Improving support and services for Vulnerable Customers

01 November 2023

Who are Davies?

Davies

Davies is a multi-award winning specialist professional services and technology partner to global insurance and highly regulated businesses

>7,000
Global staff

>1,700
Clients supported

Davies UK&I

>3,700
staff throughout the UK and Ireland

- Cross class third party administration
- Full claims fulfilment and supply chain
- Fraud detection and investigation
- Subrogated recoveries
- Litigation handling
- Policy wording and coverage advice
- Claims and litigation performance benchmarking

Davies North America

>1,800
staff and 10,000 field resources across all 50 states

- Cross class third party administration
- Daily and CAT field adjusting
- Underwriting inspections
- Subrogated recoveries
- Actuarial consulting
- P&C and A&H audit
- Claims SaaS and technology consulting

Davies Global

>1,300
staff dispersed around the globe

- Captive set-up and management
- Syndicate, MGA and Intermediary launch and host
- Credit control and bordereau processing
- Operations and transformation consulting
- Financial crime and regulatory compliance
- Data insights and analytics
- Talent acquisition and development

Our Group Customer Experience services

Davies

Enhancing Digital CX Experiences

- Intelligent automation
- Digital and omni-channel experiences
- Legacy modernisation
- SaaS solutions – VoC; KYC; AML; RegTech; Complaints; Training & Competence

Improving Regulatory Compliance

- Maintain regulatory inventory
- Improve control systems
- Compliance operating model optimisation
- Pre/post audit support
- GRC systems implementation
- Regulatory reporting and analytics
- Remediate compliance issues

Leadership, Talent and Cultural Transformation

- Professional education
- Talent development strategy
- Bespoke learning programmes – Leadership, Operations, Change
- Cultural transformation & leadership development
- Employee experience platform to promote wellness, engagement & retention

Reducing Risk from Financial Crime

- Threat and capability assessment and transformation
- KYC, AML, sanctions and fraud advisory and improvement
- Data analytics for financial crime
- Technology selection and optimisation
- Resourcing to remediate KYC, AML and Fraud

Improving and Scaling CX Operations

- Performance benchmarking and improvement
- Operating model optimisation
- Operational resilience
- Outsourcing optimisation
- Operational transformation
- Capability development

## Building Insights that Improve Performance

- Data strategy assessment and development
- MI/BI reporting services
- Speech and text analytics services – Operations, CX, Omni-channel and Risk
- Managed analytics services
- Analytics technology selection and optimisation

Sourcing Talent

- Executive and specialist recruitment
- Resourcing solutions for transformation, finance, compliance and remediation of regulatory issues
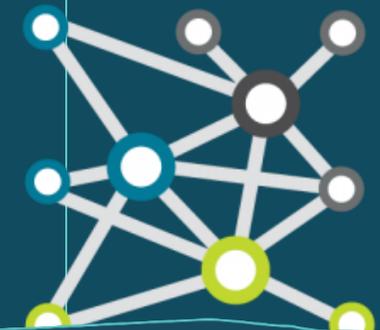
Cross sector innovation in CX

Davies

Advise brands on how to
optimise their operating model

Get move value from outsource
service relationships

Create and manage insights capability
that drives continuous improvement

Developing strategies and the
capability to support retention
and growth

Developing people to deliver
great performance and
customer outcomes

Helping client remediate
complaints and financial crime
backlogs and removing root causes

Build and run digital solutions that
lower costs and deliver a great CX

Develop and run intelligent automation
to optimise costs and improve CX

Benchmark and improve omni-channel
customer operations

Why this matters!

The challenge on a page!

Customers are demonstrating increased vulnerability which needs to be accommodated...

