

## Vulnerable Customer Policy

This document contains information on how Broadband for Surrey Hills (B4SH) will deal with vulnerable people. This document has been created in response to Ofcom's "Treating vulnerable customers fairly" guidance published 23rd July 2020. It should be noted that Ofcom's notes are not law, but a set of suggestions for how best to apply the law and enact best practice.

Most of this document is based on the support which B4SH already offers our customers.

### 1. Introduction

As a Community Benefit Society B4SH's purpose is to serve the needs of the residents of The Surrey Hills; therefore, B4SH aims to treat everyone fairly, all the time. This then is mostly a policy to ensure that vulnerable customers **obtain** the same level of service, in practice, as that which is offered everyone else (but which they may be not making full use of or are unaware of) rather than a policy to detail specific practices only for vulnerable people.

B4SH will ensure that all staff are made aware of this policy.

### 2. Identifying Vulnerable Customers

The first step towards ensuring that vulnerable customers can access and make use of our services is identifying who is vulnerable.

There is no definitive list as to what constitutes a "vulnerable" customer, nor is a customer necessarily "vulnerable" or not: they may be vulnerable for a particular period of time, whether short or extended. Indicators of vulnerability include:

- age
- physical or learning disability
- physical or mental illness
- low literacy
- communications difficulties
- changes in circumstances such as bereavement
- being in payment arrears (Ofcom considers that being in payment arrears is a "likely" indicator of vulnerability)

**B4SH's aim is to make it as easy and convenient as possible for customers to notify us that they are vulnerable, but without unnecessarily disturbing all customers in an intrusive and unwanted way. If you would like to notify us that you or someone in your household is vulnerable, please email [office@b4sh.org.uk](mailto:office@b4sh.org.uk) or call us directly.**

B4SH will communicate our Vulnerable Customer Policy through our website and endeavour to issue such a communication on an annual basis endeavour to issue such a communication on an annual basis.

### 3. Routine services offered to vulnerable customers

Many of the services B4SH offer already to all customers have applicability to people who are vulnerable.

- a) **Telephone support** available 9-5 Monday to Friday. Calls answered by people whose first language is English, and who are not following a support script, but are able to help. If a customer requests that a telephone call is followed up in writing, staff will be happy to do so. We will follow up with an email to confirm the conversation and any actions discussed. Although unofficial, members of B4SH staff are often available outside of the normal business hours.
- b) **Text based near-realtime communication mediums**, including SMS and Whatsapp. These may aid anyone potentially vulnerable by reason of blindness/partial sight, or anyone who simply feels uncomfortable using the telephone.
- c) **Unfiltered Internet access** is provided. This may be used to access a 'relay service' should a customer's needs require this.
- d) **Third party management of invoices**. Through the B4SH accounts system a customer can elect to send invoices/DD collection notices to any email address. It is envisaged that this should enable a customer to choose to have their bills managed by an authorised third party of their choosing with minimal difficulty.
- e) **B4SH aims to respond to all enquiries within one working day**, and often responds within a matter of hours or minutes. As such, all customers should be able to expect "priority fault repair". B4SH owns its own network so this is kept to a minimum. In those cases where a fault lies with an external supplier's network or is caused by factors outside our control, B4SH is at the mercy of others' lead times for fault resolution. We publicise planned service outages on our website: [B4SH Network Status](#)
- f) **A 'human' accounts department**. If a customer is vulnerable by reason of experiencing financial difficulties, the accounts team will work with the customer to find a resolution.
- g) **British Sign Language Interpreter for Emergency Services**. Customers can access the 999 BSL Service via the website: [www.999bsl.co.uk](http://www.999bsl.co.uk) or via the [iOS or Android app](#).

#### 4. Empathetic customer service

B4SH will remind staff in customer-facing roles of the need to be patient and empathetic, and — in keeping with B4SH's compliance with GDPR — to ask for only the minimum information necessary to provide the service requested by the customer.

Where a customer finds themselves in a distressing situation, staff shall focus only on essential information that they need.

Where a customer's representative contacts B4SH on behalf of a customer, B4SH will require written permission from the customer to disclose any information.

If a customer indicates that they are facing debt issues, B4SH will — as with all customers — treat them fairly. B4SH will treat disconnection as a serious step to be used only as a last resort, but with the recognition that disconnection may be the consequence of a failure to pay for the service which B4SH is providing. If B4SH agrees to a repayment plan, the plan will be one which B4SH considers is reasonable in the circumstances and will be regularly reviewed. At all times the customer must in so far as possible keep us up to date with their circumstances.

#### 5. Record keeping

B4SH will record any information relating to a customer's needs relating to being vulnerable in the accounts system's notes section. These will only be visible to staff.

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Paragraph 4.17 of the Ofcom guidance: "We also encourage providers to do what they can to avoid vulnerable customers having to explain their personal circumstances each time they contact them, which could be frustrating and/or distressing."

If B4SH records information about a customer's vulnerability, the member of staff doing so will notify the customer that this is what they are doing. This is consistent with both GDPR and Ofcom's guidance.

B4SH's privacy notice is available here: [Privacy Policy](#)

#### **6. Monitoring the effectiveness of this policy**

B4SH will review the impact and effectiveness of this policy on an annual basis.

B4SH encourages any customer who has comments or feedback on this policy, or their experiences of dealing with B4SH as a vulnerable customer, to get in touch by a method of their preference.