# 1. Purpose

### The Purpose of the Policy

The purpose of RideOn's Vulnerable Customer Policy is to set out our approach to identifying and interacting with vulnerable customers to ensure RideOn delivers "fair customer outcomes". A "fair customer outcome" is a wide definition and does not just relate to the avoidance of financial detriment, it includes instances which cause or could cause distress and inconvenience. The purpose of this policy document is to:

▪ Define what constitutes a vulnerable customer.
▪ Set out how customers will achieve a fair outcome.
▪ Outline the controls that ensure adherence to the Vulnerable Customer Policy.
▪ Outline how vulnerable customer consideration will be used to drive business improvements.

### Applicable Regulations and Legislation

The RideOn approach to the treatment of vulnerable customers evolves in line with consumer and Regulatory demands. Treatment of vulnerable customers is covered within FCA principles 2,3,6,7 and 9 and is supported through industry and regulatory guidance which is monitored and reflected within the Policy.

In addition, the Policy reflects RideOn's legal obligations:

- The Equality Act (2010) – No discrimination and making reasonable adjustments.
- General Data Protection Regulation – processing special category data under the Data Privacy Policy.
  **Requirements of the Policy**

  To deliver fair outcomes to our customers we must consider the circumstances of each individual and in our dealings with them tailor our approach, removing any barriers that restrict the customer achieving a resolution and accessing our products and services.

  RideOn has no appetite for customer conduct failure.  We aim to build understanding and trust with our customers and seek to deliver fair outcomes.

# 2. Scope

This Vulnerable Customer Policy applies to RideOn which includes agencies who act on behalf of us and all services and products that are provided to customers or stakeholders. The standards set out in the policy will apply to providers, where the third party interacts directly with RideOn customers.

This policy relates to the treatment of vulnerable customers.

# 3. Definitions

**RideOn vulnerable customer definition**: A vulnerable customer is someone who due to their current personal circumstances may be susceptible to detriment and therefore may require us to engage with them in a different way in order to meet their individual needs.

**Stakeholder**: A person, company or group that hold the power or obligation to act on behalf of a group customer. The stakeholder may be in control of the asset in the interest of the beneficiary. Examples of stakeholders include but are not limited to; Solicitors and Power of Attorneys.

- **Third Parties**: RideOn uses several third parties to provide elements of the overall product and service proposition. Depending upon the product and service, and supporting contract, the nature of the relationship can include:

  - Product business partner (e.g. YBS customers introduced to a third party)
  - Customer-facing service provider
  - Non-customer-facing supplier (e.g. provision of supporting service within wider process)

**Colleague**: YBS colleagues (permanent and temporary) and colleagues delivering services to the YBS as employees of third parties.

**Customer Facing Colleague**: is a colleague that will as part of their day to day routine, interact with customers through any channel.

**First Point of Contact (FPOC):** is the colleague/department, including third parties and outsourced service providers, that is the first point of direct business interaction with customers identifying complaints.

**Non-customer facing areas**: is a department or team where colleagues will not typically engage with customers as part of their daily routine. They will predominately, but not exclusively, be located in the Business Direction and Business Enabling functions.

**Vulnerable Customer Panel**: Is a defined member panel that sits to ensure customers receive fair outcomes which are appropriate to their circumstances and without exposing the Society to unnecessary risk. The panel will meet and:

- Aim to find suitable solutions which may be available to the customer where our standard process and procedures would put them at a disadvantage due to their circumstances and all other options have been exhausted or;

- Review Unacceptable Customer Behaviour (UCB) where a Vulnerable Customer has displayed behaviour that would act as a mitigant against our zero tolerance policy.

## 4. Policy Statements

**Vulnerable Customers**

The categorisation of a customer as "vulnerable" must consider a combination of factors including whether the vulnerability is either a permanent or a temporary situation for an individual. The basis of whether a customer is vulnerable, or not, must be assessed on a case by case basis and this assessment must consider the key factors which may make them susceptible to unfair customer outcomes.

