

Customer Focus



Recognising Vulnerability & Actions

We appreciate that in the course of our work we often come into contact with potentially vulnerable customers. **Reventus** are always proactively seeking to identify those that may be considered vulnerable throughout all of our processes. As a result, when dealing with potentially vulnerable people, we follow strictly the "Taking Control of Goods" regulations, together with advice given by the Civil Enforcement Association (CIVEA) and the National Standards for Enforcement Agents. They are all quite clear in stating that enforcement agencies, their employees and creditors must ensure that the genuinely vulnerable and socially excluded are protected. This statement is also considered in conjunction with the company's Code of Conduct.

We recognise that we have a role in ensuring that the vulnerable and socially excluded are protected and that our recovery processes include procedures agreed between the company and the client about how such situations should be dealt with. Early intervention with the vulnerable person and various partners in service delivery is crucial in managing areas which are potentially problematic. **Reventus** works proactively with other agencies ad sharing information, only with the customer's permission and only as appropriate, with them about the customer.

All of our staff including enforcement agents have received vulnerability training which was carried out by one of our directors who has attended a course by the "Money Advice Trust on Vulnerability Training for Enforcement Agents". We also work closely with StepChange, CAB, Money Advice Trust, and Royal College of Psychiatrists on updating our training.

We have developed a bespoke training course focusing on dealing with vulnerable groups and involve modules designed following consultation with the CAB and StepChange. All our staff are trained to be able to identify potentially vulnerable persons and what actions are required. Our Vulnerability Training Includes:

Safeguarding Vulnerable Groups Act 2006, Equality and Diversity Act 2010, Identification of Vulnerability, Conversations with Vulnerable People, assisting those with Vulnerabilities, local authority vulnerability guidelines, Suicide & Self-Harm Awareness, Disability & its Impact on People in Debt, Debt and Mental Health, reporting and escalating

We appreciate that potential vulnerability may be identified at any time during the enforcement process by our Clients, our Telephone Team, Visiting Welfare Officers, Enforcement Agents (EA's) or CAB or other similar agency. There will be cases where vulnerability is clear, equally there are likely to be cases where vulnerability is claimed but with little or no evidence to support this. To resolve this, we have a Welfare Team, who will contact the customer (or their advisor / representative - with the customer's permission) and

sensitively request information and evidence, or to assist with clarifying the situation. We may ask one of our Welfare Officers to visit the debtor to assess the circumstances and decide if they are definitely vulnerable. Deciding on questions of vulnerability is agreed in conjunction with our Clients and their guidelines.

On receipt of a Liability Order, our propensity checking process will try and identify those that may be vulnerable or have financial problems at the start of the process. This continues throughout the whole of the process via customer communication with both our internal and external staff.

IDENTIFYING VULNERABILITY - WHAT TO LOOK OUT FOR

In line with our training and external guidance we have set out procedures on how to try and identify vulnerability, which is not always obvious, and then the processes on how to deal with the liability order.

Looking for 'Limitations' –

Identifying debtors who experience difficulties with remembering, understanding, communicating and evaluating information during the collections process.

Look for 'Red Flags' – These are indicators of difficulty, distress or life events that could highlight an underlying vulnerable situation. Such as admittance to hospital, serious health conditions, mental health concerns, poverty.

IDENTIFYING VULNERABILITY AT EACH STAGE

Compliance Stage: As soon as a case is passed to us, our processes are proactively trying to identify vulnerability by the following ways:

Propensity to Pay: Every case received is profiled to establish the debtors' propensity to pay. Various checks such as Credit, CCJ, post code analysis and other collection data.

Linked Cases: All new and existing cases are linked by name or address to ensure a single point of reference.

Vulnerability Flag: deemed to be vulnerable will be "flagged" on our IT system to ensure that they follow our vulnerable case processes, any that have vulnerability flags are automatically highlighted if further new cases are received.

Visiting Officer: Trained officers from our Welfare Team will visit at compliance stage to engage with the customer to establish the situation, status and advise accordingly.

Financial Budget Form: Used to establish the financial situation and the vulnerability of a debtor,

Correspondence: All our letters and forms detail independent free debt advice options.

All cases deemed to be vulnerable are notified to our Clients and discussed prior to any action being taken.

Enforcement Stage: *The EA will often be the first to make contact with a vulnerable or potentially vulnerable debtor. All of our EA's take ownership of a case and will assess the case throughout the process.*

In situations where vulnerability is obvious to the EA he/she will not, remain or re-enter the premises if the only person present is vulnerable. They will always withdraw.

In the case of obvious vulnerability and the EA feels that enforcement action is inappropriate he will liaise with our Client or return the case to the office for the Welfare Team to consult with them.

Although the Regulations provide that an EA may take control of vulnerable persons' goods and that they must be allowed an opportunity to seek advice and assistance before they incur an enforcement fee, we will still withdraw and pass the case to the Welfare Team. They will remove any enforcement fee already charged, make contact with the debtor and assume responsibility for the conduct of the case, in conjunction with advice from our Client.

