

## **Vulnerable Persons Policy**

The purpose of this policy is to ensure that the operations of SOS BPHC Ltd do not have any negative impact upon vulnerable consumers.

For the purposes of this policy vulnerable consumers are customers and prospective customers whose ability or circumstances require us to take extra precautions in the way that we provide our services in order to ensure that they are not disadvantaged in any way.

### **Identifying a vulnerable consumer**

When engaging with customers over the phone it is often difficult to identify a vulnerable consumer because it is not possible to see many of the characteristics, such as body language and facial expressions, which may identify whether the prospective customer requires additional information and guidance to enable them to make an informed decision. For this reason it is critically important to listen carefully to all customers and to identify people who may be classed as a vulnerable consumer.

Typical telephone characteristics include:

- An inability to hear or understand what is being said
- Repeated questions of a similar nature
- Comments or answers which are inconsistent with the telephone discussion or which indicate they have not understood the information which has been provided.
- Verbal communication that they don't understand or that they require the assistance of somebody else in making a decision.

### **What to do if we are engaging with a vulnerable consumer**

Just because somebody is vulnerable does not automatically mean that they are unsuitable for the products and services the firm supplies. As soon as we think we may be engaging with a vulnerable consumer we should immediately make a record of the same and ensure we adhere to this policy.

When speaking to the vulnerable consumer:

- Provide additional opportunities for the customer to ask questions about the information we have provided.
- Continuously seek confirmation that they have understood the information that has been provided.
- Ask if there is anybody with them who is able to assist them, and offer them the opportunity to have a family member or friend join the conversation.
- Offer them the opportunity of a return call after a period of further consideration.

If for any reason we think the customer does not understand the service which is being offered to them, we will not proceed and advise them that we will write to them with further information about the services available.

All records of potential engagement with vulnerable consumers will be recorded on vulnerable person log.