The following are types of circumstances and characteristics may suggest vulnerability, but these are **not exhaustive,** and the identification of vulnerable customers must be individual, responsive and aimed at removing barriers to accessing our products and services.

| | |
|---|---|
| Age | Financial Hardship |
| Mental Health | Language Barriers |
| Low Income Levels | Mental Capacity Limitations |
| Addictions and/or Substance Abuse | Life Changing Event |
| Health Condition | Victim of Financial Crime |
| Environmental Impact, such as flood | Low Level Digital Skills |
| Financial Abuse | |

**Identification**

- Customers may be recognised as potentially vulnerable through self-identification or through indicators the organisation has identified. All colleagues have a responsibility to remove barriers for customers and should consider this overarching policy when interacting with any customer or potential customer to highlight and identify potential vulnerabilities.

- Customers must be able to contact us through any of our communication channels and by any reasonable means, which may include asking a third-party representative to act on their behalf, to notify us of vulnerable circumstances without any barrier.

- A non-customer facing colleague that identifies a potential vulnerable customer must communicate the details to the Customer Solutions Team immediately, where exploration of circumstances will be completed by Customer Solutions in liaison with the non-customer facing colleague if required.

**Treatment**

- Due to the diversity of the factors that can contribute to the level of customer vulnerability (see table 1) there will not be one approach that can be adopted to fit each circumstance. The over-riding principle that must be adhered to by colleagues in their dealings with vulnerable customers is that fair outcomes are achieved throughout the customer journey, and any barriers are removed to access our products and services. It is therefore essential that colleagues take a flexible approach as our failures can lead customers to suffer financial and non-financial impacts.

- Colleagues must consider vulnerable customer needs in all interactions; alternative communication channels and methods, such as Braille or Large Print, will be accommodated where possible to remove access barriers.

- Processes and procedures including changes to these will be tailored to enable the identification and treatment of vulnerable customers specific to the nature of the product or services offered and our interactions with customers across the whole customer journey.

- Business areas must make us of available MI, Insight Data and lead indicators to identify any emerging vulnerable customer risks.

- Colleagues must offer those customers who have been identified as vulnerable, regular reviews at intervals appropriate to their circumstances to establish whether their classification and treatment continues to be appropriate.

- Where a vulnerable customer has cause to complain and their complaint cannot be resolved at FPOC, the complaint will be triaged by MOT. Where the complaint may impact upon the customers vulnerability the complaint will be given priority status.

- Colleagues must escalate individual cases where vulnerable customers are at risk of an unfair outcome with situations that fall out of existing policy / procedure to the Customer Solutions team for review. The Vulnerable Customer Panel may sit to determine the most suitable outcome for the customer.

- Colleagues must seek to provide additional support to enable customers to make informed decisions and maintain access to products and services.
- When recommending or applying digital solutions for customers (such as registration for online) it is important to consider that they have both the access and skills to continue to service their account online and that we aren't creating further barriers for them in the future.

- Colleagues must treat all authorised third-party representatives in the same way as the customer to ensure there are no barriers for the customer.

- The Society has an obligation to protect its colleagues and customers from unacceptable customer behaviour (UCB). There is specific guidance which stipulates how these instances will be handled, which specifically references how vulnerable customers will be treated in these scenarios which may include a referral to the VC panel.

**Products, Channels and Business Change**

- Products will be designed by the appropriate product development team and will take into account vulnerable customer considerations; this will be managed under the product governance process.

- All products and channels including written, face to face, phone and online digital channel will be periodically reviewed based on an appropriate risk rating to ensure vulnerable customer considerations, this will be managed under the product and relevant channel governance processes.

For any Business Change, the impacts to vulnerable customers will be considered as outlined in our Change Lifecycle

**Related Policies**

- Other Group policies must pay consideration to the Vulnerable Customer Policy see section 1.

- There must be consultation and referral with the Vulnerable Customer Policy Owner and/or Sponsor, for other policies which are linked to this Policy prior to any related policies being changed. Changes should be heard through the Customer Services Division Risk Committee for oversight, to ensure all policies are attuned in their approach to consideration of vulnerable customers.

