

Framework:
Developing a
Vulnerable Customers
Policy for External Use
January 2019

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Introduction

The DMA's Vulnerable Taskforce identified that organisations have struggled to develop policies to help support them support their customers who are in vulnerable circumstances.

Those organisations and their employees have found it difficult to deliver an appropriate and consistent level of service and have felt that they are failing their customers.

This framework has been created to help organisations to develop a customer facing policy on supporting customers in vulnerable circumstances.

The Taskforce has also created guidance on creating an internal policy for this and it recommends creating the internal policy before the external one. The internal policy explains why you should start with getting your internal policy in place first before you start on your external policy.

The framework has been put together by direct marketing professionals across several different industries and sectors to make sure that it is a tool that can be used by everyone. This guidance has been used successfully by both commercial and charity organisations to create their own customer facing policies.

This framework can be adapted to suit the needs of each individual organisation and their differing customer bases.

But why do you need a vulnerable people's policy? The primary need is so you can support your customers but also because you may have a regulator requirement to have one.



How to Use This Framework

This framework helps you to consider what to include when you are developing a vulnerable customers policy. Please use it in combination with your knowledge of your organisation and audience to consider what messages you want to convey. (See Developing Your Policy). This framework will help you to decide what to include and how to structure it (see Writing Your Policy).

How to manage your policy is covered later in this framework.

Please remember that this framework is here to help you make sure that your final policy does and says what suits you and your audience, and is something you can deliver.

Throughout this framework we'll use the term 'customers' to mean actual customers, potential customers, service users (for example for a charity), members and supporters etc. We also use the term 'vulnerable customers' to mean customers in vulnerable circumstances.

Developing Your Policy

This section will help you to work out what your organisation is aiming for, what you want to convey to your customers and who those customers are.

Your organisation's definition of vulnerability will be based on your operation, sector, approach and culture. The important thing is that you can share your definition with your customers in language that everyone understands.

What is the purpose of your policy?

Consider why you are creating the policy, everything else will follow from there. Focus on what you are aiming to achieve and communicate, not how you are going to do it. Remember, the main reason for creating a policy is to help your customers, not because the regulation requires you to.

Here are some useful questions to help you get started:

- How would you like to support vulnerable customers?
- What standards do you hold yourself to?
- What changes do you want to make for customers in vulnerable circumstances?
- What do you want customers to know about how you'll support them?
- Are you trying to be open and transparent to the public?
- Will this policy help to make your organisation more accountable (by having a set of public values)?
- Do you need to demonstrate that you have an external policy?
- Do you need to meet legal/statutory obligations?
- Do you need a means of channelling conversations with the public if the policy is displayed publicly?
- Do you need a means of managing conversations with the public if the policy is used when reacting to external situations?

You'll use your answers to inform your policy statement so it's important that you are confident in your aims and why you have them.

Developing Your Policy

Who is your audience?

When creating your policy, it's important that you address it to the right audience.

Consider if you are addressing the customer directly or a wider audience. You may be addressing a caregiver, relative or person who supports your customer.

Someone other than your customer such as a carer or relative may disclose a vulnerable situation regarding your customer to you. Such disclosures are important and should not be dismissed as they may help to explain why your organisation is having trouble contacting a customer. Consider how you will note this disclosure on your systems.

You may have more than one audience that is covered by your policy so it is a good idea to make sure that you are clear who you're addressing with each part of your policy.

It's also important that you are clear about your definition of vulnerability. Don't make assumptions about your audience as they may not believe themselves to be vulnerable. For example, if your service is for older adults, do not assume all will be frail, live alone and struggle with IT. Some of your customers may experience a more short- term vulnerability such as redundancy or bereavement.

Your customers may need to enlist the support of a someone else to act on their behalf, if they for example have difficulty hearing or have another impairment. This could be a friend, family member, carer, legal professional or social worker. It is a good idea to be clear in your policy document who can contact you and about what.

Writing Your Policy

This section will help you work out what to include in your policy and what order to put it in. Remember that this is a guide and it's your policy that you're writing. Use our framework to help you, but not to dictate you what to do.

Things to Consider: Layout, Style, Accessibility

Before you start writing your policy document, please bear in mind the following points to help you to shape it into a usable document for your audience:

- Define what 'vulnerable' means if you use the term.
- Will your customers identify with your definition of vulnerability? Using terms such as 'help' and 'support' might be more appropriate.
- This is a customer facing document so use customer friendly language, avoid jargon and internal terminology – use plain English.
- The document should be short and simple to read and understand. Avoid creating a document with too much detail; you can signpost to other documents and policies.
- Consider the layout to improve readability and understanding; consider the language your policy is written in is appropriate for the reading age of your audience. Did you know the average reading of the UK is 9-11 years of age?
- Use formatting to make the most of the document such as font size, colour and boxed sections to draw attention to key pieces of information.
- Consider the use of infographics and other visual prompts to display information so that customers can quickly and clearly understand your information.
- Consider how you will make your policy accessible to your customer, in what format(s) you will make this available to them and how they will access it – you may want to offer and signpost to alternative formats.
- Consider if it is needed to be translated into different languages. The top 5 languages in the UK are English, Welsh, Polish, Panjabi and Urdu (2011 Census).
- Can your information be accessed on a smartphone or tablet?
- Consider whether you need to refer to your privacy policy for further information or explain how you use customers' data.
- Do all your customers have access to a computer or internet if you provide links to other webpages or resources? How can they access paper or audio copies?
- Avoid negative sounding language which blames or stereotypes the customer. Consider phrases such as 'Have we made everything clear?', 'Could we do more to help?', 'Want to learn more'.

