

Telefónica UK Policy

Accessibility and Vulnerable Customers

Introduction

It's crucial we support customers who may be vulnerable or have a disability that requires specific service needs. By identifying them, we can use our operating procedures to make sure they receive a consistent approach that takes account of their particular circumstances and meets their particular needs.

Objective

The purpose of this policy is to demonstrate how TUK is meeting its legal and regulatory obligations around accessibility and vulnerability and delivering the vulnerable customer outcomes detailed below.

TUK obligations

TUK has general and specific obligations relating to customers with disabilities and those in vulnerable situations:

- **OFCOM:** General Conditions of Entitlement Condition C5 – Measures to meet the needs of vulnerable consumers and end users with disabilities.
- **FCA:** Requires firms to identify and support customers who are unable to make an informed decision at a specific point in time.
- **Equality Act 2010:** All services must be accessible for persons with disabilities

Definitions and interpretations

FCA definition:

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 levels of care.

Defining vulnerability – The Three Cs:

There are different types of vulnerability, and underlying situations where customers may experience varying degrees of vulnerability. These have been grouped into three key headings:

- **Channel & Access:** things like hearing, sight, language barriers and physical disability
- **Comprehension:** things like mental capacity, low financial understanding and issues relating to old age such as dementia
- **Circumstances:** things like child birth, those suffering bereavement, family breakdown, illness or financial difficulties

This policy combines accessibility and vulnerability but acknowledges that a customer can have a disability and not be vulnerable or can be considered vulnerable without having a disability.

Vulnerable customer outcomes

There are a number of preferred outcomes for vulnerable customers as defined in the FCA Occasional Paper 8. This policy is aligned to delivering these outcomes:

- **Communication:** There is a choice of ways for customers to communicate
- **Tailored Approach:** Customers are treated as individuals, with tailored responses according to their circumstances
- **Judgement:** Staff have the authority and discretion to offer flexible solutions and outcomes where appropriate
- **Fair Disclosure & Information Usage:** Customers are encouraged to be open and honest, safe in the knowledge that the information they give will only be used in their best interests
- **Tell Once:** Information regarding customers circumstances is recorded properly to prevent them having to repeat themselves
- **Carers:** Carers for vulnerable customers are treated with respect and their concerns noted while data security is maintained
- **Third Parties:** There is consistent and fair treatment of recently bereaved, or those acting with Power of Attorney or a third party mandate

Education and training

TUK is committed to acting professionally, fairly and with integrity. TUK mandate specific training modules for employees, temporary workers and work package staff to ensure they are aware of Laws, Regulations and local policies that impact their day-to-day work. The Compliance Training Policy outlines the mandatory training that's required to be undertaken, and by whom. The CBT below relates specifically to accessibility and identifying and supporting vulnerable customers.

Disability Awareness & Vulnerable Customers Training:

This computer-based training is completed within four weeks of joining and then every two years.

Who: All employees (including franchise and outsource partners) who:

- i) are customer facing;
- ii) are responsible for the delivery, supervision and management of customer products and services; and
- iii) deliver back office functions that support customer products and services related activities.

Disability information for employees:

Our internal intranet contains lots of useful information and processes to help front line employees support disabled customers and those in vulnerable situations including:

- How to register customers for our 'Access For You' service and how to support customers who are already registered
- Mandatory services as prescribed by Ofcom
- Information on the different types of disability
- Etiquette and tips for communicating clearly
- Examples of adjustments we can make to give our disabled customers a better experience
- Information about how we can support customers with:
 - Visual impairments
 - Hearing impairments
 - Mobility or dexterity problems
 - Learning difficulties
- Services available from O2

Our front line employees can contact the Access For You support team for advice on what adjustments can be made to support disabled or vulnerable customers if they're unsure on the best approach. This team have received additional specialist training and can help front line employees support customers who need it.

