

Dated 8th December 2022

BOUTIQUE CAMPING SUPPLIES LIMITED

VULNERABLE CUSTOMERS POLICY

version 29.11.22

1 POLICY STATEMENT

- 1.1 Boutique Camping Supplies Limited, company number 07401199 with registered address at 1st Floor Quadrant House, 9th Heath Road, Weybridge, England KT13 8SX (“**Company**”, “**we**”, “**us**”, “**our**”) are committed to identifying, assessing, and managing vulnerable customers in accordance with our own objectives and this policy, as well as any relevant regulations and guidelines. We aim to treat all customers defined as vulnerable, or with the potential to become vulnerable, in a fair, clear, and respectful manner.
- 1.2 We have implemented several identification and assessment tools aimed at identifying, assessing, and dealing with various vulnerable customer situations and to consistently ensure that our staff are aware of vulnerable customers and how to handle vulnerable customer situations.

1.3 Our policy set out our intent and obligations with regard to handling customers with vulnerabilities and includes external guidance and information as provided by the Financial Conduct Authority (“FCA”) and the Money Advice Liaison Group (“MALG”).

2 PURPOSE

2.1 The purpose of this policy is to identify and support vulnerable customers and to promote transparency and openness in all business practices and processes that the Company and our staff create and engage in. It also defines the steps to be taken by all staff when dealing with vulnerable customers or associated situations.

2.2 We are committed to ensuring that all customers are treated in a fair and consistent manner, but we also recognise that some circumstances require additional interactions and/or steps to ensure that the customer is getting a product/service that is suitable and ethical.

2.3 Our staff are to identify, assess and deal with vulnerable customers. We are committed to ensuring that our customers are treated in a fair, reasonable, and supportive manner.

3 SCOPE

3.1 This policy relates to all staff (meaning permanent, fixed term, and temporary staff, any third-party representatives or sub-contractors, agency workers, volunteers, interns, and agents engaged with the Company in the UK or overseas) within the organisation and has been created to ensure that staff deal with the area that this policy relates to in accordance with legal, regulatory, contractual, and business expectations and requirements.

3.2 The FCA’s definition of vulnerability refers to customers who, due to their personal circumstances, are especially susceptible to harm, particularly when a firm is not acting with appropriate levels of care.

3.3 The FCA also notes the following factors and examples that may act as drivers to actual or potential vulnerabilities:

(a) Health – health conditions or illnesses that affect ability to carry out day-to-day tasks. Examples include physical disability, illness, hearing or visual impairment, mental health condition or disability, addiction, low mental capacity, or cognitive disability.

(b) Life events – life events such as bereavement, retirement, income shock, relationship breakdown, domestic abuse (including economic control), caring responsibilities, or any other circumstances that affect people’s experience of financial services.

(c) Resilience – low ability to withstand financial or emotional shocks. Examples include inadequate or erratic income, over-indebtedness, or low emotional resilience.

(d) Capability – low knowledge of financial matters or low confidence in managing money (financial capability), low capability in other relevant areas such as literacy or digital skills, learning difficulties, or no to low access to help or support.

3.4 The two main definitions of a vulnerable customer as used by the Company are:

- (a) **Customers who are unable, for whatever reason, to make an informed decision at the time of our dealing with them** – customers falling into this category include those with language barriers, hearing difficulties, mental health conditions, those suffering from bereavement, those with learning difficulties, or the elderly. These customers may struggle to decide on whether the service or product we are providing is in their best interests.
- (b) **Customers whose welfare (financial, mental, or physical) could be put at risk through choosing the service or product we offer** – these customers include anyone who might be put at a detriment from taking up our offer/product/service.

3.5 Further to FCA guidance, to achieve good outcomes for vulnerable customers, firms should:

- (a) understand the needs of their target market/customer base;
- (b) ensure their staff have the right skills and capability to recognise and respond to the needs of vulnerable customers;
- (c) respond to customer needs throughout product design, flexible customer service provision and communications; and
- (d) monitor and assess whether they are meeting and responding to the needs of customers with characteristics of vulnerability and make improvements where this is not happening.

