



# REVENTUS

## Vulnerable Customers Policy

We recognise that certain groups of customers may be vulnerable. Reventus are committed to treat all people fairly and with respect. This policy places an obligation to all our staff to acknowledge and consider the needs of vulnerable customers in the course of their work.

All customers are different, with a wide range of needs, abilities and personal circumstances. These differences can put individuals in a position of vulnerability when interacting with Reventus. For example, a customer in a vulnerable situation may have difficulty:

- obtaining or assimilating information;
- accessing or choosing suitable services;
- making decisions in their best interests;
- understanding their rights or pursuing complaints

Customers in vulnerable situations may be at a higher risk of experiencing negative outcomes such as financial loss, exploitation or other detriment, our systems, policies and processes can reduce or exacerbate consumer vulnerability and the risk of detriment occurring.

At Reventus our enforcement agents, staff and Welfare Support Team recognise that they have a role to play in ensuring that the vulnerable and socially excluded are protected and that the recovery process includes procedures are in line with the regulations, our clients' requirements and our internal policies and procedures.

Customer vulnerability is relative and changeable, so their needs and abilities can change with time or circumstance, especially if the customer is faced with a particularly urgent or complex issue. Customer vulnerability can be caused by a range of factors, including mental health issues, illness, limited knowledge or awareness of products or markets, external environmental conditions or a change in personal circumstances, such as bereavement or unemployment. It must not be assumed that the presence one or more of these risk factors means an individual is automatically vulnerable in all circumstances.

At Reventus we will try to ensure that accessible design principles are applied to the standard service offered to consumers; to include the use of accessible formats or assistive technology, and will develop approaches which enable us to meet the anticipated needs of all consumers, e.g. flexible payment arrangements.

The best way to address customer vulnerability is through early intervention.

## Identifying Vulnerability

These groups may include, but are not restricted to:

**Table 1 - Factors that can cause vulnerability**

	Category	Factors causing vulnerability	Examples (not exhaustive)
A	<b>Personal and demographic, including</b>	Age	youth may be associated with inexperience; the incidence of cognitive impairment increases with age
		Gender	unable to access credit, discriminatory pricing
		Language /communication difficulties	difficulty communicating, does not speak local language as first language
		Culture and beliefs	
		Physical health	Chronic or terminal illness
		Physical impairment	reduced mobility, sight/hearing loss
		Mental health	depression, anxiety, bipolar
		Cognitive impairment	dementia, brain injury
		Addiction	alcohol, drugs or gambling
		Customers with learning difficulties	
B	<b>Situational, including</b>	Pregnant women or new parents	
		Low income	
		Financial difficulties	Or on Income Support, Job Seekers Allowance, Pension Credit, Employment Support Allowance, PIP and Universal Credit
		Homelessness	
		Domestic or financial abuse	financial abuse, family violence
		Caring responsibilities	
		Life change, or sudden change in circumstances	Recent bereavement, relationship breakdown, illness, release from prison/care or loss of employment
		External environmental conditions	natural disaster, weather event (flood, drought, lightning), fire

C	<b>Behavioural, including</b>	<b>Impulsivity</b>	<b>Not thinking before acting</b>
		<b>Higher credulity or trust</b>	<b>Believing what they are told/read on the internet</b>
		<b>Attitude to risk</b>	<b>risk averse, fear of change</b>
D	<b>Market related, including</b>	<b>Susceptibility to misleading practices</b>	<b>Too gullible</b>
		<b>Complexity of products or market</b>	<b>Unable to understand</b>
		<b>Lack of knowledge and experience of the processes</b>	
		<b>Imbalance of power between an individual and the Council/Reventus</b>	<b>Fear of repercussions in response to asking for an arrangement or submission of a complaint</b>
		<b>Victim of a personal data breach, fraud or financial abuse</b>	

Whilst not all customers in the groups above may be vulnerable, we will consider customer's individual circumstances where a potential vulnerability is identified.