**Third Party Relationships**

- RideOn works with several third parties in delivering products and services to customers. Colleagues, who manage third party relationships, where the third party interacts directly with RideOn customers, are required to meet the expectations outlined in the Vulnerable Customer Standards for Suppliers. Depending on the service or product provided, vulnerable customers may be interacting with either RideOn or by the related supplier. In either situation, the Business Relationship Management approach will outline the process to be taken and the governance arrangements that support the delivery of this service.

**Controls and Adherence**

- The Vulnerable Customer Policy and accompanying guidance will be clearly signposted on the intranet and accessible by all colleagues.

- RideOn operates a breach reporting process (defined separately), which could potentially result in a communication with the appropriate regulator.

- When assessing whether a breach of this policy and associated procedures has occurred, all colleagues must also consider whether a regulatory breach (including breach of a Conduct Rule or the wider requirements of Our Trust Code) has occurred. All suspected regulatory breaches (including breaches of Conduct Rules) must be reported through the Regulatory Compliance Breach Incident Reporting Procedure.

- Regulatory Policy and Advice scan the horizon to mitigate future issues and concerns by anticipating potential risks that may emerge and monitoring regulatory developments, sharing regular updates with key YBS stakeholders.

- RideOn recording of sensitive personal data meets General Data Protection Regulation (GDPR) requirements, regarding each vulnerable customer record and additional support measures. This is in accordance with the Data and Record Retention Schedule, which supports the Information Management Policy. Records can be maintained for a minimum of 10 years.

- When recording and handling personal data, and in particular special category data, colleagues must adhere to the Data Privacy Policy.

- Resolution Delivery provides regular and accurate reporting to senior management.

## 5. Implementation and Monitoring

### Implementation

- All RideOn colleagues are required to undertake and pass the 'Vulnerable Customers' e-learning test, on the intranet Learning Portal, annually and as a new starter.

- Policy updates will be communicated via Newsfeed and any other appropriate mechanisms to cascade to colleagues will be agreed.

- The Resolution Delivery Team business partner to ensure all colleagues responsible for adherence understand requirements set out in the Policy.

- Resolution Delivery and Moments of Truth will support colleagues to identify and implement appropriate customer treatment.

### Monitoring

- Vulnerable Customer MI is regularly reviewed by Resolution Delivery to ensure regular oversight and adherence to the Vulnerable Customer Policy and associated guidance by colleagues.

- Where issues/trends are identified which may suggest the Policy is not being followed, actions are formally tracked through Resolution Delivery Team Business Partner meetings and if required escalated through the Complaint and Vulnerable Customer Forum (quarterly basis), which is a sub-meeting of the Customer Service Division Risk Committee.

- There are also operational performance controls and governance within business functions – whether mandate levels, in-built governance process controls, or management checking. The Senior Managers have primary responsibility for these controls to ensure adherence to this policy.

- Additionally, a programme of oversight from 1st line risk teams and 2nd/3rd line functions will provide regular assurance and engagement from an independent perspective.

- Oversight of Vulnerable Customer is undertaken by the following activities:

| ACCOUNTABILITY | ROLE HOLDER |
|---|---|
| Quality Assurance (1st Line Risk) | Directors of Operational Risk and Control |
| Training & Competency | Directors of direct customer contact functions |
| Compliance Monitoring | Director of Compliance |
| Audit Monitoring | Chief Internal Audit Officer |

Early notification of risks and issues will be reported to the Divisional Director of Risk in respect of any policy dispensations with a potential impact <£500k.

The Enterprise Risk Team will be notified in respect of any policy dispensation with a potential impact >£500k (N.B formal risk tolerance may be required if relevant).

## 6. Approval

The Vulnerable Customer Policy is approved by the Customer Services Division Risk Committee, Enterprise Risk Committee and Board.

The Vulnerable Customer Policy is annually reviewed and re-approved.