy to research, free legal advice, political lobbying and industry guidance. Our members connect at regular events that inspire creativity, innovation, responsible marketing and more. Most of them are free.

A DMA membership is a badge of accreditation. We give the industry best-practice guidelines, legal updates and a code that puts the customer at the heart. We represent a data-driven industry that's leading the business sector in creativity and innovation.

One-to-one-to-millions marketing attracts the brightest minds; individuals that will shape the future. By sharing our knowledge, together, we'll make it vibrant.

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