

# Multichannel Guidance for Consumers in Vulnerable Circumstances

Responsible Marketing

**DM**  
Data &  
Marketing  
Association **A**

# / Contents

|                                 |    |
|---------------------------------|----|
| Acknowledgements.....           | 03 |
| Introduction.....               | 04 |
| General Principles.....         | 06 |
| Channels.....                   | 11 |
| Supply Chain Best Practice..... | 17 |
| Quick Review Tool.....          | 20 |
| About the DMA.....              | 22 |
| Copyright and Disclaimer.....   | 23 |

# / Acknowledgements

We would like to thank the following people for their contribution to this document.

[The Vulnerable Consumers Working Group](#)

[The Contact Centre Council](#)

**Elaine Lee**, ReynoldsBusbyLee

**Jacqui Workman**, KMB Ltd.

**Natalie Bailey**, NTT Fundraising

**Matt Radford**, Mind UK

**Rachel Goddard**, AXA UK

**Christine Bryant**, Whistl

**Andy Beck**, Global Life Distribution Ltd.

# / Introduction

A 2019 study by the Financial Conduct Authority (FCA) found that 50% (24.1 million) of UK consumers currently show one or more characteristics of potential vulnerability based on health, finances, and life events that could have a detrimental impact.

There has clearly been an impact on the numbers of customers affected by furlough, redundancies, and mental health illnesses as a result of isolation and lockdown. Following the pandemic, a 2020 survey by the FCA showed this number had increased to 53% (27.7 million).

Decreases in household incomes have led to customers / service users reviewing their financial outgoings and determining that they need to “cut-back.” To cancel subscriptions, downgrade packages, arrange payment holidays or overdrafts, etc., customers are getting in touch with their suppliers via their contact centres, causing a substantial surge in contact centre traffic.

This surge came at exactly the same moment contact centres were having to adapt their business processes to accommodate shielding colleagues, socially distanced workplaces, and others working from home, which often led to both a reduction in capacity and efficiency, as the supporting processes were not immediately available.

As a result, organisations have been trying to manage that capacity through accelerated digital transformation plans. The plans have involved directing customers to only call if essential and, when possible, to self-serve online. This has led to a substantial rise in the number of chatbots and IVR self-help routing systems being implemented rapidly without the ability to test the customers’ reaction to these tools.

At the beginning of the first lockdown, customers were understanding and more forgiving of slower service. As the months passed, expectations have increased and their appetite for improved service has returned. It’s therefore essential that contact centres and their organisations give due consideration to how well the imposed solutions meet their needs. This is particularly important for customers who find themselves in vulnerable circumstances and are at risk of being left behind, disenfranchised, or inadvertently discriminated against.

The language of ‘vulnerability’ is used commonly by most UK sectors, heavily explored within research, and referenced in regulations relating to consumer protections. Given the above statistics, it is extremely likely that all direct marketing will include potentially vulnerable groups and individuals (whether it intends to or otherwise).

We strongly believe that vulnerable consumers require protection and that direct marketing is essential in supporting vulnerable groups with services and opportunities to empower them as individuals, improve their lives, and bring about social change.

When legislation is considered unclear, marketers can be risk averse. This has the knock-on effect of causing conflict or disservice to vulnerable consumers or making their circumstances worse.

**Definition of Vulnerability** – for the purpose of this paper, we are using the **FCA's** definition: “A vulnerable consumer is someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when an organisation is not acting with appropriate levels of care.”

This definition was created before the coronavirus outbreak, which has increased the number of people in vulnerable circumstances.

# / General Principles

## Board-Level Ownership and Culture

Every organisation's culture should be supportive of customers in vulnerable circumstances. These are not bad customers: they are just customers requiring additional support during periods of their relationship with you.

Appointing a board-level 'champion' to meet this commitment can improve support to vulnerable households. This champion should be responsible for ensuring that the board is fully briefed on the organisation's commitment, including what this means in practical terms and for reporting how well the company is doing. Metrics and SLAs should be identified and discussed along with other key board metrics.

All customers, including those in vulnerable circumstances, should be permitted to provide feedback on the customer experience they have received. Feedback from customers in vulnerable circumstances should be given back to the board champion and proactively made part of the processes for customer journey mapping, experience reviews, and revisions.