If a case is identified where the he/she considers the individual debtor to be "at risk" the EA, they will call an appropriate third party; police, Council safeguarding team and advise the Council. If a Debtor threatens self-harm or expresses suicidal tendencies the matter will be raised with the Council and reported to the Police/local Social Services. Agents will not leave premises until support services arrive.

Where unsure, Reventus staff will always proceed with caution and never underestimate the seriousness of the vulnerability, and ensure the appropriate action is taken.

Before leaving, Reventus' EAs will, if appropriate try to obtain evidence (medical form if appropriate or BWC recordings, if previously agreed, leave a debt advice pack, including details of closest advice agency, advise the Councils of the circumstances, and pass the case to our Welfare team.

Where vulnerability has been identified the enforcement fees are always removed.

Telephone Team: *Debtors may make contact with Reventus at any stage of the enforcement process and may advise us that they consider themselves vulnerable. The contact may be by 'phone, letter, e-mail, during a visit to our offices. Alternatively, the debtor may not say anything about being vulnerable but the content of their communication may suggest that they are vulnerable / potentially vulnerable. We will obtain as much information as possible, in a sensitive manner, especially where the contact is by phone or during a visit to our offices. We always obtain contact information e.g. a phone number and / or e-mail address.*

At any stage during the above processes where Vulnerability appears to be a possibility, the case is referred to our Welfare Team who will assume responsibility for the conduct of the case.

Welfare Support Team: There will be cases where vulnerability is clear. Equally there are likely to be cases where vulnerability is claimed but with little or no evidence to support this. The Welfare Team will contact the customer (or their advisor / representative – with the debtors permission) and sensitively request that we are provided with appropriate evidence e.g. medical records, income and expenditure details etc.

Decide if Vulnerability Exists and if it is a Relevant Factor: Having obtained the evidence our Welfare Team will decide if the customer is indeed vulnerable and whether they have the ability to deal with the debt. In most circumstances we will make this decision in conjunction with our Client.

The Welfare team assesses vulnerability by using our own Vulnerability Assessment Module during an interview. We will ascertain:

- **What is the situation/severity?**
- **How long has the situation been going on?**
- **Has it happened before?**
- **Are they getting help?**

Once we have obtained the information we will:

- **Thank the debtor for the disclosure of their vulnerability,**
- **Explain how the information will be utilised,**
- **Get their permission to record the information,**
- **Ask key questions to assist in assessing the situation,**
- **Consider signposting to CAB or other voluntary agencies,**
- **Discuss with our Client** – Reports - Reventus provide the Councils with case updates via ClientWeb, real-time reports and monthly vulnerability reports, enabling you to monitor cases, as and when required.
- **If the Client is notified directly** of vulnerability they can hold and return the case via ClientWeb or make a direct call to our dedicated Welfare team, guaranteeing immediate action.

Determine How to Proceed: If it is accepted that the Customer is vulnerable and relevant there are a number of possible courses of action and our Welfare Team will determine which is the most appropriate, in conjunction with our Client:

- **In some circumstances the vulnerability may be such that any further enforcement action is clearly inappropriate, and these cases will be returned to the Client with a full report,**
- **In other cases, the circumstances will present an obvious solution,**

- Assistance from an interpretation service where the debtor is unable to speak or understand English or provide information in large print or Braille for customers with impaired sight,
- The suspension of action for an agreed period (periods agreed with our Client) where there has been a recent bereavement or the customer is in the latter stages of pregnancy,
- We may agree an interim payment arrangement during this suspension period,
- Where it is determined that Vulnerability does not exist, the Welfare Team will spend time to ensure they understand the individual's problem and assist them to identify possible solutions. They will provide guidance and support on ways to help the debtor take control of their finances and begin to remedy their financial, medical or mental health situation including referring to them to appropriate advice agencies e.g. Stepchange Debt Charity, Mind, CAB, Age Concern, Scope etc.
- Conduct personal assessment visits, by appointment, where this is considered necessary.
- Help customers understand how to prioritise their debts and negotiate a realistic and manageable payment arrangement. Consult with our Client where this is outside of your normal parameters for payment arrangements.
- Make every effort to contact the customer by phone, e-mail, text message or letter if they default on the arrangement and allow a greater degree of leeway than would normally be given in the case of a broken arrangement.
- If the customer is uncooperative and the vulnerability is not severe it may be necessary to restore the case to the normal enforcement process. However, the Regulations require that the debtor be given time to seek advice and assistance and a minimum period of two weeks should be allowed before action is recommenced. We will agree the timescale at the start of the contract.
- Ensure that any enforcement fee is removed, as required by the Regulations
- Every decision relating to these cases is double checked by a manager unless the proposed next course of action been agreed with our Client.
- Any severe or complex cases are overseen by a Director in liaison with the client.
- Work closely at all times with third parties and voluntary agencies to make sure we get it right.



5th March 2018

This document should be read in conjunction with the "Reventus Vulnerable Persons Policy"