### **Provision of information**

Reventus will make the following information available in readily accessible and understandable formats, free from jargon, that meet the needs of all consumers, including those in a vulnerable situation:

- a) key requirements and information, appropriately highlighted for the consumer;
- b) a clear description of the service levels that consumers can expect to receive, based on Reventus' informed understanding of consumers' expectations and priorities;
- c) the legislation under which Reventus operates
- d) payment requirements and/or arrangements;
- g) contact information and arrangements for dispute resolution.

We will take reasonable steps to ensure that consumers have received and understood the information provided and will notify consumers of changes to information previously provided.

We will implement policies to ensure that our website meets the needs of disabled people, follows the recommendations of the World Wide Web Consortium (<http://www.w3.org/standards/webdesign/accessibility>), particularly Web Content Accessibility Guidelines version 2, and will employ appropriate tonal contrast so that disabled users have access to the best advice and information available, including how to use hardware and software designed to facilitate their use.

We have implemented policies to ensure that our systems are designed in the first instance to be accessible to the broadest range of consumers and are also compatible with assistive technology.

NOTE 1 Where the nature of the service requires detailed or complex information to be provided, Reventus will consider adopting a more visual means of representation, e.g. a table of key information, a traffic light system. Ideally, information will be produced in a format that allows others to produce accessible formats. Information will be made available in text format wherever possible, in addition to other forms, to facilitate recognition and translation into speech and other languages for those who have trouble seeing, recognising or deciphering non-text information presentations. Any printed instructions will use short sentences of simple, straightforward and nontechnical language and may include simple illustrations.

Where instructions are provided in more than one language, written information in each language will be presented in separate sections and spoken information will be preceded by a clear statement in the language to be used.

NOTE 2 Particular care is taken for presentation when the information is in a digital format.

NOTE 3 Guidance on website development is taken from ISO/IEC 40500. Disabled users with a range of sensory, cognitive and dexterity impairments are, where possible, involved in the design and testing of the website. Features which can improve accessibility include:

- for blind people, text as an alternative to images for translation into audible or legible words by screen reading devices;
- for partially sighted people, large format text, images and appropriate colour contrast;
- for people with dyslexia or cognitive impairments, simpler language, alternative text formats and clear page layouts; and
- for people with manual dexterity impairments, an option to navigate sites with a keyboard rather than a mouse.

NOTE 4 This may be achieved by conformity using the applicable standards, such as ISO 9241171 on software accessibility; ISO 9241-129 on software individualization; ISO 9241-143 on forms.

## **Practice**

The appropriate use of discretion is core to how our Enforcement Agents, Staff and Welfare Support Team will approach any given situation and will use his or her experience to handle members of the public with due care and consideration.

We will notify the customer where we intend to share the details of their Vulnerability with our Client, or appropriate agencies (See our GDPR policy and procedure) and get their prior permission to speak to anyone who they may nominate to act on their behalf.

Our Enforcement Agents, Staff and Welfare Support Team will contact the client and report the circumstances in situations where there is potential cause for concern. Where necessary, our Enforcement Agents or Staff will advise the client if further action is appropriate and seek evidence from the customer where appropriate.

In some cases, our Clients will inform Reventus that they feel that the debtor is vulnerable. Where we are aware that a person may be vulnerable, we will flag the case and adapt our debt recovery and collection procedure accordingly to minimise any hardship or distress and this may be put in place at any point in the recovery cycle.

The exercise of appropriate discretion is needed, not only to protect the debtor, but also the Enforcement/Collection Agent or our Welfare Support Team who have been trained to avoid taking action which could lead to accusations of inappropriate behaviour.

Our Enforcement Agent/Collection Agents will withdraw from domestic premises if the only person present is, or appears to be, under the age of 18; they will ask when the debtor will be home if appropriate. Our Enforcement/Collection Agents will also withdraw from making enquiries at any address if the only persons present are children who appear to be under the age of 12.

Wherever possible, the Enforcement Agents, Staff and Welfare Support Team will have arrangements in place for accessing translation services when these are needed and provide as required the information provided in different formats as appropriate to the individual's needs.

