

Vulnerable Customer Policy

Website Version

Statement

Trendsignal Limited is committed to identifying, assessing and managing vulnerable customers in accordance with our own defined objectives and policy, as well as any regulations and guidelines set out by our regulators. We aim to treat all customers, who we define as being vulnerable, in a fair, clear, and respectful manner.

We have implemented several identification and assessment tools within the procedure section of this document, aimed to identifying, assessing, and dealing with all Vulnerable Customer situations and to consistently ensure that our staff are aware of and knowledgeable about Vulnerable Customers, including how to handle certain situations.

Purpose

The purpose of this policy and procedure document is to identify and support vulnerable customers and to promote transparency and openness in all the business practices and processes that our staff create and engage in. It also defines the steps to be taken by all staff when dealing with a Vulnerable Customer situation.

Trendsignal Limited and its staff are committed to ensuring that all customers are treated in a fair and consistent manner, but also understand that some circumstances require additional interactions and/or steps to ensure that the customer is getting a product and service that is suitable and ethical.

Our staff are provided with training on what makes a customer vulnerable and how to identify, assess and deal with any vulnerability. We are committed to ensuring that any customer who has a relationship with our company, is treated in a fair, reasonable, and in a supportive manner.

Scope

This policy and procedure document relates to all staff within the organisation and has been created to ensure that staff deal with customers in accordance with legal, regulatory, contractual and business expectations and requirements.

Definition

The 2 main definitions of vulnerable customers as used by us are:

- a) Customers who are unable, for whatever reason, to make an informed decision at the time of dealing with them – customers falling into this category include those with language barriers, hearing difficulties, those with mental health issues, suffering from bereavement, learning

difficulties or the elderly. These customers may struggle to make a decision on whether the service or product you 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 you offer – these customers include anyone who is going to be put at detriment from taking up your offer. This could be financially if taking out a loan or setting up a payment plan causes them to add financial stresses.

The FCA defines a Vulnerable Customer as: –

“Someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when a firm is not acting with appropriate levels of care.”

The FCA notes four factors that can act as drivers to actual or potential vulnerability. These factors (and the examples provided) are non-exhaustive, but are referenced in this policy as part of our approach to vulnerable customer awareness and communication:

- Health – examples can include physical disability, chronic illness, visual/audio impairments, mental health issues, impaired mental capacity
- Life Events – examples can include caring responsibilities, bereavement, income/job reduction/loss, relationship issues, non-standard requirements (i.e. ex-offenders, refugees)
- Resilience – examples can include low/fluctuating income, debt, low/no savings, lack of support
- Capability – examples can include low knowledge/understanding/confidence in managing financial matters, poor literacy/numeracy skills, language barriers, learning impairments
- The FCA advised that because anyone can find themselves in vulnerable circumstances at any time, their guidance and rules apply to most firms who should be focusing on four main areas to achieve good outcomes for vulnerable customers: –
 - Understanding the needs of their target market and/or customer base.
 - Making sure staff have the right skills and capability to recognise and respond to the needs of vulnerable customers.
 - Responding to customer needs throughout the service
 - Monitoring and assessing whether they are meeting and responding to the needs of customers with characteristics of vulnerability and make improvements where this is not happening.

The Consumer Duty

Vulnerable Customer awareness goes hand in hand with treating customers fairly and ensuring adequate consumer protections. In accordance with the Consumer Duty, Trendsignal Limited has carried out an assessment of the nature and scale of characteristics of vulnerability that exist in our sector and within the target market we operate in.

Complying with the Consumer Duty requirements mean us going above and beyond considering generic customer vulnerabilities that are person or situation specific and also reviewing and monitoring vulnerabilities and characteristics that apply because of our target market. We have developed policies, controls and tools to comply with the Consumer Duty and specifically the requirements contained in PRIN 2A. Customer interests are considered from product/service design through to after-sales care and everywhere in between.

Trendsignal Limited aligns with the guidance for firms on the fair treatment of vulnerable consumers and aims to improve outcomes for customers in vulnerable circumstances. We are committed to ensuring that good outcomes are attainable for all customers, regardless of circumstance, situation or vulnerabilities.