## Governance and Controls

The board's vulnerability champion should have oversight and responsibility for governance and controls surrounding how vulnerability is identified, recorded, and managed across the organisation for both customers and colleagues. They should have access to appropriate and relevant management information that will drive the correct behaviours, which are in line with the company culture and values.

Organisations should start first with the development of an internally facing policy relating to customers in vulnerable circumstances. Once this is agreed and supporting procedures are identified and in place, the organisation can then publish a customer facing policy, outlining how they will support these customers with reasonable adjustments. Guidance for creating a policy can be found [here](#).

Organisations should ensure they are sufficiently resourced both a) in terms of enabling staff to reasonably support consumers and b) ensuring staff receive any relevant support they need to perform tasks and roles related to vulnerability, including supporting the health and wellbeing of the staff undertaking these activities.

## Culture Change and Vulnerable Consumers Policies

- Expect to interact with customers in vulnerable circumstances every day. If we accept the **FCA's** position that 50% of UK adults could be experiencing a vulnerable circumstance at any time, we should expect to meet vulnerability in every other conversation we have with our customers. Being prepared for these conversations will ensure that they result in better outcomes.
- Quality governance – quality assurance frameworks need to be integrated within all levels of an organisation.
- Controls – checks and balances are needed to help customers and empower staff to deliver fair outcomes. Staff should be confident in recognising a customer in a vulnerable circumstance and determining what is the most appropriate reasonable adjustment to best support their needs. Staff should feel empowered to make decisions and take actions.
- Ensure you are properly storing and reviewing the data you capture in line with your internal policy, as it may be special category data.

## Quality Assurance

With almost all contact centres having a quality assurance framework where customer contacts are monitored to ensure regulatory compliance, internal process adherence, and/or for the assessment of customer experience and outcomes, there should be an element built into quality assurance checks and measures relating specifically to the identification and management of vulnerable consumers.

These checks should also ensure that once consumers are identified, they are given the most appropriate journey or experience. This may not always require a reasonable adjustment to be made, but this will depend on the consumer's circumstances, vulnerability, and reason for their contact.

Quality assurance checks should be undertaken across all processes and customer touchpoints. They shouldn't be limited only to telephone calls, but all channels.

Consider using your quality assurance check as a way of ensuring integrity in the data you are capturing, especially in relation to vulnerable customers – is the vulnerability flag being overused, not used enough, and has it been correctly recorded? Without this key control, you won't always be sure that the reporting you have is accurate.

If the conversation moves from one communication to another, quality assurance checks should follow customer interactions across channels. For example, from live chat to the telephone or from social media to email. Where shortfalls in service are identified, corrective action should be taken to address the issues for future customers and redress the situation for any already affected customers.

As well as ensuring the checks and measures are in place, don't forget to set the standard early on. What is the KPI or objective for each colleague, team leader, and so on? Often it's the overall scoring; how this information is fed back is the key to ensuring continuous improvement as a result of quality assurance insights.

Reporting and management information is vitally important to demonstrate the embedding of a vulnerable customer approach, as well as providing a way of monitoring trends and risks.

When reviewing or creating reporting there are some considerations, including the audience and objective. For example, for board- or committee-level reporting, review current regular scorecards, dashboards, KPIs, and KRIs.

Could these be enhanced by drawing out further information in relation to the treatment of vulnerable customers, such as the number of complaints made by vulnerable customers alongside the quality assurance results where vulnerability has been identified?

Reporting regularly on the total number of vulnerable customers identified, as well as recording the number of times a reasonable adjustment has been made, is a great way of monitoring your front line. Tracking this in a rolling period as a percentage may provide early indicators if something is not quite right, as well as can provide assurance that the vulnerable customer system is performing as you expect it to.

Senior management reporting on a regular basis in relation to the progress of training programmes (as a percentage of colleagues completing the training) can be tracked. As well as considering some high-level metrics, it is valuable to provide specific reporting to different stakeholders.

Your marketing department will find it useful to know what characteristics of vulnerability to cater for, whilst compliance and risk functions may need more in-depth information about what adjustments are being made. Where you have a risk framework, set the risk appetites and key risk indicators (KRIs) early. These could include quality assurance results, complaint findings, or audit actions.