Structuring Your Policy

Below are suggested sections for you to include in your policy document. You may want to leave some out, add more of your own or rearrange the order.

Under each section heading is a description of what it is, what you might want to include and examples.

Writing Your Policy

Summary or Introduction

What is it?

A summary/introduction to explain why you have this policy and to introduce the policy. You may wish to avoid having an introduction and just have the objective.

What should you include?

Why you have the policy and what it's based on.

Example:

We are the third largest business in our industry. We have a commitment to caring about our customers. This policy lets you know, as our customer, how we will take your needs into consideration.

Objective

What is it?

What you're hoping to achieve.

What should you include?

What your desired outcomes are from having this policy.

Example:

We want all our customers to access our products and services in the easiest way possible.

Scope

What is it?

Description of what and who your policy covers.

What should you include?

Who your audience is, which parts of your business it applies to, which interactions and products it covers etc.

Examples:

This policy applies to Acme Group and all of its businesses. It includes all of our marketing communications and benefits all of our customers.

Policy Statement

What is it?

A short statement about your policy.

What should you include?

What your aspirations are, not how you're going to meet them. If you have more than one audience, make it clear which policy statements apply to which audience.

If you work with other organisations you might want to refer to your expectations of them (or in the Definitions section make it clear that when you refer to yourselves that you include your suppliers as well).

Examples:

- We aim to make our communications accessible (or provide a suitable alternative)
- We offer multiple ways for you to contact us if you have a question or a complaint.
- All of our staff will be in a position to understand your circumstances.
- Our offices will be accessible to all visitors.
- All of our suppliers follow this policy.

Writing Your Policy

Definitions

What is it?

This section is for explaining any legal or difficult words and to provide more information on what is included.

What should you include?

Definitions of terms used in the policy document e.g. vulnerable, who you include in your businesses/staff etc.

Examples:

Vulnerable customers - Whether a customer should be considered to be in a vulnerable circumstance will need to be assessed on a case-by- case basis. For some customers they will be facing a short-term unexpected challenge which may mean that they're in a vulnerable circumstance for a period of time. For others, they may be coping with a long-terms illness which may mean they will always require additional support from others. The final group may move in and out of vulnerable circumstances on an on-going basis. For this group they will sometimes need support, but at other times not.

'We' means Acme Group, all of our subsidiaries and any third-party representatives or suppliers.

Further Reading

What is it?

A list of additional documents or resources to help the customer.

What should you include?

Any document that you think will provide more help for the customer.

Examples:

Other relevant policies from your organisation.



Writing Your Policy

Contact Us / Support

What is it?

This section is to let the customer know what to do or where to go for help and support.

What should you include?

Information on where to go for support. Also, a chance to let customers' representatives know how they can get in touch with your organisation.

Examples:

Call us on 0800 xxxxxxxx to learn more. [Please include all your customer contact methods].

If you are a carer you can contact us on our customer's behalf. Just make sure you have their permission and account number.

Frequently Asked Questions

What is it?

A section to give answers to any common questions.

What should you include?

Information that will help the customer without the need to contact you. You may also want to explain what a customer should do in certain circumstances.