We recognise that certain debt recovery options are not appropriate where a customer is identified as vulnerable, and we will act to personalise and tailor the action we take to reflect this.

### **Factors to be considered when identifying Vulnerability**

Reventus recognises that when identifying vulnerability there are certain factors to be taken into account, some of which may not be obvious, and we will make best efforts to identify the presence of any factors that could affect a consumer's access to the organization's services. For example:

**Table 2 — Factors of vulnerability**

	<b>Category</b>	<b>Factors of vulnerability</b>	<b>Examples (not exhaustive)</b>
A	<b>Personal and demographic, including</b>	Age	youth may be associated with inexperience, the incidence of cognitive impairment increases with age
		Gender	May feel threatened

		Language	difficulty communicating, does not speak English as first language
		Culture and beliefs	May not allow a wife to deal with affairs
		Physical health	Chronic/ terminal illness,
		Physical impairment	reduced mobility, sight/hearing loss
		Mental health	depression, anxiety, bipolar
		Cognitive impairment	dementia, brain injury
		Addiction	alcohol, drugs or gambling
B	<b>Situational</b> , including	Low income	
		Financial difficulties	
		Homelessness	
		Domestic or financial abuse	financial abuse, family violence
		Caring responsibilities	
		Life change, or sudden change in circumstances	bereavement, relationship breakdown, illness, release from prison/care or loss of employment
		External environmental conditions	natural disaster, weather event (flood, drought, lightning), fire
C	<b>Behavioural</b> , including	Impulsivity	
		Higher credulity or trust	
		Attitude to risk	risk averse, fear of change
D	<b>Market related, including</b>	Susceptibility to marketing practices	getting into debt
		Lack of knowledge and experience of the market	

		Imbalance of power between an individual and an organisation	fear of repercussions in response to submission of complaint in tenancy arrangements etc.
		Victim of a personal data breach, fraud or financial abuse	
E	<b>Access, including</b>	Physical and geographical access	wheelchair user, rural or isolated location
		Limited technological capability, knowledge and/or skills	no access to smart technology, mobile phone, internet or computer
		Difficulty accessing information	dyslexia, limited financial capability, knowledge, literacy or numeracy skills

## **Identifying the needs of individual consumers**

Reventus will make best efforts to identify the presence of any factors that could affect a consumer's access/use to/of our services.

Staff are aware that the presence of any of these factors does not automatically make someone vulnerable in any or all circumstances and that consumers may have more than one factor or vulnerability.

Reventus has trained staff to understand how best to identify the needs of individual consumers. This may include:

- a) referring to notes or references concerning the customer's needs (and adding to those notes when appropriate)
- b) engaging consumers in conversation and asking open, non-intrusive, questions to encourage disclosure of information;
- c) checking that the consumer understands and can act on the information provided, especially where the consumer has an urgent and/or complex problem;
- d) setting manager's respective responsibilities in relation to vulnerable consumers, or referring to the Welfare Support team,
- e) determining whether the consumer has any particular requirements or preferences for communicating with Reventus;
- f) establishing whether the consumer has any particular requirements in accessing the services;
- f) determining whether the consumer has particular requirements in terms of how services are provided;

**NOTE** Staff may, for example, ask such questions as, “Would you like to discuss how to pay your bill?”, “Do you have any specific requirements?”, “How can we help you with that?” or “How can we make that easier for you?”.

Reventus will provide information to customers on the options they have to make payments, including through post offices, or offer cash payments for those who have difficulty using on-line payment methods.

## Triggers

For risk factors that are not immediately obvious and cannot be easily identified, staff shall be encouraged to use triggers to help them identify signs of vulnerability in consumers.

