

Vulnerability Policy – Telephony Services

This document sets out Utility Warehouse’s policy for meeting the needs of vulnerable members, and members with disabilities who take telephony services (Home Phone, Broadband or Mobile) from us.

Introduction:

At Utility Warehouse, we recognise that all members are different, with a wide range of needs, abilities and personal circumstances. Our focus is to ensure we provide a fair, flexible, and inclusive service which is appropriate to the needs of the member, irrespective of their particular situation; making it easier for all members to obtain information, access a service, or seek an effective resolution if something goes wrong. We understand that vulnerability may be caused by a range of unique factors and that vulnerability is a situation or characteristic and not a trait. Our approach is to identify and record factors that may lead to a member being in a vulnerable situation and offer a tailored service based on individual requirements.

Utility Warehouse uses the following definition: “a member may be in a vulnerable situation due to circumstances of age, physical or learning disability, physical or mental illness, low literacy, communication difficulties or changes in circumstances such as bereavement”.

Policy objectives:

1. Provide practices for ensuring the fair and appropriate treatment of vulnerable members.
2. Outline reasonable steps that will be taken to identify vulnerable members.
3. Describe how information about vulnerable members’ needs will be recorded.
4. Explain how staff will be made aware of, and trained, to act in accordance with the policies.
5. State how the impact and effectiveness of the policies and procedures will be monitored and evaluated.

Key principles - Our approach is supported by these principles:

- ✔ We act on the broad principle to take appropriate steps to consider the needs of any person who is in a vulnerable situation and therefore needs appropriate adjustments to how we communicate with them; support them; make decisions about their account; record their circumstances.
- ✔ We understand that vulnerability is a situation or characteristic and not a trait.
- ✔ We recognise that people are different, meaning that some individuals could be vulnerable in circumstances where others might not be.
- ✔ We believe that the welfare of any vulnerable person should be considered above all else.
- ✔ We recognise that in special circumstances it may be necessary to adopt an individually tailored approach that may mean stepping outside of our normal process.
- ✔ We have clear processes and solutions available to vulnerable persons so we can give the best support possible.
- ✔ We consider any complaint related to the treatment of a vulnerable person with the utmost seriousness and priority.
- ✔ We believe care and transparency are key to building and maintaining trust with vulnerable persons and we will demonstrate this through our actions, behaviour and outcomes.

Identifying vulnerability:

Members can let us know about any personal circumstances or characteristics that may lead them to be in a vulnerable situation:

- ✔ Call us 0333 777 0 777. We're open Monday to Friday 9am - 5:30pm, and Saturday 9am - 4:30pm.
- ✔ Email us - click [here](#) to go to our webform.
- ✔ If you're hearing or speech impaired, you can call our Textphone on 0333 003 5 643 or email deafmemberservices@utilitywarehouse.co.uk
- ✔ Write to us at: Member Services, Utility Warehouse, Network HQ, 508 Edgware Road, London, NW9 5AB

Each customer service adviser has been trained to identify the circumstances or characteristics that may lead to a vulnerable situation; the following list provides factors that may be used to identify and record vulnerability:

1. **Disability:** the member, or a permanent member of the household, is disabled (including learning disabilities). For example, they have been identified as a person within the scope of the Chronically Sick and Disabled Persons Act 1970.
2. **Age:** the member is of pensionable age.
3. **Capacity:** the member is learning disabled, has speech impairments, a low level of literacy, or does not speak English fluently.
4. **Chronic illness:** the member, or a permanent member of the household, suffers from long term ill-health (including mental ill-health).
5. **Circumstantial:** the member has had a temporary change in circumstances which means that they are less likely to be able to access our services or be at risk of significant detriment. Such a change to circumstances may include bereavement, pregnancy or personal injury.
6. **Landline dependency:** the member has a telecare system (lifeline alarm or similar); they use a textphone (text relay) on a fixed line; they are signed up to network controlled calling and/or 123 or 118 barring (or similar). Or they identify as having a disability or accessibility requirement that would indicate they are more reliant on their landline requiring a priority fault repair. Or they have a VOIP service with no back up if there is a power or network failure.

Each customer service adviser has been trained to recognise that members may find it difficult to disclose intimate details of personal circumstances or characteristics and to handle such situations with sensitivity, respect, and tact.

Recording vulnerability:

A record of a member's needs will be recorded to their account as well as the inclusive services discussed or provided. Before making such a record we will gain the member's consent and ensure they know what we are recording and why. As a broad principle, we seek to hold the least amount of personal information that allows us to offer an inclusive service. For more on how we look after a member's personal information please read our [privacy policy](#).

