

IDENTIFYING VULNERABLE CONSUMERS

Independent Network members should try to identify consumers who are vulnerable or potentially vulnerable, and deal with them sympathetically and appropriately. Vulnerable consumers are those who may be at risk of making an incorrect or inappropriate decision, or who may be at risk of receiving unsuitable or unnecessary goods or services.

Independent Members must take the necessary time and effort to ensure that vulnerable consumers are provided with the best possible service and give them extra care and support when required. Selling in the home is common in our industry, so it is very important that vulnerable consumers understand all aspects of signing a contract for goods and services, including the financial implications.

Where appropriate, the member should recommend the assistance of a family member, trusted friend or neighbour to assist the consumer before a contract is signed.

Independent Network Members must:-

- Identify consumers who may be vulnerable
- Give extra support in helping them make informed choices
- Ensure that vulnerable consumers understand important documents such as the quotation, the contract/ guarantee and our Insurance Backed Guarantee
- A consumer may be vulnerable for any reason that makes it more difficult for them to fully understand the information they need in order to make an informed decision about your company's products and service.

Vulnerable consumers may include:

- Physical disabilities or health problems.
- Elderly Person
- Poor literacy or numeracy skills.
- Who are purchasing something at a time of particular stress, distress or personal issues
- Whose first language is not English, and English is the only language in which sales material is available

Guided by the above, Independent Network Members should try to identify in a sensitive manner, whether a consumer is vulnerable or potentially vulnerable. Reasonable adjustments are to be made to accommodate them so they can fully understand the information they need in order to make an informed decision about your company's products and service.

Sales visits will need to be re-scheduled if the Sales Representative feels the consumer is vulnerable (which was not identified before the visit) and would like assistance of a family member, trusted friend or neighbour to attend the sales visit.



TRAINING

All Independent Network members must ensure that their employees and Sales Representatives who are dealing with potential consumers have been trained in how to identify and deal with consumers who are vulnerable or potentially vulnerable.

They must be trained to carefully consider that a consumer's vulnerability may not always be obvious (e.g. sight impairment, physical or mental disability, age-related vulnerability, vulnerable due to a recent tragic event - such as bereavement).

The Mental Capacity Act 2005 Code of Practice is a useful reference document for Independent Network members.

RESPONSIBILITIES TO VULNERABLE OR POTENTIALLY VULNERABLE CONSUMERS

For any vulnerability which relates to physical or mental disabilities, the Independent Network Member must consider the effect of the disability on the consumer's capacity to make an informed decision on whether the products on offer are affordable and suitable for them.

Independent Network Members must provide the consumer with details of each stage of the transaction so that an informed decision can be made. This can involve reading the contract terms and conditions to the consumer, explaining clearly their rights to cancel, and explaining deposit and payment terms.

Independent Network members' employees and Sales Representatives' must be trained to take their obligations with regard to vulnerable consumers seriously, and ensure that suitable arrangements are made in order that the consumer is provided with the best guidance and advice suitable for their needs.

SUITABLE PRODUCTS FIT FOR PURPOSE

Independent Network members must ensure that their salespersons and surveyors provide the vulnerable consumers with products that are fit for purpose in respect of their disability.

Examples would be:-

An elderly person with poor reach should have window styles recommended where the window openers are within reach wherever possible, especially where a window is over a kitchen sink.

The threshold height of an external door should not pose a trip hazard to a person affected by poor mobility.

SALES ACTIVITY

All Independent Network Members must follow Data Protection Laws with regards to the retention of consumer data and should consider consumers that may be vulnerable to cold calling approaches, digital marketing etc., should not be contacted for potential new enquiries.