4 OBJECTIVES

4.1 We have developed the below objectives which are used to create our internal procedures for dealing with vulnerable customers.

4.2 The Company aims to:

- (a) ensure that we have the suitable, relevant, and compliant tools, controls, and measures in place to identify, handle and monitor vulnerable customers;
- (b) train our staff on the identification, communication and understanding of what vulnerabilities are and how to approach them;
- (c) have robust vulnerable customer procedures in place at all times and ensure their continued relevance and compliance with applicable regulations and guidelines;
- (d) research and take expert advice on specific vulnerabilities such so that our staff and procedures are adequately aligned with the standards;
- (e) use support aids and scripts for front line staff;
- (f) use ongoing assessment tests and evaluations for all staff to ensure understanding and knowledge of vulnerabilities; and
- (g) put in place vulnerable customer aids to help customers with specific situations, as further set out in this policy.

5 CONTROL AND MEASURES

- 5.1 The Company understands that the term “vulnerable customer” applies to varied situations and circumstances. Therefore, we have outlined the procedures in this document for each vulnerable customer type as identified in this policy.
- 5.2 This policy contains specific vulnerable circumstances and the steps that we take to manage each situation. However, we also have generic procedures as set out below which are applicable to every vulnerable customer situation and have been developed to meet the regulatory standards as well as taking into consideration the needs of those with additional vulnerabilities.
- 5.3 Where a customer has been identified and/or declared as being vulnerable, the Company endeavours to ensure that the below steps/processes are followed:
- (a) ensure that all staff are provided with the training and tools to identify, understand, and deal with vulnerabilities and vulnerable customers;
 - (b) email/telephone sales information and/or advice is followed up in writing containing the discussed content and any relevant terms and conditions and disclosure information;
 - (c) with regard to debt collection and/or debt management services (as applicable), accounts will be placed into a manual process (as opposed to automated), to ensure that the customers’ situation is properly handled;
 - (d) ensure that staff on the front line are provided with additional vulnerable customer training and given appropriate lines of reporting should they need to escalate a matter;
 - (e) ensure that ways to contact us are clearly visible on all communications and our website and provide a choice of ways to communicate with us;
 - (f) ensure that all written materials are clear, to the point, and jargon free;
 - (g) ensure that where applicable, the products/services that we offer are flexible and made to suit the customers’ needs and requirements;
 - (h) offer flexible outcomes on products/services as dictated by the customers’ situation and circumstances;
 - (i) deal with any authorised third-party in a helpful and transparent manner;
 - (j) ensure that any sensitive and/or confidential information disclosed to us regarding the customers’ vulnerability is safe and secure and used, stored and destroyed in accordance with applicable data protection laws in the UK; and
 - (k) flag accounts where a vulnerable customer has been identified so that other staff can see how the account is to be managed in the future.

Vulnerable awareness review

- 5.4 The Company has identified and reviewed multiple factors that may pose harm or act as a barrier for vulnerable customers using our products/services and have developed measures and controls to reduce or eliminate the impact of these.
- 5.5 We have assessed the impact of vulnerability on the needs of our customers by reviewing our target market and existing customer base to identify the types of harm or disadvantage that are relevant to our industry and business activities. We also utilise internal data from previous interactions with vulnerable customers to identify patterns in the types of people who are more susceptible to vulnerabilities based on the products/services that we provide.
- 5.6 We have reviewed and incorporated the FCA guidance on dealing with vulnerable customers and have used their driving factors and potential harms to further develop our policy and measures in this area.
- 5.7 We recognise that vulnerable customers are more likely to experience certain barriers or issues as a result of their vulnerability and we continuously work hard to ensure that our products, services and advice are flexible, accessible and inclusive.
- 5.8 In accordance with FCA guidance, we understand that the potential harms below can be a factor for many vulnerable customers, and we pay specific attention to these areas when dealing with any customer who has been identified as vulnerable or potentially vulnerable:
- (a) financial exclusion
 - (b) difficulty accessing services;
 - (c) disengagement with the market/partial exclusion;
 - (d) inability to manage a product/service;
 - (e) over-indebtedness;
 - (f) buying inappropriate products/services and exposure due to mis-selling; and
 - (g) scams and financial abuse;.
- 5.9 Based on the above factors, we have been able to consider the impact to customers and possible effects and outcomes of these potential harms. This has enabled us to consider the needs of vulnerable customers and to develop effective controls, products and services aimed at making our company approachable, inclusive, and accessible.