Agent-level statistics will be valuable to track at least each month – how many cases of vulnerability has one individual flagged; how many reasonable adjustments have been made; how does this compare to peers doing the same or similar role? You will quickly see the outliers and will have an indicator that more monitoring or training for the individuals may be required.

Lastly, use reporting in relation to vulnerable customers in your performance management policies. For example, you may set monthly or annual objectives that relate to efficiency, quality, or sales. Adding a specific objective for each colleague and reporting against it regularly will ensure there is buy in from all, and you can demonstrate this is an important part of their role.

## Training

- Training should be considered an ongoing opportunity for the learning and development of understanding vulnerable circumstances. How can they affect and influence customer behaviour discussed in each session?



Staff should also be trained on how any technology supporting systems work and how they integrate with the processes and policies held by the company relating to customers in vulnerable circumstances.

Examples of technology that can be used to support people in vulnerable circumstances may include text to speech and screen readers. [The Web Content Accessibility Guidelines \(WCAG\)](#) can provide further information on making websites accessible.

- All frontline staff interacting with customers, irrespective of contact channels, should receive regular training and coaching on how to recognise customers in vulnerable circumstances and to know what reasonable adjustments that the organisation can offer.
- Regular coaching sessions should take place as part of an ongoing commitment to learning and development.
- Staff in supporting roles, such as compliance, complaints handling, and quality assurance, should also participate in regular training and coaching sessions.

Less customer facing roles may also benefit from this training, such as those responsible for the design of customer marketing and documentation, as well as IT professionals who may be responsible for developing some of the platforms customers or colleagues are regularly interacting with.

- As part of organisations' duty of care, HR teams should receive training around vulnerability, so they can understand the experience of staff interacting and adjusting for those in vulnerable circumstances.
- Staff should be skilled and empowered to identify and assist a customer in a vulnerable circumstance without having to escalate or transfer calls or contacts.

## Staff Well-Being and Training

- Staff should be confident in recommending the correct / most appropriate channels for each customer.
- Create a culture that provides front line colleagues with autonomy to do what is needed for vulnerable customers, such as authority limits or ways they can bypass processes and policies, if it is required and appropriate for the vulnerable customer and promote this internally.

Highlight success when it is done well and ensure that when mistakes are made, they are not 'scolded,' but the information is used to improve understanding.

- Ensure that training content is regularly reviewed and staff have regular training sessions.
  - Set expectations at the recruitment stage. If your staff are regularly going to be in contact with customers in vulnerable circumstances, be upfront in the recruitment phase and reassure them that they will receive ongoing learning and development to support them whilst they perform the role.

- Acknowledge this in all reviews, coaching sessions, etc. Even if there is nothing to improve, it is worth recognising that the company takes this issue seriously and is aware this member of staff is doing a great job.
- Ensure existing accessibility technology is available. Review what technology is available and ensure that staff can access and know how to use the tools. For example, MS Office suite now includes accessibility checkers and tools.
- Involve staff in the product design service to champion those with different vulnerabilities.
- Involve vulnerable circumstances when creating customer personas, which allow brands to better understand key traits within audience segments and to design and review products / services.
- Utilise 'lived' experiences from your staff. For example, get visually impaired staff involved.
- Be aware of how agents own vulnerable circumstances and how accessibility needs can interact with their roles.
  - This can be in relation to recognising vulnerability and the subject matter of the interactions they are having.
  - During the recruitment process, make it very clear to what level the role will be dealing with consumers in vulnerable circumstances.
  - This should be an ongoing process that is made clear to existing staff to account for changing circumstances.

## Recognising Consumers in Vulnerable Circumstances

There are many different circumstances that can create vulnerability, and it's important to recognise that there is not a 'one-size fits all' solution.

- Some customers will experience their vulnerable circumstances in a transitory way. For example, someone with bi-polar disorder moving between states, a type 1 diabetic experiencing a hypoglycaemic episode may find themselves feeling vulnerable for a few minutes until blood glucose levels return to safe levels.
- Permanent. For example: hearing impairment, sight loss.
- Progressive. For example: dementia, MND.
- Temporary. For example: bereavement.

