

## Your response

Question	Your response
<p><b>Question 1: Do you agree with the proposed revisions to our guide? Please provide your views with supporting evidence.</b></p>	<p>Yes. Telecoms and broadband organisations are not doing enough to identify customers who may be vulnerable.</p> <p>Financial vulnerability is particularly difficult to identify and manage as it potentially covers a range of different scenarios where customers may experience difficulties to pay on a temporary or more permanent basis. Capita would argue that the best way to address the needs of financially vulnerable customers is to not only have robust and clear processes that make sure that all customers are treated in a fair and transparent manner and where available payment support options are flagged to customers as early as possible. However use supporting technologies such as Data and AI tooling to classify customers in a 'Vulnerability Index' and also offer toolings such as AI enabled 'Assisted Customer Conversations' that can help the agent in treating the customers with empathy and ease in their calls with agents. Also there is a need to facilitate communications via the customers preferred channel of communication. Email/ SMS/ Web Chat/ Conversational AI or Self Service. Agents need specialised training in Empathetic Collections.</p> <p>It is important that Ofcom's guidance sets a realistic but clear expectation on the customer that they too have a key responsibility to engage with their provider to be able to avail themselves of the payment support and offer assistance. I would recommend promoting discussion within the Telecoms and broadband community and participation in a virtual roundtable that Capita are hosting with Stepchange and Total Telecoms – see <a href="https://bit.ly/3j2IRF2">https://bit.ly/3j2IRF2</a></p> <p>Useful background content to share with your community on the topic</p> <p>1)Six tips for empathic collections <a href="https://www.capita.com/our-thinking/leadership-kindness-six-empathic-tactics-telecoms-collections-teams">https://www.capita.com/our-thinking/leadership-kindness-six-empathic-tactics-telecoms-collections-teams</a></p>

2) Telecoms and Media Advisory 10 principles of addressing customer vulnerability for call centre employees

<https://www.cap-ita.com/sites/g/files/nginej291/files/2022-04/Telecoms%20and%20Media%20-%2010%20principles%20of%20addressing%20customer%20vulnerability%20%E2%80%93%20V2%20GS28032022.pdf>

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