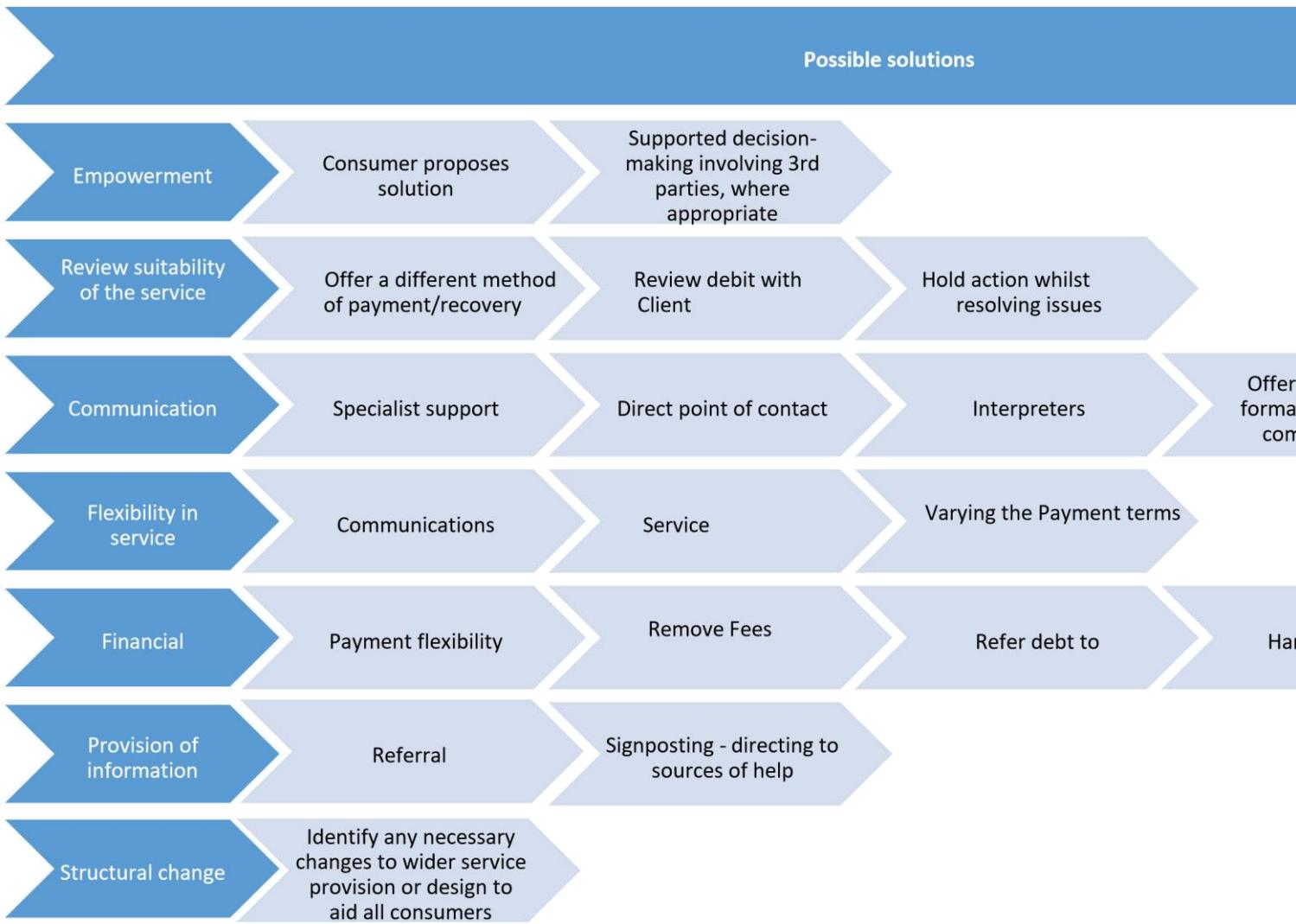
(Triggers are signs that customers might be having some kind of difficulty and need assistance. They might, for example, be things that the customer says or does)