# / Channels

Consider the impact of your service levels on the customers in vulnerable circumstances to ensure that you are not inadvertently discriminating against them. For example, if the consumer is not able to communicate by telephone, (for instance, if they're hearing impaired), they are at risk of receiving a poorer service from the organisation, simply due to the communication channels open to them.

A key part to this is ensuring any applications are joined up and key data about consumers is available across all channels. Ensure any channel additions you buy can integrate to your CRM to provide information about consumers easily to agents.

## How to Measure Best Practice in Each Channel

The journey through channels will vary depending on the purpose of the interaction. Make the journey as easy as possible for the consumer. Make readjustments for customers when they cannot complete things in a specified format (for example, put a complaint in writing).

Across all channels, you should ensure the communications are saved against the customer record in your CRM system. There should always be an established escalation process, especially for automated channels.

## Telephone (Including IVR)

- Consider the content of call scripts – are colleagues able to read these in a way that is adapted to the customer, or do you require them to read statements word for word? Do you have points in a call that ensure understanding, asking 'do you understand that?' or 'would you like me to cover that again?'
- Consider how the agent is to proceed with the call or terminate it and ensure this is done with tact and without causing offense.
- Vulnerability may be highlighted after a financial transaction has taken place. Consider what processes are to be followed in these instances.
- Consider what processes are in place on the screen for the agent to record the action taken and reason (see more detail in the Data Recording section).
- If the consumer is deemed as vulnerable, consider what future communications are appropriate. Are safeguarding / signposting procedures in place and simple for agents to utilise if required?

Where there is an element of doubt, what action should be taken? Options could include escalating a live call to a manager or specialist, reviewing call recording, calling back a consumer, or a written correspondence.

- Managers should have visibility on numbers of vulnerable consumers – this allows them to identify potential training issues (or concerns with the data).

- Whilst IVR (Interactive Voice Response) systems can enable some enquiries to be handled in an automated way, it will be impossible and impractical to handle every enquiry this way. Therefore, IVR systems should always have an option to allow a customer to speak to an agent.
- Consider the number of layers that a customer will need to navigate when using an IVR menu system. We would recommend no more than two to three layers. Within every layer of an IVR system, there should be an option to return to the main menu or step back one level to prevent customers who have selected the wrong option having to hang up and redial.

## Call Waiting Times

Call waiting times should always be monitored and performance assessed against the agreed and potentially published service level metric. When customers are facing unacceptably long wait times, remember that not all customers can access alternative channels such as websites.

Consider the impact of a customer waiting several minutes or hours and the cost of calling on their financial and physical resilience. Reasonable adjustments include dynamically advising customers what the current wait times are or offering call backs.

## Live Chat/Web Chat

Do not have 'time-outs' or offer the option to disable time-outs and, when these are required, ensure they are reasonable and do not disadvantage vulnerable customers. Using prompts timed at reasonable intervals may be an alternative to ensure the person is still there if no activity is detected. It may be helpful for the prompt to include an offer for external help with the task.

Give the customer the option to download and save the conversation, so they can reference it again at a later date. Also ensure this is saved against the customer record in your CRM system.

Use language that is appropriate for the channel and each customer. Don't copy and paste text from websites into your reply. Instead, use the mirror-and-match technique to enable the customer to follow the conversation, using terms that they're familiar and comfortable with. Avoid using jargon and acronyms: remember your customers don't know your internal processes or systems and product names.

If it becomes clear that a customer needs more attention from an agent than the current process will allow, reduce the number of live chat sessions that the agent is involved with, so that they can fully focus on the customer. In addition, you should offer the customer to switch the conversation to another channel. For example, a phone call which may better support their needs. An escalation process should be established for all automated channels of communication.

## Chatbots

Ensure that the chatbot has been 'trained' before launching the service. Whilst it will require real conversations to build its knowledge and understanding, it's worth recognising that the level of service that can be offered during this learning phase will be diminished. Customers in vulnerable circumstances should not be penalised during this phase.

## SMS

Some customers may prefer to communicate via SMS, as it allows them to retain a copy of the conversation. Ensure that each message is short and to the point, so that it can be easily read and understood. Also ensure all forms of communication are saved against the customer record in your CRM system.