Employee awareness and training

- 5.10 We endeavour to embed the fair treatment of vulnerable consumers across the workforce.
- 5.11 The Company provides training, remind, and update our staff on the requirements, guidelines, and company ethos of dealing with vulnerable customers. We are committed to providing ongoing training and follow up all training sessions with assessments and feedback forms to ensure our staff engage with and understand the material from our trainings.

- 5.12 We recognise that informing, training, and assessing front line staff and those with dedicated vulnerable customer roles are essential in removing barriers and reducing potential harm. We endeavour to ensure that our staff have adequate and effective skills and knowledge to help vulnerable customers and to ensure that the appropriate product, service, or advice is provided.
- 5.13 We endeavour to implement systems and processes that take into consideration potential vulnerabilities and support employees in their work and understanding. All employees are trained during induction in using the systems available throughout the organisation and have access to ongoing support where needed.
- 5.14 We provide staff with access to various publications and guidance on vulnerabilities and at-risk groups, including, for example, those from professional bodies and trade associations or charity and consumer organisation websites.
- 5.15 The Company utilises vulnerable customer assessments to check our staff's understanding, skills and capabilities, in particular those who deal with vulnerable customers as part of their roles. Managers are required to test and verify skills and capabilities on a regular basis and are responsible for ensuring that all employees have access to resources and publications relevant to vulnerabilities.

Communications

- 5.16 The Company recognises that how we communicate with our customers, especially those who are vulnerable, is essential. Failure to communicate with vulnerable customers in ways they can understand may result in an increased risk of harm.
- 5.17 Whilst some vulnerabilities require minor adjustments to aid the customer, such as large print letters or audio options, we recognise that some temporary or circumstantial vulnerabilities (i.e., bereavement, divorce, illness, anxiety etc) may mean that flexibility and alterations in our processes and communications may be needed to support the customer.
- 5.18 Further to the above, we have assessed our target market and existing customer base to identify vulnerable customers or potential vulnerable groups and have strived to develop and implement effective and adequate methods of communication suitable to such vulnerabilities identified. For example, we endeavour to ensure that:
- (a) all forms and methods of communication and information are presented in a way that is accessible and understandable for all customers;
 - (b) our communications formats support customers with sight or hearing impairments (such as large print formats, braille, and audio support options); and
 - (c) language support is available to support customers who may need it (such as translation services, interpretation services, and materials and literature made available in other languages).

Signposting

- 5.19 The Company strives to be proactive in ensuring that all customers know how and where to access internal and external support and guidance. Where this applies to vulnerable customers, we endeavour to signpost our customers to where additional support could be obtained. Such signposted information is provided:

- (a) on our Company website;
- (b) via links in customer communications (such as emails and text messages, as applicable);
- (c) during sales, advice, or customer service calls; and
- (d) within our complaint handling procedure.

Recording information

- 5.20 The Company recognises that it is essential for all employees to know and understand how to record information relating to vulnerable customers. If a vulnerability or issue is raised with one employee, it is imperative that this information is accurately logged, so that all subsequent dealings with the customer have the same approach and continuity of care.
- 5.21 Employees are trained on using the Company systems and understand how to record and log information and how to action any specific system controls to flag vulnerable customers or potential concerns.
- 5.22 The steps of the model include;
- (a) **T**hanking the customer for their disclosure;
 - (b) **E**xplaining how their disclosed information will be used;
 - (c) **E**xplicit consent or carrying out of checks to ascertain if the customer objects to data processing (depending on the basis on which the data will be processed);
 - (d) **A**sking the customer questions to find out key information to understand the situation better; and
 - (e) **S**ignpost to internal support or to external services with appropriate expertise.