~1.4 million

UK individuals with dementia in 2025

47%

UK population with some vulnerability

~9 million

UK population unable to use the Internet

80%

Rank phone as their preferred channel

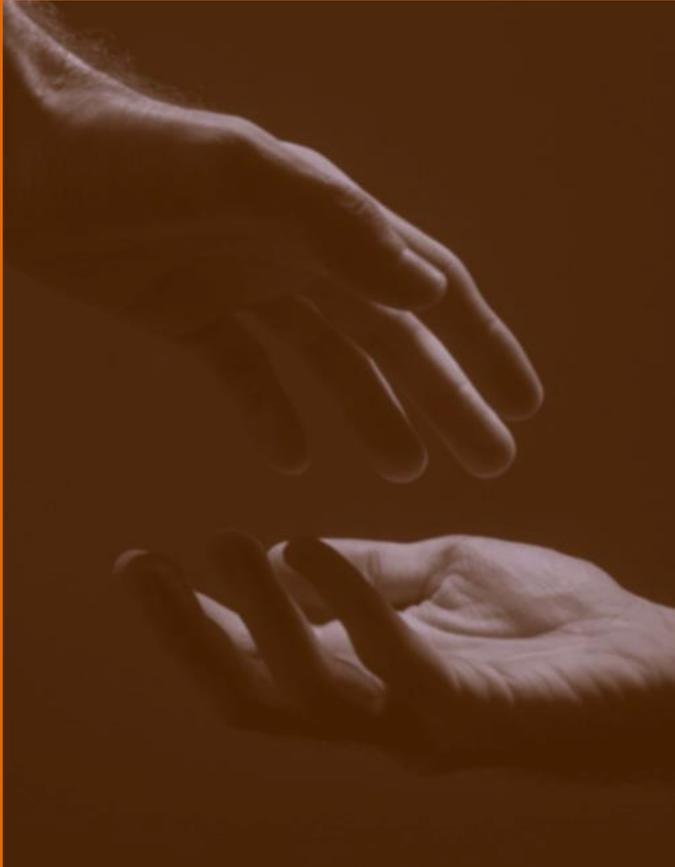*All customers* need to be accommodated: **one size will <u>not</u> fit all**

How did I get here?

WHITE PAPER

Davies

Building a resilient customer experience for vulnerable customers

The moral, legal and commercial drivers behind creating an improved customer experience (CX)

davies-group.com/consulting

in Davies Consulting

The vulnerability gap

- The gap between the advantaged and disadvantaged is growing

- The optimism for wellbeing outcomes is reducing since 2020

- Organisations are ignoring the needs of the more vulnerable

- What should organisations do about this?

Vulnerable customers

"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."

Source: FCA

4 key factors leading to customers becoming VULNERABLE

- Poor health

- Low resilience (financial & emotional)

- Recent negative life events

- Poor capability

VULNERABLE
Customers

22% of people in the UK* live in low-income households

*Around 14 million people

Source: Consumer Vulnerability: challenges and potential solutions, UK Gov

Henley Business School

CUSTOMERS ON
Low incomes

Constrained finances and aversion to risks

Higher risk of indebtedness leading to reduced deals

Less likely to have access to important enabling products

Pay more for the same goods and services than high income consumers

VULNERABLE
Customers

22% of people in the UK report having some form of disability

*Around 14 million people

Source: Consumer Vulnerability: challenges and potential solutions, UK Gov

CUSTOMERS WITH
Physical disabilities

Disabled people in the UK

The Disability Price Tag

+£

Extra costs due to impairment or condition

The Digital Divide

20% have not accessed online content, in contrast to just 5% of adults without disabilities

■ Children ■ Working age adults ■ Over 65

Source: Consumer Vulnerability: challenges and potential solutions, UK Gov
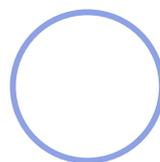
OLDER
Customers

Some older people face challenges when navigating markets due to health conditions

Digital exclusion and limited digital capabilities creates barriers

47% of people aged 75+ do not use the internet

% of UK adults that display characteristics of vulnerability

69%

77%

Aged 75+

Aged 85+
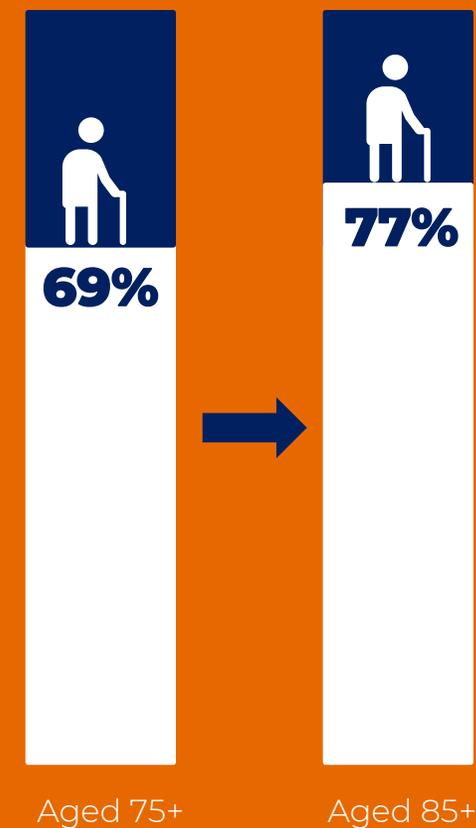
What can
companies do?
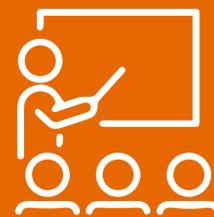
Understand vulnerable customers
& their needs