### Examples of triggers:

Table 3 - Triggers		Possible causes
A	Customer does not respond to emails or phone calls	Lack of access to internet Lack of confidence with telephone interactions
B	Consumer does not show up to appointment	Sudden change of circumstance Physical access
C	Consumer does not read electronic communications	Increased credulity Reduced ability to process complex information
D	Payments stop suddenly Customer does not pay bill	Loss of employment Sudden change of circumstance
E	“I can’t hold on all day”	Running out of phone credit Financial difficulties Caring responsibilities
F	“This bill doesn’t make any sense” “I can’t understand this letter you have sent me”	Difficulty processing information

## Developing and applying solutions to respond to consumers in vulnerable situations

Once our staff have identified a consumer who could be in a vulnerable situation, they will try to use a solution-led approach to establish the cause of the problem and to offer relevant help and assistance. Reventus will, where possible, seek to empower the consumer to identify solutions.



Reventus will consider the suitability of the spectrum of solutions set out below: Empowerment, Review Suitability of the proposals, Communication, Flexibility in Service, Financial, Provision of Information:

**NOTE 1** Table 2 sets out examples of the types of solution that are available to the organisation. More than one solution is often relevant for an individual consumer and often the consumer can identify the simplest solution.

**NOTE 2** Table 4 sets out examples for how staff can apply solutions for individual consumers and demonstrates how the solution spectrum in Figure 2 can be applied in example scenarios.

## Possible solutions

**Table 4**

## Applying possible solutions

**Table 5**

	<b>Triggers</b>	<b>Possible causes</b>	<b>Possible solutions</b>
<b>A</b>	Consumer does not respond to emails or phone calls	Lack of access to internet Lack of confidence with telephone interactions	<i>Communication &amp; Empowerment:</i> Offer alternative methods of communication Ask how Reventus can help
<b>B</b>	Consumer does not show up to appointment	Sudden change of circumstance Physical access	<i>Communication &amp; Empowerment:</i> Offer alternative methods of communication Ask how Reventus can help
<b>C</b>	Consumer does not read electronic communications	Increased credulity Reduced ability to process complex information	<i>Communication &amp; Flexibility in Service:</i> Key information set out in plain language and in highly visible formats for all consumers Read out key information Check for understanding Offer more time to consider information
<b>D</b>	Payments stop suddenly Customer does not pay bill	Loss of employment Sudden change of circumstance	<i>Financial &amp; Empowerment:</i> Ask how Reventus can help Reduce payments for a short period Provide a payment holiday Arrange a more flexible repayment schedule Explain alternative methods of payment
<b>E</b>	“I can’t hold on all day”	Running out of phone credit Financial difficulties Caring responsibilities	<i>Provision of information &amp; Communication</i> Offer alternative methods of communication/ phone back Ask how Reventus can help Provide information about any financial assistance available
<b>F</b>	“This bill doesn’t make any sense” “I can’t understand this letter you have sent me”	Difficulty processing information	<i>Provision of information &amp; Communication</i> Offer alternative methods of communication/ phone back Ask how Reventus can help Provide information about any financial assistance available

## Practical steps to implement inclusive service

**Table 6**

A. Make the case for change Change must be driven from the top	<ul style="list-style-type: none"><li>• This may be a social and/or business case for change within Reventus, with commitment for the required resources</li><li>• Based on a shared understanding of the guiding principles</li><li>• Educate management and key personnel to raise awareness of the benefits to Reventus of identifying and responding to Customers in a vulnerable situation</li></ul>
B. Review	<ul style="list-style-type: none"><li>• Existing IT and management systems</li><li>• Existing policies and procedures</li><li>• The factors of vulnerabilities experienced by customers</li><li>• Issues experienced by customers of Reventus</li><li>• Range of services offered</li></ul>
Do Gap analysis	<ul style="list-style-type: none"><li>• Identify where improvements could be made to Improve performance</li><li>• Prioritise areas for action if appropriate</li></ul>
D. Design / redesign	<ul style="list-style-type: none"><li>• Policies, procedures, systems, services</li><li>• Engage with customers and Clients to ensure that the design takes account of need</li></ul>
E. Implement	<ul style="list-style-type: none"><li>• Implement the necessary changes or improvements</li><li>• Roll-out staff training</li></ul>
F. Data collection	<ul style="list-style-type: none"><li>• To inform review, evaluation and continuous improvement</li><li>• Focus particularly on consumer feedback</li></ul>
G. Review, evaluate, improve	<ul style="list-style-type: none"><li>• To embed a continuous improvement approach</li><li>• Review progress regularly and in response to consumer feedback</li><li>• Recommence the process for future improvements</li></ul>