6 SPECIFIC VULNERABILITIES

- 6.1 The Company recognises that any person can become vulnerable at any time and not all vulnerabilities can be categorised or labelled. However, through our research and assessments of publications into vulnerabilities, we have developed and implemented certain measures and controls for vulnerable categories and issues that are more common and identifiable. As further detailed in this policy, these categories are:
- (a) customers with financial difficulties;
 - (b) elderly customers and those with general vulnerabilities;
 - (c) customers with sight or hearing difficulties or language barriers;
 - (d) customers who are young and/or inexperienced; and
 - (e) customers with over-indebtedness and/or mental health conditions.

- 6.2 Our communication channels and customer service processes encourage customers to share information about their vulnerability and associated needs and we use this information to further develop our existing procedures, controls, materials, and products/services.
- 6.3 We welcome customer feedback and include such feedback in our vulnerable customer training sessions. Feedback and complaints are reviewed regularly to ensure that any issues raised by those considered vulnerable are addressed and revised as soon as possible.

Financial difficulties

- 6.4 Where possible, it is the Company's aim to prevent an account from entering into arrears in the first instance. Where previous arrears have occurred or the customer has already notified us of financial difficulty, the account is flagged and monitored, and close communication kept with the customer for a specified period.
- 6.5 Where possible and/or applicable, we endeavour to ensure that we:
- (a) offer flexibility in payments, such as missing a payment and making double payment the next month, payment holidays, or accepting lower instalments for a set period and then increasing payments to make up the shortfall;
 - (b) where a customer is not yet in a business relationship with us and they are applying for a loan or credit arrangement, carry out a credit check and affordability assessment to ensure that they are in a financial position to meet the ongoing repayments;
 - (c) where payment is missed on an account for whatever reason, follow up with the customer and remind them about payment, as well as providing them with guidance as to how they should contact us if they are experience financial difficulties; and
 - (d) notify the applicable account manager or arrears team about missed payments.
- 6.6 We assess all accounts and credit agreements on a annual basis to identify if any customer has developed financial difficulties during their contract period. This ongoing monitoring includes:
- (a) [contacting any customer who has missed or delayed one or more payments and completing an affordability assessment and new credit check; and
 - (b) flagging accounts where a customer has made one or more late payment and monitoring that account closely. Where more than 3 payments are made after the due date, the customer is contacted to discuss the reasons for late payment and the due date is either changed (i.e., if the customer's pay day has been moved) or an affordability assessment is completed.]

Elderly and general vulnerabilities

- 6.7 The Company understands that elderly customers and those with circumstantial vulnerabilities may still need the products/services that we offer. However, we aim to give more time, consideration, and options to such customers due to their possible inability to process information as quickly as others may.

- 6.8 Where possible and/or applicable, we endeavour to ensure that we:
- (a) speak with an authorised third-party to liaise with the customer and ensure that the details of the product/service are being correctly relayed;
 - (b) provide all discussions and product information in writing prior to the customer receiving/signing any contractual agreement;
 - (c) during phone calls, reiterate all important information and the details of any financial implications from taking out the product/service;
 - (d) allow time for the customer to read, understand and gain third-party assistance with any documentation and/or contractual agreements;
 - (e) clearly explain the benefits and disadvantages of the products/services and any implications that may be associated with missed payments or breaches in contract;
 - (f) provide extra time for the customer to cancel the contract after the agreement has been signed; and
 - (g) increase the time limit for returning any products purchased online.

Sight or hearing difficulties or language barriers

6.9 The Company considers those with language barriers, sight, or hearing difficulties to be vulnerable as they can be at a disadvantage hearing or understanding the product/services being offered.