1. Understand them

1. Understand vulnerable customers
& their needs

1. Understand them

Who are you vulnerable customers?

- Ask them

- Analyse internal data

- Ask front line staff

- Monitor response to meeting their needs, and assess where improvements could be made

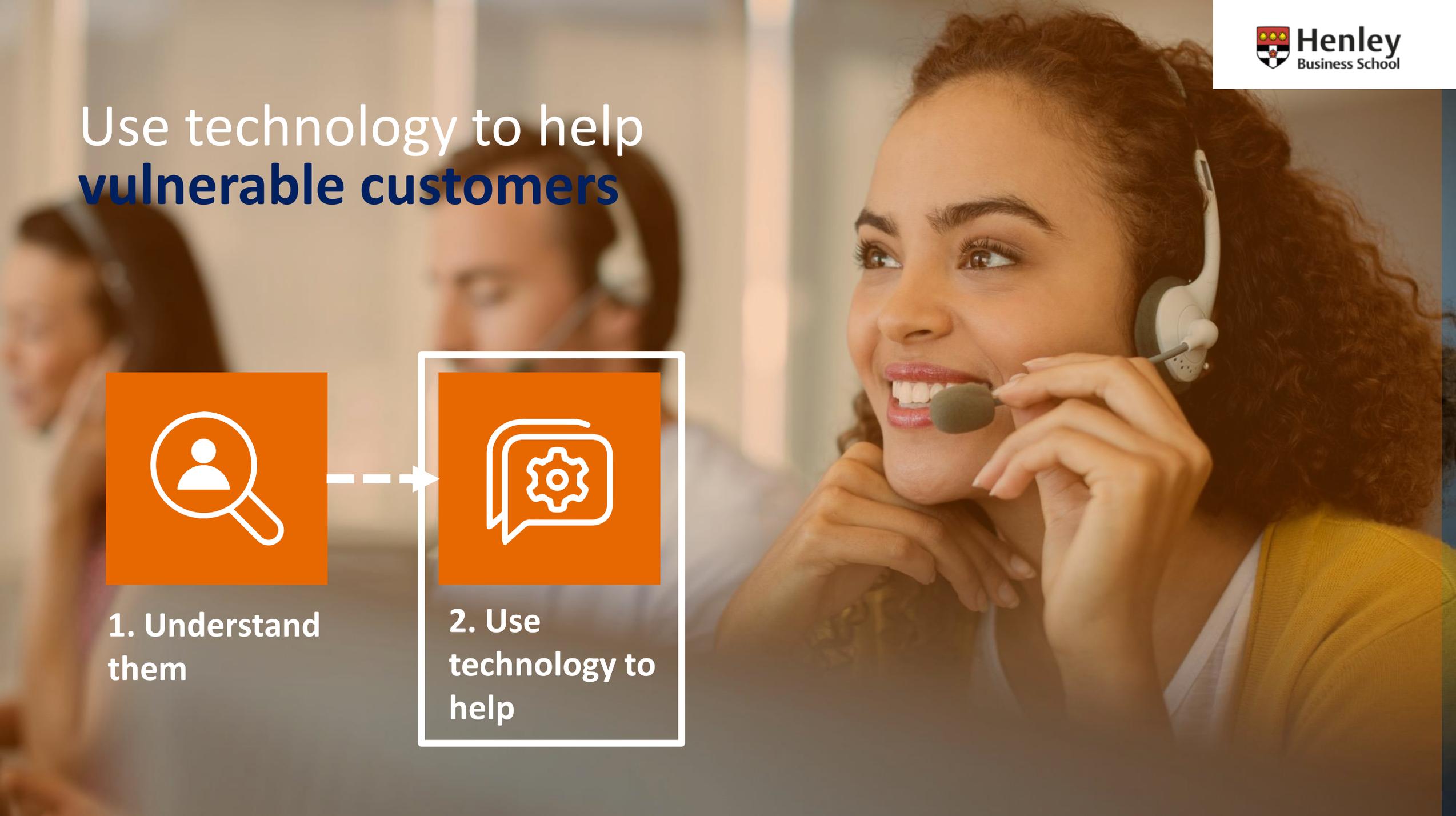Design better products/services and CX to alleviate problems for customers

