



# **Vodafone response to Ofcom’s consultation ‘Treating vulnerable customers fairly’.**

## **1. Summary**

Vodafone UK (‘Vodafone’) welcomes the opportunity to respond to Ofcom’s Consultation on vulnerable customers. We agree with Ofcom on the importance of all customers, especially our vulnerable customers, being treated fairly.

We acknowledge the complexity of translating the needs of vulnerable customers into policies and processes, and very much welcome the sharing of best practices in this area, both within and outside our own industry. To this end, Vodafone and the other main telecoms providers have initiated a monthly Vulnerability Forum, chaired by the Communications Consumer Panel. This Forum is a valuable source of information where companies and industries share their experiences, policies, and issues regarding vulnerable customers are openly and constructively discussed.

Whilst we welcome the best practice in the Guide, and the suggestions put forward in it, we question the way Ofcom will use the Guide. Ofcom sets out that in assessing whether a provider is meeting its obligations, they would take into account whether a provider has adopted any of the measures mentioned in the Guide. This appears to go beyond a Guide and best practice, and could be seen as introducing regulatory requirements in the form of the Guide. We consider Ofcom should be clear about the status of the Guide. Is it a best practice Guide and will it be used as such, or is it the basis of a regulation that, in order to be compliant, providers have to follow?

Below we provide our detailed comments on the proposed Guide.

## **2. Establishing and publishing policies**

### **Proactive senior level engagement**

We agree that it is important that fairness for vulnerable customers is embedded in a company’s culture. Vodafone has a vulnerability champion at senior level to set the tone of our culture from the top. Whilst it is important to have a champion at this level,



every employee needs to consider vulnerability on a daily basis whether they respond to customers' queries or are involved in product, or in process design.

Whilst having one champion at senior level works for Vodafone, we consider that the governance and management of vulnerability should fit an organisation's existing structure and processes. Therefore, the decision to have a single sponsor, a vulnerability board or a different governance mechanism should be left to the organisation.

## Taking an inclusive approach to who is potentially vulnerable

As described in the consultation, vulnerability can have many different 'faces' and it is important to ensure that our employees, in particular our frontline advisors, are aware of them. The training material we developed to create awareness of vulnerability reflects this and has been developed with the input from mental health related charities. It includes case studies of different types of vulnerabilities, and it provides advisors with symptoms. The non-exhaustive list in our training material includes a wide range of vulnerabilities:

- relationship separation/ split;
- recently bereaved;
- difficulty in reading or writing (or both);
- the elderly/ the young;
- disabilities (physical, visual, hearing);
- illness ( short term, long term);
- change in financial circumstances (decrease in income or an increase in outgoings e.g. one income into the household when previously there were two, working less hours, change in benefits, unexpected bill, household bills increase significantly, behind with payments on priority debts/ bills);
- mental health condition (dementia, anxiety, depression, stress, low mood, suicide, self-harm, mania, bipolar, psychosis);
- intellectual disability (learning disability);
- caring responsibilities (focus on the person they are caring for, less time for themselves including ability to work, impact of their income, lack emotional support for themselves);



- traumatic life event ( incident/ accident involved self, partner or family member);
- change in personal circumstances (relocate, pregnancy, diagnosis of condition);
- suffered domestic abuse; and
- English as a second language.

As part of the training material, and to make the implications of vulnerability more visible, we developed a video of someone with cerebral palsy. In this, she explains the importance of looking for the ability in disability and reiterates that Vodafone's Vulnerable Customer mantra of caring, listening, and supporting embodies how customers who are vulnerable should be treated. The training material also sets out that everybody can, and most people do, experience vulnerability at some point in their life. We consider it is important to create this wide awareness of vulnerabilities and to provide advisors with guidance on how to identify vulnerabilities. At the same time, we acknowledge it can be hard to identify certain vulnerabilities, in particular where advisors engage with customers over the phone, and are unable to see customers' facial expressions.

## Publishing policies on treating vulnerable consumers fairly

As part of the updated General Condition, we updated the relevant part of our website, and developed a policy for vulnerable customers. Customers can contact us in different ways, according to their needs and preferences and whilst all our advisors (and indeed all employees are trained in vulnerability) we have a dedicated team that can deal with detailed questions in relation to accessibility.

## 3. Treating vulnerable consumers fairly

### Identifying vulnerable consumers

The importance of identifying vulnerable customers is obvious. If we are not aware of a customer's vulnerability, we are unlikely to be able to give them the right support. At the same time, identification may be difficult. When providing support over the phone, our advisors are unable to see a customer's body language and expressions, so they



will have to rely on more subtle information. With only 1% of customers openly discussing their vulnerability, this presents significant challenge. However, our training material helps advisors notice phrases and signals that might indicate a vulnerability.

We agree that there should be greater awareness of the support we give to vulnerable customers. Whilst we are willing to put more emphasis on this area, it would be helpful if Ofcom and other interest groups and charities could also assist. Customers may not think to discuss their vulnerability with their telecoms provider, and, even they are aware of support they may be able to get, may not be willing to disclose any information about their vulnerability.

In terms of Ofcom's suggestions, we support including a question around specific needs they may have in the conversation with customers. We also supportive of making it easy for our customers to share information about their vulnerability with us. All our advisors are able to flag a customer's account, and this can be done via phone, telesales, web chat and in store. We question the value of providing each customer with a statement about the help we offer vulnerable customers, as this will not be applicable for all customers. We believe it is important to ask customers whether they need any additional support, and if so, to explain the available support and services. This should be further supported with easily accessible and clear information online and a good general level of knowledge in relation to vulnerability for our frontline.