6.10 Where possible and/or applicable, we endeavour to ensure that we:

- (a) speak with an authorised third-party to liaise with the customer and ensure that the details of the product/service are being correctly relayed;
- (b) provide all discussions and product information in writing prior to the customer receiving/signing any contractual agreement;
- (c) offer braille and/or large print materials;
- (d) offer materials in alternate languages where possible; and
- (e) ensure that the customer has had enough time to gain advice from a family member or appointed representative before following up with any calls.

Young and/or inexperienced

6.11 The Company is committed to ensuring that any person who may have difficulties understanding the products/services that we offer, for example because of age and/or lack of experience, are provided with extra support.

6.12 Where possible and/or applicable, we endeavour to ensure that:

- (a) all sales calls are followed up in writing and any relevant disclosures are provided ahead of any contractual agreement being provided;

- (b) the benefits and consequences of any product/service are fully explained along with any legal implications for having the products and missing payments; and
- (c) additional time is provided between the sales call, written follow up and contractual agreement to allow the customer time to communicate with applicable third-parties and understand the content of the product/service offered.

Debt and mental health

- 6.13 Mental health may result in a customer being vulnerable. The Company provides thorough staff training and support to identify and deal with customers who have declared a mental health condition to us or otherwise meets the criteria for having a mental health condition.
- 6.14 The Company aims to:
- (a) take steps to establish whether the mental health condition affects the customers' ability to manage money or their debt;
 - (b) work with the customer in a patient, clear and helpful manner;
 - (c) provide reasonable periods of time for the customer to provide evidence of any mental health condition and place accounts on hold during this period;
 - (d) prevent any interest and/or charges from being added to the account during the consultation period;
 - (e) work with authorised third parties to help the customer with their debt issues.]
- 6.15 Where the Company has identified that a customer is considered vulnerable, we always encourage them to disclose any potential mental capacity limitation and actively look out for indicators of a potential mental health capacity limitation.
- 6.16 Any information collected regarding a customer's mental health is always kept secure and encrypted in accordance with our information security protocols and is only retained for as long as necessary under applicable UK data protection laws.
- 6.17 We do not exclude a customer from using/purchasing our products/services on the basis that they have been identified as vulnerable.
- 6.18 Where possible and/or applicable, we endeavour to ensure that:
- (a) accounts are placed on hold and charges/interest are frozen during any communication and consultation period;
 - (b) all staff with a responsibility for using medical evidence are trained in how to read, interpret and make decisions about the basis of medical evidence;
 - (c) appropriate communication channels are used depending on the individual circumstances of the customer, including their mental health condition; and
 - (d) customers are treated on a case-by-case basis according to their mental health conditions and all factors are taken into consideration when processing an account.

7 AUDITS AND MONITORING

- 7.1 The Company carries out regular internal audits and gap analysis monitoring on all business practices and procedures to ensure that our vulnerable customers ethos and objectives are being met.
- 7.2 The Company has a number of measures and controls for monitoring and assessing our approach to vulnerable customers. These include:
- (a) providing regular management information reports to senior management on our approach to vulnerable customers and the outcomes of delivered solutions and controls;
 - (b) evaluating and recording instances where the Company has not met the needs of one or more vulnerable customers and developing an action plan for improvements;
 - (c) assessing and testing employee skills and capabilities for dealing with vulnerable customers and providing feedback to employees;
 - (d) carrying out quality assurance and audits on services and products to ensure that they are suitable for all customers and maintain flexibility for those who are vulnerable; and
 - (e) carrying out data analysis on complaints and accounts involving vulnerable customers to evaluate effectiveness and to develop improvements where necessary.

8 RESPONSIBILITIES

- 8.1 The Company ensure that all staff are provided with the time, resources, and support to learn, understand, and implement applicable vulnerable customers procedures into their business practices.
- 8.2 Company Directors are responsible for vulnerable customer audits and gap analysis monitoring and their subsequent reviews and action follow ups. We maintain a continuous audit trail of all vulnerable customer audits and feedback to ensure continuity through each process and task.