Use technology to help **vulnerable customers**

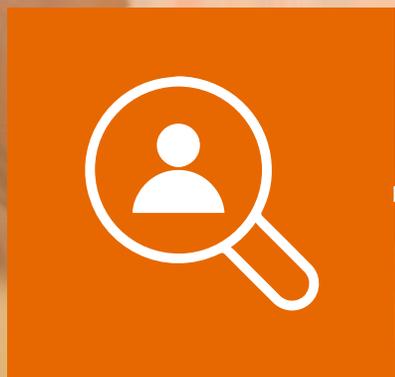1. Understand them

2. Use technology to help

Henley Business School

2. Use technology to help
vulnerable customers

- **Identify vulnerable customers** i.e. through software for voice analytics or through text and then provide help to staff about how to deal with these situations

- **Automate tasks** to improve the CX – use technology to make it 'easy' to be a customer – reduce the pain points

- **Free up staff time** to help vulnerable customers

- Ask customers questions!

- **Report and monitor** staff performance in dealing with vulnerable customers

2. Use technology to help

Empower and upskill staff
to deal with vulnerable customers

Henley Business School

1. Understand them

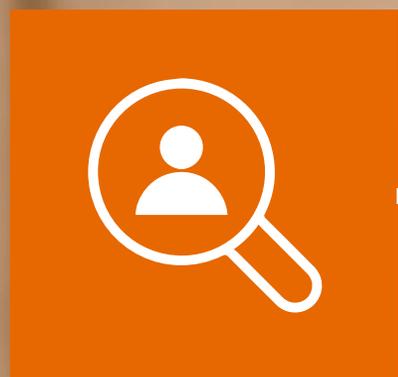**2. Use technology to help**

3. Empower staff

3. Empower and upskill your staff
to deal with vulnerable customers

3. Empower staff

- Training and development are essential to help staff with difficult situations – use role playing or share real life experiences

- Empower them to do the right thing for the customer - let them make adjustments for vulnerable customers in ways they think are appropriate

- Maybe incentivise staff for the provision of excellent CX when dealing with vulnerable customers

Develop an organizational climate that treats vulnerable customers fairly

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1. Understand them

2. Use technology to help

3. Empower staff

4. Create a climate of fairness

4. Develop an organizational climate
that treats vulnerable customers fairly

4. Create a climate of fairness

- Senior managers need to ensure that everyone understands what is expected of them. Appoint vulnerability 'champions' to promote these messages internally

- Policies and practice should be clear but also grounded in evidence activity. No virtue signalling wish lists (They are seen through)

- Senior managers should be aware of the challenges that staff face in remote working

- Use data to show staff the reality of vulnerable customers

In summary

1. Understand them

2. Use technology to help

3. Empower staff

4. Create a climate of fairness

Alzheimer's Society

1	What is dementia?
2	The scale of the challenge
3	The challenges as customers
4	Barriers to supporting customers with dementia
5	Examples of providing support and inclusion
6	Where next for you and your business?
7	Insurance United Against Dementia
8	Contacts
9	Close

What is dementia?