Access For You

We offer a range of services to help make customers lives easier. Details of these services and how to use them are available to customers and employees on our website. Services include:

- **Access For You service:** Customers who find it difficult to access our services due to a disability or personal situation can register for this service. Once registered, this is added to the customer's account together with information in the notes about their specific needs. This gives our front line customer service agents the heads up that adjustments may be required to support the customer. This will negate the need for the customer to tell us each time they contact us.
 - Consent must always be obtained from the customer before registering them for this services
 - Data about the customer's requirements are stored securely in line with our strict data securities policies and procedures
- **Alternative formats:** Providing contracts, mobile phone bills and other documents in Braille, large print or audio free of charge upon request.
- **British Sign Language (BSL):** Users can get in touch with a customer service advisor at O2 by using the SignVideo service.
- **Next Generation Text Service (NGTS):** Provide text-to-voice and voice-to-text translation for customers.
- **Directory enquiries:** Customers who are unable to read or hold a telephone directory due to illness or disability can apply for free directory assistance and information by calling BT Directory Assistance on 195.
- **Getting in touch:** This includes details of the different ways customers can get in touch with us such as phone, online (Live Chat), in writing and by visiting an O2 store.
- **Understanding bills:** Provides details of the different ways customers can access their billing and account information and how to get help.

Mobile devices

We have a broad range of devices that can be customised with accessibility features and settings to suit the individual needs of customers with disabilities. On top of this, we support the Global Accessibility Reporting Initiative (GARI) which provides information about the accessibility features available on a wide range of mobile phones. We may not stock all the phones listed on the site, but if a customer knows the features they need, we will do our best to help them find a similar device.

Bereavement and Power of Attorney (POA)

TUK has a ring-fenced team dedicated to supporting bereaving customers, those who have been diagnosed with a terminal illness and POA's. The team take inbound calls from front line customer service advisors (CSAs) and calls directly from customers who have previously been given the number or have been transferred by front line CSAs, they also process emails/faxes and correspondence with POAs.

Arrears management

TUK has a collections process in place to make sure customers who are unable to make payments are treated fairly. TUK arrears management is aligned to the following principles:

- Treating customers as individuals
- Contact customers at the earliest opportunity
- Being aware of potential customer vulnerability
- Focusing on achieving the best outcomes for the customer

All customers in financial difficulties or those who have special circumstances are dealt with by a dedicated payment management team. Their circumstances are assessed and they're provided with relevant solutions. All customers who fall behind on their payments are also proactively signposted to free debt advice.

The Telefonica UK Credit & Collections Policy details the processes and procedures for how TUK supports customers who are unable to make payments to their monthly contractual obligations. This includes the credit and collections framework, the options available to customers, and the rules in respect of treating every customer in arrears or default fairly.

Contacting O2

There are a number of different ways to contact us, including specialist services for customers with disabilities. These include:

- Over the phone
- Online using Live Chat
- Writing to us
- Next Generation Text Service (NGTS) for those who are deaf, hard of hearing or speech impaired
- SignVideo interpreting service for British Sign Language (BSL) users

Experience within store

All O2 stores are designed and arranged to be accessible for everyone, including those with disabilities. When visiting an O2 store customers can:

- Use a hearing loop
- Ask for somewhere to sit down
- Ask us to read information out, or write explanations down
- Get help filling in forms
- Ask for help setting up a phone
- Book time with an in-store Guru

Complaints handling

TUK has a dedicated Complaint Review Service (CRS) to ensure that fair outcomes are provided for customers who have made an expression of dissatisfaction. The TUK complaints processes are documented in the Complaints Handling Manual which includes a section on identifying vulnerable customers together with practical tips on how they should be managed.

Policy adherence

Adherence to the procedures set out in this policy are monitored and measured through the following:

- Quality monitoring (includes adherence to the requirements of Ofcom Condition 5)
- Complaints and root cause analysis
- Advisor and customer feedback
- Queries into second line support Access For You team