The Equality Act 2010

In its aim to ensure adequate and fair customer protections, the Consumer Duty requires that the needs of customers in vulnerable circumstances and customers with protected characteristics under the Equality Act 2010 are considered. This includes developing and implementing policies, controls and tools that meet the needs of customers with protected characteristics, as defined by The Equality Act 2010.

The Company is aware that certain groups of customers may have, or be more likely to have, characteristics of vulnerability. These groups can often share a protected characteristic which could result in vulnerable circumstances. We continuously monitor the outcomes of all customers and review the associated management information on a regular basis.

Where there is a pattern or any evidence that customers that share a protected characteristic are more susceptible to experiencing harm from our products or services, we carry out an assessment and ensure that we are complying with both the Equality Act 2010 and the Consumer Duty.

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Objectives

We aim to: –

- Ensure that we have the suitable, relevant and compliant tools, controls and measures in place to identify, handle and monitor vulnerable customers.
- Have structured training and support tools to explain and guide in the vulnerable customer requirements.

- Train all staff on an annual basis in the identification, communication and understanding of what vulnerabilities are and how to approach them.
- Use assessment for all staff to ensure understanding and knowledge of vulnerabilities.
- Ensure that all materials, content and information are user-friendly, easy to understand and jargon free.

Controls and Measures

Vulnerable Awareness Review

Trendsignal Limited have identified and reviewed multiple factors that may pose harm or act as a barrier for vulnerable customers using our services and have developed measures and controls to reduce or eliminate the impact of these.

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 have reviewed and incorporated the FCA guidance on dealing with vulnerable customers and have used their accurately understand the drivers of vulnerability and the impact that being vulnerable can have on a person's ability to engage in consumer credit.

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.

Signposting

We are 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 actively tell customers where to obtain additional support as relevant to their situation.

If we identify a customer who may be in need of specialist advice which we are unable to offer we will refer them to, or we will seek guidance from an appropriate organisation such as:

- Mental Health Foundation <https://www.mentalhealth.org.uk>. Helping people understand, protect and sustain their mental health.
- MIND <https://www.mind.org.uk> Advice and support to empower anyone experiencing a mental health problem.
- National Debt Helpline <https://www.nationaldebtline.org> Free and confidential debt advice service run by the Money Advice Trust.
- Samaritans <https://www.samaritans.org> Providing emotional support to anyone in emotional distress.
- Step Change <https://www.stepchange.org> Expert debt advice and fee-free debt management.

- Alzheimers Society <https://www.alzheimers.org.uk> Information and support for people affected by dementia.
- The Royal National Institute of Blind People (RNIB) <https://www.rnib.org.uk> A leading sight loss charity and the largest community of blind and partially sighted people.
- Action on Hearing Loss <https://rnid.org.uk> The UK charity supporting deaf people and those with hearing loss and tinnitus.

Communications

We recognise that how we communicate with all customers, but especially those who are vulnerable, is essential ensuring good outcomes. All forms of communication are assessed to ensure that any potential vulnerabilities are taking into consideration.

We provide multiple communication methods and options and do not insist that one way only be used. An example of this is those who are suffering with depression or anxiety often cannot talk on the phone or interact socially, and so insisting on face to face or telephone communication would lead to additional harm to the customer.

We have ensured that all forms and methods of communication and information are presented in a way that is accessible and understandable for all customers.

Such methods include (but are not limited to): –

- o Website
- o Emails
- o SMS/Whatsapp
- o Marketing
- o Complaints Procedure
- o Point of Sale
- o Contracts/Agreements
- o After Sales/Post Contract Communication

Responsibilities

We will ensure that all staff are provided with the time, resources and support to learn, understand and implement the Vulnerable Customers procedures and associated policy into their business practices. Senior Management is responsible for a top-down approach and in ensuring that all staff are included.

Vulnerable Customer audits and gap analysis monitoring is carried out including subsequent reviews and action follow ups. There is a continuous audit trail of all Vulnerable Customer audits and feedback to ensure continuity through each process and task.