"
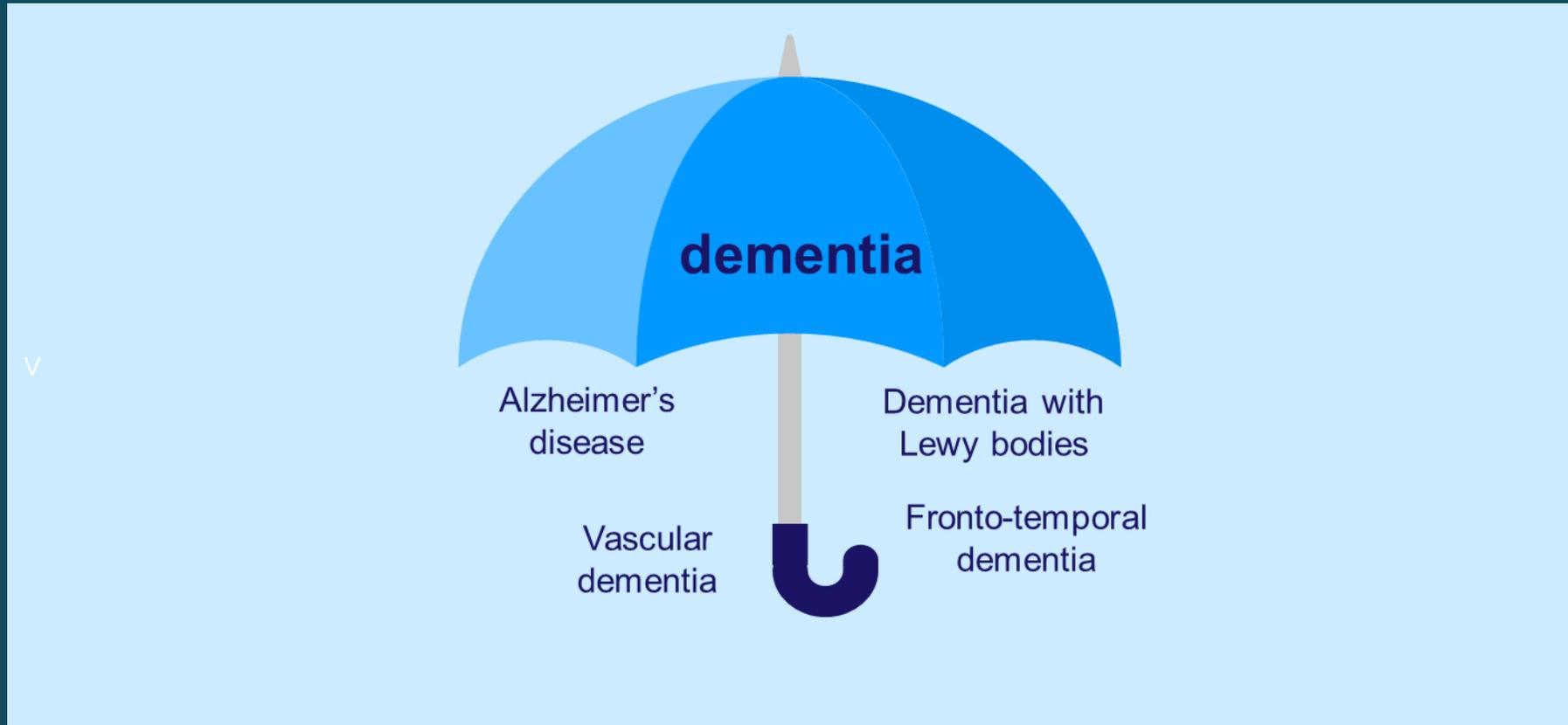
What challenges do you face when supporting customers with dementia?

A person with dementia might…

- Have problems with their day-to-day memory

- Have difficulties making decisions or carrying out a sequence of tasks

- Have language problems, including difficulty following a conversation or finding the right word

- Have problems with mobility and visuo-perceptual difficulties

- Show changes in their mood or behaviour

People affected by dementia tell us...

"They asked my wife her date of birth. She couldn't remember, I whispered it to her, and the call cut off"

"When you go to a counter you are slower and have to think of your words. The teller might say they don't know what you are talking about"

"I agree that the red tape is a necessary protection, but with the next of kin it should be made easier" (Carer of person living with dementia)

I hate to see carers struggling to get access to services they need to support their loved ones, but unless they jump through the right hoops, there's nothing I can do, it's protocol.

I've always managed my own money, but now between all the confusing information bank's processes I've started hitting barriers. I'd like to tell my bank about my needs, but I worry they'd take away my financial independence.
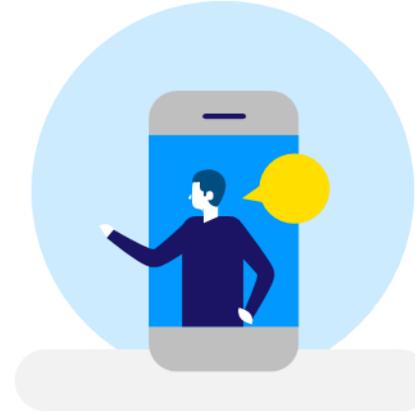
Supporting customers affected by dementia

- People

- Process

- Places

Davies

"

What are the barriers to dealing with some of these challenges?