Managing Your Policy

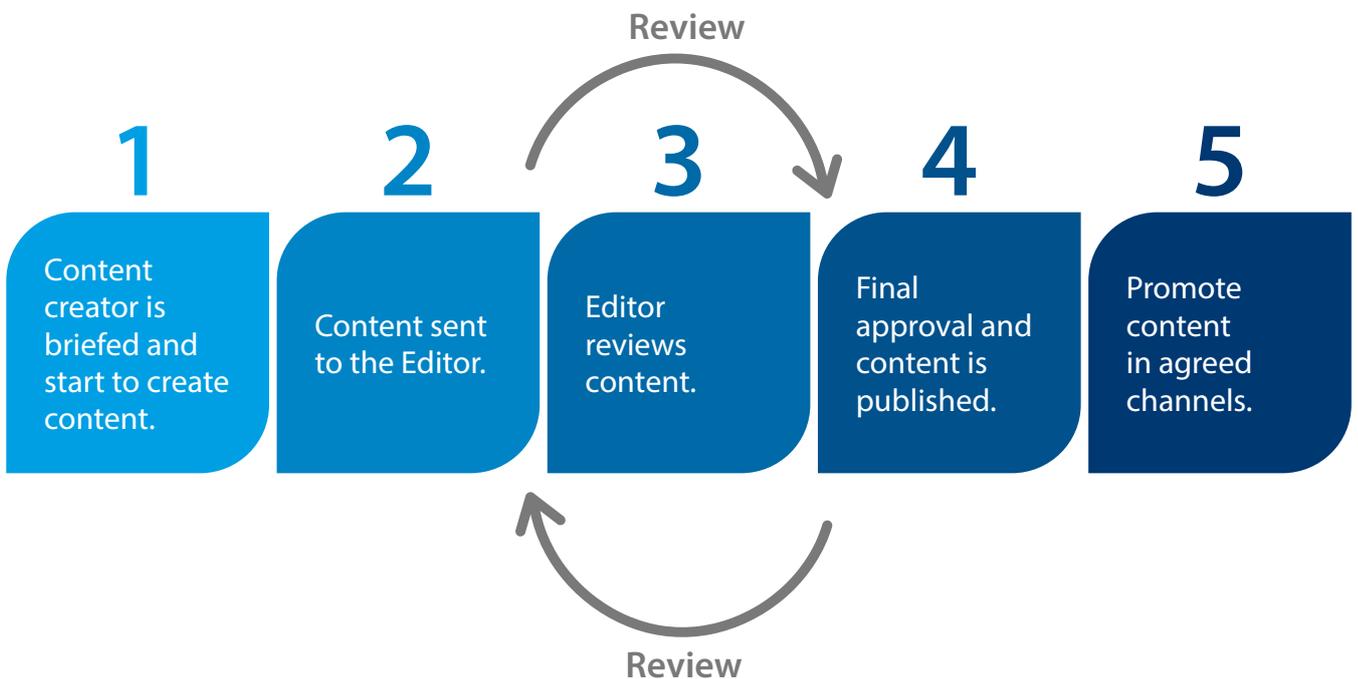
This section gives you a suggested process for creating a policy document and managing its lifecycle.

When creating your policy, think about which platform is best for you to host it on. Also, include a date of when you created your policy to show it is up to date. Then, you can review it 12-18 months later to ensure all your information is current.

An Example Process for Policy Creation

A policy can only be delivered effectively with an agreed and documented process. The process detailed here is simple but clear, which makes it easier to follow.

Work begins with the policy brief being sent to the content creator. An process of creation and review happens between the content creator and editor until the sign-off at stage 4. The policy can then published and promoted according to your agreed strategy, using your communications channels.



Source: IDM, 2016

Managing Your Policy

How to Manage the Lifecycle of Each Element of the Policy

All policies have a lifespan and different elements within the policy may have different lifespans. From creation to decommissioning, responsibility for its management and use must be appointed to specific individuals, and their position known by all members of the business.

The diagram here shows how to monitor and maintain your policy while the policy is in use, and that the policy is decommissioned when it becomes outdated.



Source: IDM, 2016

Helpful References

Below is a list of documents and sites that you may find useful when considering the topic of customers in vulnerable circumstances and creating policies.

Standards

- Direct Marketing Association (DMA)
 - [Code of Practice](#)
- Direct Marketing Association (DMA)
 - [Channel Guidelines](#)

Guidance and Law

- Your Privacy Policy
- DMA Framework: Developing a Vulnerable Customers Policy for Internal Use
- DMA – TRUST: Recognising Vulnerability and Making Reasonable Adjustments
[Training materials can be found here](#)
- DMA White paper: [Guidelines for call centres dealing with vulnerable consumers](#)
- FCA Guidance – [Consumer Vulnerability](#)
- The Fundraising Regulator
 - [Code of Fundraising Practice](#)
- Mental Capacity Act (MCA) 2005:
[Code of Practice](#)
- [Charities \(Protection and Social Investment\) Act 2016](#)
- Equality Act 2010: [Defining Disability](#)
- [Data Protection Act \(DPA\) 2018](#)
- Privacy and Electronic Communications Regulations ([PECR](#)) covers ePrivacy

Training

- DMA Masterclass:
[Recognising the needs of vulnerable consumers and how to make reasonable adjustments](#)
- TRUST: Free Training Materials:
[Recognising vulnerability and making reasonable adjustments](#)
- Samaritans
 - [Conversations with vulnerable people](#)

Additional Information

- ChildLine – [Get support](#)
- Scope – [About disability](#)
- [Alzheimer's Society](#)
- [Mencap](#)
- [Mind](#)
- [Dementia Friends](#)
- [RNIB](#)



About the DMA

The DMA is the professional association representing companies working in the UK's multi-billion pound data-driven marketing industry. Its vision is to create a vibrant future for Britain by putting 1-to-1-to-millions communication at the heart of business, even society: promoting organisation-customer relationships that are genuine, in touch with the individual's needs, inspiring, helpful and mutually beneficial.

It provides members with the strongest framework for driving success: the DMA code, unlimited legal advice, political lobbying, business-critical research, educational and networking events, niche tools and resources, the latest and most creative thinking and the greatest community of digital and direct marketing experts, leaders, shapers and creators to support and inspire.

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