

# **Vulnerable Customers Policy**

At Tilia Homes, we are committed to treating all our customers with fairness, respect, and empathy. This policy aims to provide guidance to our people (employees) on how to effectively identify and support vulnerable customers with the necessary care, attention and respect that all our customers deserve. We recognise that vulnerability can affect individuals in various ways, and it is our duty to ensure their needs are met throughout their interactions with our company. Training is available and provided to support this.

## Definition of Vulnerability:

Vulnerability is defined as someone who is susceptible to harm due to personal circumstances. This can be temporary or permanent and may be triggered by factors such as health, resilience, capability, and life events. It is important to approach vulnerability with sensitivity and understanding, acknowledging that each customer's situation is unique.

### Identifying Vulnerable Customers:

Our people should be aware of the signs that may indicate a customer's vulnerability in buying a new home. These signs include but are not limited to:

- Physical or mental health issues
- Financial difficulties i.e. low income and/or debt
- Severe or long-term illness
- Caring responsibilities
- Language barriers
- Age-related challenges i.e. being older / old may be associated with cognitive or dexterity impairment, hearing or sight loss etc and being young may be associated with lack of experience.
- Recent bereavement or traumatic events

Living with a disability, illness or diagnosis does not necessarily make someone vulnerable. If a customer does not advise us of a vulnerability, but it becomes apparent that they may be, we must seek confirmation from the customer or their representative. This may become clear during a telephone conversation or meeting. For example:

- Can the customer hear everything you are saying? Do they ask you to slow down, speak louder or repeat what you have just said?
- Does the customer seem distracted or confused? Do they follow everything that you have said? Are their questions relevant to your discussion? Have they retained the information provided to them?
- Is the customer coherent and fluent in your spoken language?

### Communication and Support:

It is important that our people do not make assumptions about the degree of knowledge that a customer has, nor offend or discriminate against the customer when asking about vulnerabilities. As a guide, our people should:

- Maintain a compassionate and non-judgmental approach when interacting with vulnerable customers, ensuring their dignity and privacy are respected.
- Actively listen to customers' concerns, allowing them to express themselves fully and arrive at their own decisions.
- Include questions as frequently as possible to allow the customer to demonstrate their understanding.



- Use plain language, avoid jargon, and provide information in a clear and concise manner.
- Strive to respond promptly to vulnerable customers' queries and concerns, providing them with the necessary support and reassurance.

#### **Processes and Procedures:**

If a customer has been identified as being vulnerable, any information gathered will be processed in line with the GDPR (general data protection regulation).

Our people will ensure details of the vulnerability are added to the customer record, together with an acknowledgement that explicit consent has been obtained by the customer to enable us to process the details of their vulnerability accordingly. Customers will also be fully informed of how we will process this information, which will be regularly reviewed for relevance.

Our communication methods include post, email, face-to-face, and telephone, ensuring accessibility for all customers. We provide clear and jargon-free information and allow time for customers to consult with third parties. We prioritise customer understanding, and if needed, provide support through follow-up appointments.

In the event that we believe that a vulnerable customer is unable to make a decision for themselves, we will attempt to identify a carer or next of kin who is authorised to act on their behalf.

#### **Review and Improvement:**

This policy will be reviewed on an annual basis to ensure its effectiveness and relevance. Feedback from our people and customers will be sought to identify areas for improvement. Any necessary updates or changes to the policy will be communicated to everyone at Tilia Homes.

By following this policy, we aim to create a culture of understanding and support for vulnerable customers. Together, we can make a positive difference in their lives and provide them with the exceptional customer service they deserve.