Where to go from here?

- Partner with us – development, partnerships, start change, media, policy, influencing
- Support Line
- Local support in communities

Strategic change for people living with dementia

Thank you

Laura Clark
Senior Corporate Development Manager
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Chris Park
Development Board Lead
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Helen Lord

CEO, Vulnerability Registration Service

Easing the pain of vulnerability identification for individuals and organisations

Regulatory landscape

- **All sectors are under regulatory pressure to revise and focus vulnerable customer management**

- All firms authorised by the **Financial Conduct Authority** have been required to comply with **Consumer Duty** since 31st July 2022 – Consumer Duty specifically requires firms to utilise the knowledge they know about consumers (or could reasonably expect to know) to focus on customer outcomes and it acknowledges that vulnerable customers will have specific needs

- The FCA's **Credit Information Market Study** report is scheduled to be published Q3 2023. This has a focus on sharing vulnerability data. Our discussions with the FCA have highlighted to them that the VRS is an existing and independent solution to centralised data sharing. Conversations with the **Financial Ombudsman Service** led to an informal agreement that they would introduce Vulnerability Registration Service into their complaints handling process at a future date. This is likely to be volume-driven

- **Ofgem** and **Ofwat** are requiring increased focus energy and network providers to populate and share the Priority Services Register, identify and act on vulnerability in relation to their customers more effectively, particularly in relation to Pre-payment Meters and discounted tariffs. It is also expected that they use available sources to identify vulnerability. **Ofwat** are currently developing revised vulnerability guidance. **Ofgem** has draft **Consumer Vulnerability Guidance 2025**

- The Department for Digital, Culture, Media and Sport has issued a government white paper **High Stakes: gambling reform for the digital age** which is now the focus of on-line gaming companies – wider data sharing is being actively encouraged. The **Gambling Commission** has issued a **vulnerability statement**

- The **UK Regulator's Network** has issued a joint letter from the **FCA, Ofcom, Ofwat and Ofgem** setting out how they expect organisations in their sectors to manage customers in financial difficulty

- Central government are increasingly seeking to use the **Digital Economy Act** as a vehicle to promote data sharing in relation to debt and VRS is engaged in discussions relating to the use of VRS

- The **Information Commissioner's Office** has been consulted by VRS in relation to the legal bases for sharing vulnerability data and no obstacles have been identified.