## **Make the case for change**

Reventus will ensure that the senior management and staff understand the reasons for change, including having a shared understanding of the guiding principles. Management commits to adequately resourcing and implementing flexible and inclusive needs and to respond to the vulnerability of customers.

## **Review existing systems**

### **Conduct review of systems, policies and procedures**

Reventus takes appropriate measures to understand and review the impact of its policies and procedures, including its current customer service arrangements, which includes, where appropriate:

- a) understanding the factors that can place customers at a disadvantage, both in terms of services supplied and the organisation's interaction with its customers;
- b) researching and applying best practice in dealing with customers' specific needs;
- c) identifying relevant statutory and regulatory requirements;
- d) ongoing consultation and engagement with customers, or organisations representing their interests, in the development of and/or changes to service;
- e) testing or trialling services with end users/Clients for accessibility and usability to identify any unplanned or unintended impacts on specific groups of customers; f) training and supporting frontline staff so that they can identify and respond to customers who have specific needs;
- g) ensuring systems and procedures are sufficiently flexible that people who are in difficult circumstances are not disadvantaged;
- h) conducting regular audits of customer processes and communications to ensure that practices are appropriate to meet customers' needs, inviting customer feedback, and ensuring that there are clear procedures for registering complaints, analysing their causes and suggesting improvements to service provision;
- i) identifying problems in the service provided and implementing improvements; and
- j) reviewing all customer-facing systems and methods of delivering information to determine if there are any accessibility issues which could have a negative impact on consumers.

### **Services primarily targeted at consumers in a vulnerable situation**

Reventus will come across vulnerable/disadvantaged people in the course of its work, so we need to gather sufficient information to:

- a) understand the characteristics of these ranges of customers; and
- b) identify the specific service needs of these groups.

## **Conduct gap analysis**

Reventus conducts a periodic gap analysis to assess the extent to which its current systems, policies and procedures fully reflect the aims and objectives associated with achieving best

practice. The process is used to identify the areas for improvement for the organisation and to prioritize actions. This analysis assesses the extent to which Reventus offers an inclusive and accessible service, and the extent to which the specific needs of our customers who are in a vulnerable situation are met, ensuring that they:

- a) are not disadvantaged by policies which discriminate against some groups or which fail to take account of customers' circumstances;
- b) are able to receive fully the planned level of customer service when dealing with Reventus and its staff;
- c) receive guidance as to what they have a right to expect from Reventus and are signposted to third party organisations that may be able to assist them;
- d) have access to information presented in inclusive ways that takes account of literacy, cognitive impairment and language difficulties and is available in non-web-based forms, as well as electronically, such that it is compatible with mainstream technology and assistive technology (see ISO/IEC 24752);
- e) are able to obtain, understand and act on the information provided;
- f) are, where possible, able to contact the organization easily, with all of the customers' requirements being satisfactorily addressed on the initial contact; and Where this is not possible, Reventus will arrange for the customer to be contacted again, checking how and when this can be done.
- g) have easy access to complaint-handling processes and can seek redress and obtain appropriate remedies where necessary.

### **Design or redesign of systems, policies and procedures**

Reventus has developed approaches which enable it to meet the anticipated needs of all consumers, e.g. flexible payment arrangements/methods. We have also put in place alternative arrangements to meet any specific needs for consumers in a vulnerable situation that have not previously been identified.

Reventus has procedures for deploying alternative approaches which includes guidance for staff on how alternative options can be arranged, including any Management/Client authorisation required and how to respond to requests for specific variations from individual customers. Staff given appropriate authority to resolve issues themselves as much as possible within company guidelines.