Use appropriate language and avoid internal terminology and jargon. If emojis are used, ensure that they are widely recognised by the audience you are communicating with. Emojis should be used to support rather than replace text.

## Email

Consider whether your response time is appropriate for customers in vulnerable circumstances. If a customer is anxious, having to wait 24 hours for a reply can further distress them. It may be more appropriate to switch communication channels to facilitate a faster response and confirm that conversation in writing in a follow-up email.

If you don't have an integrated CRM system that allows you to manage communications across channels based on a vulnerable customer flag, due consideration needs to be made as to how this can be achieved across non-integrated systems.

## Direct Mail and Incoming Mail

Consider how your customers in vulnerable circumstances respond to direct mail. For example, does it always prompt a reaction, as the customer feels a need to respond, irrespective of the letter's contents? Does a charity's thank you letter trigger another donation?

The use of mail has significantly reduced in recent years as a way of customers communicating with organisations. Consider why this customer has chosen to write to you, as opposed to picking up the phone or sending an email, and review which is the most appropriate channel for you to respond.

## Messenger Apps (WhatsApp, Messenger)

Use appropriate language and terminology. Avoid jargon and acronyms: remember that your customers don't know your system or process names, and this may be their first time taking this action, whilst it could be your one-thousandth.

If using emojis, ensure that they are widely recognised by the audience you are communicating with. Emojis should be used to support rather than replace text.

## Social

Remember that any messages published on a social channel are visible to all customers, not just the one that you are interacting with, and you have no control how other customers / readers are interpreting your messages.

It may be more appropriate to move a conversation from a broadcast post to a more private DM or to switch the customer to an alternative channel, such as phone or email. However, you should also signpost to other readers that this action has been taken, so that they don't perceive that you are simply ignoring the customer.

Choose language that is appropriate to the channel (typically social communications are less formal than emails and letters). The language and tone should always remain professional.

If emojis are used, ensure that they are widely recognised by the audience you are communicating with. Emojis should be used to support rather than replace text.

## Websites

- Have accessibility options for visual impairments. For example, change the font, font size, and/or colours, remove pictures, offer foreign languages, etc.
- Use simple English with no jargon.
- Always provide details for the customer to be able to contact you via other channels, clearly and visibly. Do not make it difficult for customers to find details of how to contact you.

Further information is available at [WCAG](#).

## Self-Serve Portals in Apps

Always use appropriate language and terminology to avoid customer confusion. Keep the steps simple and well signposted. If customers require any information to complete the steps, be clear on the number of steps involved and alert customers before they start the process. Make sure the options available on the app are the same as on the website.

If you need customers to key in information, ensure that the correct keyboard is presented. For example, a number pad for credit card details, rather than the letter keyboard.

## Face to Face

Be sensitive to the location where the interaction is taking place and consider whether a more private location would provide the customer with a better experience.

For example, if a customer visits a bank to advise of a bereavement and to remove a partner's name and signature from a joint bank account, consider whether taking them to a private meeting space would be more supportive, rather than trying to handle the service at the counter in a more public space.

If you are taking a kit or materials with you for the customer to read or look at, consider whether they can be adjusted to better suit the needs of a visually impaired customer. For example, can the font size or font styles be adjusted?

No customer should be disadvantaged using the channel they choose to engage with your business. For example, if you need to highlight exclusions or key parts of a product or service, these should be disclosed to the same level of detail and quality across all channels.

## Recommendations for All Channels

- Always have an option to talk to a person.
- Be confident to recommend for a customer to switch to a more appropriate channel and make a note for all future conversations.

For example, if there are indicators that a customer may be struggling with comprehending information provided in writing, make the recommendation to use your contact centre's phone lines and record the recommendation, so the customer isn't accidentally directed back through an inappropriate channel.

- Allow customers to choose the channel most appropriate for them.