## How providers can help vulnerable consumers

We agree that it is important to offer all our customers a wide range of communication channels. In terms of customers carrying out important account activities, we believe that not every channel is suitable for each activity. Customers currently cannot take out a contract via post (i.e. request a contract in that way) and we do not believe this is suitable. We appreciate that some vulnerable customers may have difficulties using the phone. For those groups web chat or store may be a good alternative.

## Make customer interactions a positive experience

We obviously strive to make every customer interaction a positive one, whether the customer is vulnerable or not. Once we have identified a customer as vulnerable, our advisors are trained to ask a number of questions, using an established model.

Advisors are partially scripted, to ensure a natural flow of conversation, and they are trained to include relevant pieces of information into the conversation. Apart from the ability to flag a customer's account, every advisor has to put in notes of the



conversation after each interaction. This prevents a customer from having to repeat their query or issue each time they call. Whilst the flag will indicate that the customer is vulnerable, and indicate the type of vulnerability, the notes can go into further details about the support or services required, and the issues encountered, only with the explicit permission from the customer. The notes will remain on a customer's account for each subsequent advisor to see and use for a 12-month period if a temporary vulnerability, or will remain permanently on their record.

Ofcom's suggestion to put in place a direct contact for customers who want it may be difficult to implement (assuming a direct contact will be an individual advisor). Individual advisors will not be on call continuously and may therefore not always be there when a vulnerable customer needs support. We consider that a dedicated team is sufficient, in combination with flags and high quality notes on customers' accounts.

### Offer follow-up information in writing

If customers request follow up information in writing we are able to provide this in a variety of formats and have an established process to provide this service. However, we are a digital first company and send all of our terms and conditions and other associated documents as durable media via email. At any point, a customer may change their preferences.

### Promote the extra help, support and services that are available

We have been engaging with interest groups and charities to develop our policies and training material. In addition, we are considering partnerships and collaborations to continue to learn and share in this area but also as a way to promote the services we have. Vodafone have commented on a statement that should be sent alongside contractual information. We believe sending additional information, as part of a substantial pack of information, is not going to be effective as we will have clearly communicated information to relevant customers and will send them information regarding services and support should they require it. The same view applies to the annual reminder. It would be helpful to gain some insight into the effectiveness of an annual statement in other sectors, if available.



## Implement specialist customer service teams or identify staff members who can help

We agree that a specialist team is a very good way to deal with more specific and difficult issues. Our specialist team receives additional training and the information sharing within the team further strengthens the team's knowledge and experience.

We include references to third parties, in particular for customers who are vulnerable from a financial point of view and customers with mental health issues.

## Help third parties, such as relatives or carers, who are supporting vulnerable consumers

We offer customers the option to nominate a third party to help look after their account, the so-called 'Protected Service'. We have a responsibility to balance flexibility and data protection requirements regarding third party access to accounts. Switching the third party service on and off will require speaking to our specialist team. In terms of the third party receiving the notification of the vulnerable consumer, this will be very hard to implement in practice.

## Act fairly when a consumer is facing problem debt

We appreciate that being in debt or in arrears can be stressful to customers. Our policies take this into account by offering customers an opportunity to discuss payment plans before going into arrears. We give the customer time to consider their position and will halt any incremental fees if they are a genuine vulnerable customer. In addition to this, we offer services of debt advisory and money management charities and organisations. ... . Part of those payment plans allow customers to transfer onto a basic, less expensive tariff so they can better managed their financial difficulties.

# 4. Recording information

## Recording consumers' needs

Our training material sets out what information should be recorded in relation to vulnerable customers. Advisors are trained to use the customer's words when they



record details of the vulnerability, not their own interpretation. In terms of flagging a customer's account, advisors will ask the customer's explicit permission to do so and will explain to the customer how the information is used. As set out above, the advisor will ask a few questions to get a better understanding of the needs of the customer.

## 5. Monitoring performance

### Evaluating staff performance

We currently monitor our staff performance in this area through call monitoring, Net Promoter Scores (NPS), and complaints. Currently, the performance of our specialist team is entirely based on its interactions with vulnerable customers. The performance of our advisors outside the specialist team in respect of vulnerable customers will be monitored using call monitoring, focusing on key words and assessing calls from flagged accounts.

Advisors can share suggestions and tips through file sharing mechanisms, ensuring all customer related information is anonymised.

### Gathering and using customer feedback

Vodafone has an employee well-being group where issues related to vulnerability are discussed. In addition, vulnerability is included at conduct risk forums.

We currently use complaints to gain insight into any process, system or staff issues. A sample of complaints is analysed on a monthly basis, including listening to call recordings and checking notes on customers' accounts. This is a powerful way to carry out root-cause analysis. In addition, we monitor trends for different categories of complaints.

## 6. Staff training

### Delivering effective training to all staff

We agree with the importance of training in this area, in particular because of the large variety of vulnerabilities and the difficulty of identifying certain vulnerabilities. We have developed specific training on identifying vulnerability, how to record and manage



vulnerabilities, and our policies and services. This will be rolled out to the whole organisation. Frontline advisors will receive detailed classroom training with case studies and a test to ensure understanding. If they do not pass the test, they must retake the whole training.

Vodafone consider training as an ongoing piece rather than a one off so will continue to engage with third parties, and use customer and advisor feedback to further refine and develop messages and training to all of our staff.

As part of the changes to the General Condition, we have updated the front line knowledge hub, known as OneKnowledge. This is accessible to all advisors and contains information about all of our processes, products and services.

### Collaborating with consumer interest groups and charities

In order to deepen our understanding we will continue to engage with interest groups and charities. As set out above, we also take part in the Vulnerability Forum, chaired by the Communications Consumer Panel and will continue to use the insights gained.