Staff training:

All relevant customer service and back office staff undergo an initial vulnerability training course. They will also have annual refresher training on vulnerability. Ongoing training, if required, can be identified through coaching and the quality assurance measures that we have in place. All relevant new members of staff will receive the vulnerability training as part of their induction training.

Inclusive and accessible services:

Text relay:

Text Relay is a three-way call involving a hearing or speech impaired person, a hearing person and an operator. The operator voices what the hearing or speech impaired person types to the hearing person and the operator types what the hearing person says to the hearing or speech impaired person. The member will need to dial one of these codes into their phone or textphone:

1. For a text-to-text or text-to-voice call - dial 18001 then the full telephone number.
2. For a voice-to-text call - dial 18002 then the full telephone number.
3. To call the emergency services from a text phone - dial 18000 (they don't need to dial 999).
4. There is no charge for a member using this service on their home phone to call other landlines.

Hearing or speech impaired members can contact our Member Service department via text relay. Our customer service staff have been trained to work with text relay operatives. Alternatively, members can call our textphone service on 0333 003 5 643 or email deafmemberservices@utilitywarehouse.co.uk.

Next Generation Text Service:

Hearing or speech impaired members can also use the Next Generation Text Service. This works similarly to Text Relay but, instead of using a textphone, an app allows them to use a smartphone, tablet, or computer to make a phone call. For more information click [here](#). If a member is using the next generation text service application on their mobile, any data that's used over our network will come out of their allowance, if they're using wi-fi there wouldn't be a charge.

Free 195 directory enquiries:

If a member isn't able to hold or read their phone because of sight loss or other disability, they can sign up for a free directory enquiries service. It doesn't matter what phone provider they're with. To sign up for this service, call 0800 587 0195 to ask for an application form. As well as filling in the details on the form, you'll need to have it countersigned by someone like a doctor, nurse or other medical practitioner who knows them before sending it off. Once you've signed up to the service, you can dial 195 from their phone, and speak to an operator who'll find the number they need.

Mobile SMS access to the emergency services:

Hearing and speech impaired members can get in contact with the emergency services by sending a text message (SMS) on a mobile phone to 999 or 112. The message will be passed to the police, ambulance service, fire rescue, or coastguard who will be able to reply. To register text 'register' to 999, you will get a reply then follow the instructions you are sent.

Visual impairment:

Visually impaired members can request written communications, including bills, in Braille or large print format. We can also provide bills in an audio format. These bills are read out loud and recorded onto CD. Please contact us to request bills or other written communication in an alternative format.

Third party bill management:

Members can add an authorised third party to their account. Authorised third parties have the same level of account access as members and are able to provide members with help to manage bills, including:

1. Sending the bill to an alternative address (e.g. the authorised third party's)
2. Paying the bill on the member's behalf.
3. Enquiring about any aspect of the bill including why it may not be paid.

Authorised third parties are not liable for any aspect of the account including paying the member's bill. Please contact us to add an authorised third party to an account.

Priority fault repair:

Priority fault repair is a free service for members who rely on their Home Phone service (landline) for health and mobility reasons where a fault has led to total loss of service. If you're eligible, you'll get priority when you report such a fault to us. To ensure that this level of service is being delivered to those who really need it, we require them to meet certain criteria. To find out more, please contact us.

Complaints:

Our complaints handling procedure is readily accessible to all members, and can be provided in a number of alternative formats, such as large print or braille, to ensure that members with disabilities are able to lodge and progress a complaint with ease.

Policy effectiveness:

General Condition C5.3 requires "how the impact and effectiveness of the policies and procedures are monitored and evaluated".

Operational compliance is principally overseen by our in-house Compliance and Process team. They act as internal vulnerability champions, ensuring that Utility Warehouse is effective in meeting the needs of vulnerable members. One way that we assess the impact of our vulnerability policy is by periodically reviewing a sample of cases where vulnerable members have complained. The Compliance and Process team will use these instances to evaluate the factors that lead to dissatisfaction and to understand if our services, support, and procedures are accessible and effective. They report their findings to senior management at regular management information review meetings.

Furthermore, the Compliance and Process team will use a range of information, including listening to a selection of member calls, to evaluate if customer services advisers have adhered to procedure and offered outcomes based on need. Feedback is provided to advisers' team leaders via feedback workflow, who must demonstrate that they have provided additional coaching and support. Again, the Compliance and Process team collate this data into a report and provide their findings to senior management at regular management information review meetings.