

### Ensuring You Treat Your Customers Fairly – Vulnerability

Following the recent update by the Financial Conduct Authority (FCA), ‘all regulated firms must be able to show consistently that the fair treatment of customers is at the heart of their business model.’<sup>1</sup>

Firms are responsible for ensuring all customers are treated fairly and the onus is entirely on the business to ensure that this is embedded across all their operational models. These rules have been designed with the consumer in mind and are necessary so that the public can be confident that fair treatment is central to a firm’s culture.

Above all, customers expect financial services and products which meet their needs from firms they can trust. Being able to operate in a trusting manner is particularly relevant when dealing with payment collection because there is the potential for customers within this audience to be classed as vulnerable.

So what does being vulnerable mean? The FCA state that ‘A vulnerable consumer is someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when a firm is not acting with appropriate level of care.’<sup>2</sup>

#### **There are many different situations which can trigger vulnerability. Some examples include:**

- Stress in the debt market
- Reduced or interrupted income due to loss of work (through illness or other factors)
- Mental illness or disability
- Literacy issues
- Being a carer

It should be remembered that being vulnerable can come in a variety of guises. It can be temporary, sporadic or permanent. Because of this fluidity, businesses must respond by having operational models which are flexible and can be tailored to fit with each individual situation they encounter.

The FCA expects firms to be able to respond as they have the power and capacity to create good outcomes for their customers. Firms can develop strategies and manage payment interactions well, which is good for the customer and can be commercially beneficial for the business.

### How Paytel Solutions can help

An area of interaction with a vulnerable consumer can often be discovered during the payment process. Consumers need to be given the option to pay via a method of their choice. For example, payment over the telephone still remains a preferred payment method for many consumers. Staff handling the calls can often identify potential changes of circumstances during the payment call and it is important that the appropriate processes are in place, so colleagues know what to do next.

Paytel Solutions designs, develops and deploys a complete range of fully hosted and fully compliant PCI DSS telephone payment solutions. Developed and designed in-house, and with security and ease of use at the forefront of the design, automated IVR and live call solutions are built to improve contact centre efficiencies and enhance customer experiences.

**Particularly key is that firms benefit from the full control over the telephony solution right from the outset.**

This helps them ensure that a consistent approach is embedded across all operations. It is necessary for firms to have an in-depth understanding of the regulation and Paytel Solutions develops close working relationships with every client to ensure a flexible, individual solution is developed and implemented. Paytel Solutions appreciates and understands the range of operational considerations a firm faces and unlike many other providers, makes no attempt to force an organisation down a particular operating route. In the same way each customer is unique, so is each firm and the challenges it faces.

Firms can begin by auditing their current practises and reviewing their high level policy on consumer vulnerability. Key to this will be to assess if the staff who deal with customers on the 'front line' have sufficient training to be able to identify if a customer is vulnerable and if so, what the process is for handling the call. Is the customer then referred on to a specialist team who have the authority to make flexible decisions? Paytel Solutions can route customers consistent with their data indicator on vulnerable. This develops a smooth customer journey process and ultimately delivers better quality customer service and stimulates the firm to operate in a more efficient and effective manner.

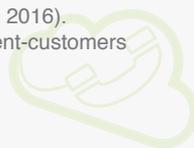
An audit is only the beginning of the process. There needs to be an ongoing evaluation of the customer vulnerability strategy at regular intervals to ensure that the strategy is effective. Operating an effective payment strategy has benefits to consumers and businesses. Ultimately consumers must have confidence and trust in the firms they transact payments with.



**To discuss how Paytel Solutions can help you achieve operational efficiencies and improve customer service, contact us on 0333 202 1555, or email [enquiries@paytelsolutions.com](mailto:enquiries@paytelsolutions.com)**

<sup>1</sup> *Fair Treatment of Customers*, (Financial Conduct Authority, 2016).  
Available from: <https://www.the-fca.org.uk/firms/fair-treatment-customers>

<sup>2</sup> *Ibid*



### About Paytel Solutions

Paytel Solutions designs, develops and deploys a complete range of fully hosted PCI DSS telephone payment solutions. With security and ease of use at the forefront of our designs, our accredited platforms use Automated IVR, Live or Bespoke Solutions to streamline your contact centre processes and meet your collections' targets. Paytel Solutions is a trading style of BCH Digital Ltd.