Reventus utilises artificial intelligence (e.g. automated decision-making) and has documented and audited these systems and processes for bias and discrimination; and have instigated failsafe's where any issues have been identified (i.e. not progressing action when an investigation into vulnerability is underway (hold) or where vulnerability has been identified (hold & regular reviews)

Reventus has effective and efficient ongoing processes (monitored through our ISO 9001: 2015 processes and audits) for identifying and then managing the needs of consumers who may be considered vulnerable within the context of the services being provided.

## **Resources**

Reventus has sufficient resources available for the effective identification and assistance of those considered vulnerable; both existing and potential customers whose circumstances might have changed. This may involve one or more of the following:

- a) Reventus provides consumer-facing staff with adequate training to recognise signs of vulnerability and deal with them appropriately;
- b) Reventus reviews and changes where necessary, existing processes and obtains, appropriate feedback from Clients/Customers;
- c) Reventus will employ specialised or additional trained staff to deal with customers requiring specific assistance;
- d) Reventus has introduced a positive policy for working with customers' chosen advisers or intermediaries;
- e) Reventus has set aside specific resources to enable us to provide information in accessible formats;
- f) Reventus is continually working to provide comprehensive help/assistance that provides easy-to-use, context-sensitive information and accessibility features on its website, to promote ease of use and navigation.

## **Competence**

**Reventus ensures, through training and monitoring, that staff possess sufficient:**

- a) knowledge of best practice for the provision of inclusive service so that they are able to meet the needs of all consumers, regardless of their personal circumstances or access requirements; and
- b) knowledge and skills necessary for them to fulfil legislative requirements in relation to vulnerable consumers.

## **Communication and engagement**

Reventus constantly seeks to ensure that all paths for communication take account of the needs of vulnerable customers, and that there is active engagement with those customers.

Customers are at all stages of service delivery given a choice of options to contact and communicate with Reventus so that they are not put at a disadvantage.

For example, by telephone, post or internet, or in person (face-to-face) where practicable, depending on their preferences and personal circumstances.

Information obtained is limited to the relevant and needed information and obtaining unnecessary information is avoided.

Reventus' telephone systems do not utilise, complex paths with multiple choices to reach the right help.

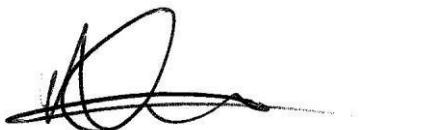
## Awareness

Reventus ensures, through training and monitoring, that all managers and relevant staff are aware of how they should treat customers and to raise any instances where improvements are required to ensure delivery of inclusive services, particularly to consumers at greater risk of vulnerability.

## Our Principles

When dealing with vulnerable customers we will adopt key principles that all our personnel will adhere to:

- All our staff will receive training to allow them to identify potential customer vulnerability, understanding that not all vulnerabilities are obvious. (see above)
- We will maintain and publish a specific complaint procedure for customers unhappy with the conduct of enforcement agents.
- We provide a local-rate telephone line to our Welfare Support Team
- We will work with advice agencies to agree repayment schedules that are affordable and recognise a customer's priority debts.
- We will ensure our staff have undertaken training in supporting vulnerable customers
- We will signpost and publicise debt advice contact details with our literature.
- We will encourage customers to contact us if they are experiencing financial hardship.
- We will encourage customers to seek support from Agencies that provide free advice, family and friends.
- We will remove fees from cases where vulnerability has been established.
- We may ask customers experiencing financial hardship to complete personal budget sheets, to enable us to agree fully informed repayment schedules that are affordable to the customer, and in the best interest of the Client.
- If we do not accept a repayment arrangement, we will fully explain why.
- We will not make assumptions about the degree of knowledge or understanding that a debtor has of the enforcement process. We will explain what we will do and what will happen next.
- We will ensure that when leaving the person, they are reassured and not left in a more vulnerable position.



Anthony Quinn  
Date