- Have the ability to reroute calls to a specialist, ensuring that this rerouting is signposted to the customer.
- Join up data across all channels to make agents and staff aware of customer situations.
- Use simple English and avoid jargon.
- Consider your audience/channel appropriateness.
- Literacy and numeracy: literacy and numeracy rates in the UK are falling, with the average reading age of a UK adult assessed to be nine to eleven years of age. The average numeracy skills of adults are also reported to be nine years of age, so use language and financial illustrations that any customer can read and understand.
  - If you must provide legal text within policy documents, also provide a simple English version alongside the text, so that the reader is able to easily follow the terms and conditions.
  - Use the Hemingway App to assess the readability of your documents.
- Consider the below as potential common vulnerable circumstances when designing accessible communications:
  - Visual impairment
  - Audio impairment
  - Comprehension impairment
  - Limited access to the internet/smartphones

## Consider the Purpose and Content of Your Communication

Examples:

- If you are selling a simple 'every day' product or service, you may use multichannel marketing, but if you are disclosing complex information and need a decision to enter a customer into a contract, you need to consider the appropriate channel.
- When there is an uneven playing field between the business and customer, because the business will understand the product and/or service, but the customer may not have interacted with it before.
- If you are using contact centres for a complex financial product like life insurance, pensions, etc., you may need to complete additional checks to ensure vulnerable customers have comprehension and are in the right frame of mind to make such decisions and enter into contracts.



# / Supply Chain Best Practice

## Data Recording – Consent and Consent Withdrawal

- Explain to the customer why it would be helpful to have a recorded note of consideration or need for a reasonable adjustment. Never record without informing the customer or gaining their consent.
- Consider how you will handle future comms if that consent is withdrawn.
- Be objective in recording data – refer to the requirements / conversation, not the person.
- Have a policy around reviewing the recorded vulnerable data. Who has access? How frequently is it reviewed? Who can amend, update, and remove this data? How are changes / updates / removals communicated to staff and the customer?

## Regulatory and Legislative Considerations

- [Equalities Act](#) (this replaced the Disability Discrimination Act)
- [Data Protection Act](#) (2018)
- [Mental Capacity Act](#) (2005)
- [Distance Selling](#) and [E-Commerce Regulations](#) (DSR and ESR's)
- Regulatory obligations which will be specific to your industry
- [DMA Code of Practice](#)

## Signposting to Additional Resources

- Signpost to provide internal and external support for customers
- Signpost to provide internal and external support for staff

## Coronavirus Considerations

Coronavirus has had a detrimental impact on mental health and wellbeing in the UK, as well as on our physical health and finances.

- The number of adults showing some signs of depression has increased to almost one in five since the beginning of the pandemic. Nearly 85% of respondents said their symptoms were related to increased stress and anxiety (ONS, 2020).
- There has been a 15% increase in the number of adults showing characteristics of vulnerability from February 2020, making the overall proportion 53% of all UK adults (FCA, 2020).

- “More than half of adults and over two thirds of young people said that their mental health has got worse during the period of lockdown restrictions from early April to mid May.” ([Mind, 2020](#)).
- Coronavirus caused national income to fall by 20% in April 2020, with the poorest households seeing the highest reductions, with a fall in their median household earnings of around 15% ([IFS, 2020](#)).
- The Money and Pensions Service are anticipating an additional eight million adults will require free debt advice in 2021, many of whom will be experiencing debt for the first time ([Money and Mental Health Policy Institute, 2020](#)).
- Following the pandemic, “hybrid” solutions were employed. For example, opening sensitive documents with at least two people is now done with the second person dialling in virtually. Consider what needs to happen if these become longer-term solutions.
- Consider the impact on staff working remotely. How are managers keeping a caring eye on their team members compared to those they see in a work environment?
- Many members of the public have been labelled ‘vulnerable’ in terms of their health risk if they contracted covid (for example, those with asthma) and may reference this in communications – but this may not necessarily be a vulnerability. Flag in terms of making an informed marketing decision.
- Review your debt recovery policies. How can you take into account people’s individual circumstances?

## Technology

Technology is advancing rapidly to provide tools for customers and contact centre staff to use when handling contacts with customers in vulnerable circumstances.

Whilst technology owners may claim that their tools can automate functions – for example, quality assurance scoring using speech / voice analytics – we strongly recommend that those tools are used to support the advisor or quality assurance manager, rather than replacing their role.

Use technology to support but not replace agent intelligence. Sometimes an agent’s ability to ‘feel’ that something is not quite right can be invaluable.

If you are automating processes around tracking, especially web-based, consider how this may have a detrimental impact on consumers in vulnerable circumstances whose behaviour may not fit regular patterns.

- Microsoft products now come with inbuilt accessibility checks to ensure your staff know how, when, and why they should use these tools.
- The ReciteMe tool offers a menu bar that allows a website user to personalise the appearance of the website to suit their individual needs.

- The InterpreterNow tool is a service that enables people with hearing loss to communicate with each other. We deliver immediate access to online interpreting for British Sign Language (BSL) users. The service can be accessed through any laptop, PC, Mac, Android, or Apple tablet and smartphone via the InterpreterNow App.
- Live Transcribe provides a real time subtitling app via your phone or tablet. This can be used to aid hearing in circumstances where a mask / face covering is being worn. For example, face-to-face meetings.

# / Quick Review Tool

|   | Telephone (Including VCR) | Web Chat/ Live Chat | Chatbots      | SMS | Email | Direct Mail/ Incoming Mail | Messenger Apps | Social | Websites      | Self-serve Portals | Face-to-Face  |
|---|---------------------------|---------------------|---------------|-----|-------|----------------------------|----------------|--------|---------------|--------------------|---------------|
| Simple English and maths                        | Yes                       | Yes                 | Yes           | Yes | Yes   | Yes                        | Yes            | Yes    | Yes           | Yes                | Yes           |
| QA monitoring                                   | Yes                       | Yes                 | Yes           | Yes | Yes   | Yes                        | Yes            | Yes    | Yes           | Yes                | When possible |
| Centralise history for known consumers          | Yes                       | Yes                 | Yes           | Yes | Yes   | Yes                        | Yes            | Yes    | When possible | Yes                | When possible |
| Option to speak to a person                     | Yes                       | Yes                 | Yes           | Yes | Yes   | Yes                        | Yes            | Yes    | Yes           | Yes                | Yes           |
| Visual accessibility (font and format/layout)   | N/A                       | Yes                 | Yes           | N/A | Yes   | Yes                        | N/A            | N/A    | Yes           | Yes                | When possible |
| Personalised content (with alternative options) | Yes                       | Yes                 | When possible | Yes | Yes   | Yes                        | Yes            | Yes    | N/A           | N/A                | Yes           |

| Alternative language options                         | When possible | When possible | When possible | When possible | When possible | When possible | When possible | When possible | When possible | When possible | When possible |
|--|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Option to meet/talk virtually (instead of in person) | N/A           | N/A           | N/A           | N/A           | N/A           | N/A           | N/A           | N/A           | N/A           | N/A           | When possible |

# / About the DMA

The Data & Marketing Association (DMA) is the driving force of intelligent marketing.

Guided by our customer-first principles enshrined in the DMA Code, we champion a rich fusion of technology, diverse talent, creativity, research, and insight to set standards for the UK's data and marketing community to meet in order to thrive.

We deliver this mission through a fully integrated classroom-to-boardroom approach that supports you, your team, and your business at every stage of your development.

Through DMA Talent, we create pathways for the next generation of marketers; our world-class training institute, the Institute of Data& Marketing, delivers learning to corporations and individuals; and through the DMA, we deliver advocacy, legal, and compliance support, as well as research, insight, and a packed events calendar.

With more than 1,000 corporate members, we are Europe's largest community of data-driven marketers.

[www.dma.org.uk](http://www.dma.org.uk)

# / Copyright and Disclaimer

'Multichannel Guidance for Consumers in Vulnerable Circumstances' is published by the Data & Marketing Association (UK) Ltd Copyright © Data & Marketing Association (DMA). All rights reserved. No part of this publication may be reproduced, copied or transmitted in any form or by any means, or stored in a retrieval system of any nature, without the prior permission of the DMA (UK) Ltd, except as permitted by the provisions of the Copyright, Designs and Patents Act 1988 and related legislation.

Application for permission to reproduce all or part of the Copyright material shall be made to the DMA (UK) Ltd, DMA House, 70 Margaret Street, London, W1W 8SS.

Although the greatest care has been taken in the preparation and compilation of this report, no liability or responsibility of any kind (to the extent permitted by law), including responsibility for negligence is accepted by the DMA, its servants or agents. All information gathered is believed correct at January 2021. All corrections should be sent to the DMA for future editions.