Vulnerability Registration Service

To provide consumers with **one route** to alert service providers to their vulnerabilities – whether that be financial, circumstantial, accessibility or health-related
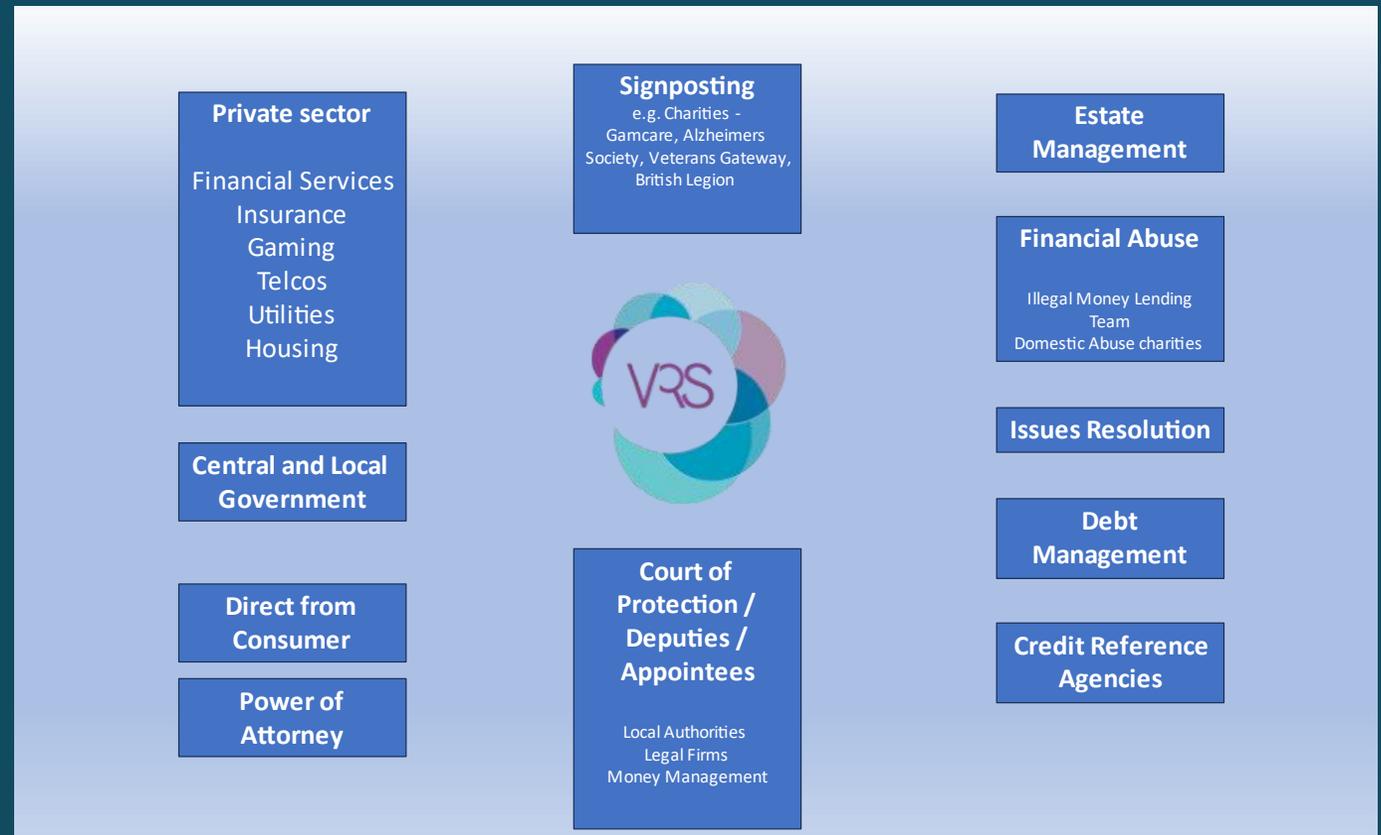
To create a data hub which enables service providers, charities, government to proactively reach out to individuals in vulnerable circumstances to extend the support they are entitled to

Data Acquisition

VRS data is acquired from a variety of disparate sources founded on awareness and relationship-building with broad potential for growth

The model shows the various sources of data that are either actively providing information or awaiting final agreement or contract sign-off. In addition, we hold IVAs, bankruptcies and debt relief orders

Private sector

Financial Services
Insurance
Gaming
Telcos
Utilities
Housing

Central and Local Government

Direct from Consumer

Power of Attorney

Signposting
e.g. Charities - Gamcare, Alzheimers Society, Veterans Gateway, British Legion

Court of Protection / Deputies / Appointees

Local Authorities
Legal Firms
Money Management

Estate Management

Financial Abuse

Illegal Money Lending Team
Domestic Abuse charities

Issues Resolution

Debt Management

Credit Reference Agencies

Vulnerability sub-flags

Life event

Mental health

Financial capacity

Physical health

Cognitive disorder

Financial difficulty

Coronavirus

Deceased

Physical disability

Risk of Coercion

Accessibility

Debt Management Programme

Individual Voluntary Arrangement

Gambling addiction

Bankruptcy

Debt Relief Order

Sight-Blind

Dyslexia

Hearing-Deaf

Low level of Literacy

Low level of numeracy

Loneliness/ isolation

Addiction to alcohol or drugs

Limited Technological Capability

Sight-Partially sighted

Old age

Victim of Fraud

Hearing-Partially Deaf

Vulnerability 'categories'

Financial Resilience

- Financial hardship
- Financial capability
- Debt Management Programme
- Insolvency

Life events

- Bereavement
- Relationship breakdown
- Economic abuse
- Victim of Fraud
- Loneliness / isolation

Health

- Physical health
- Physical disability
- Mental health
- Cognitive impairment
- Addiction
- Old age

Accessibility

- Visual impairment
- Hearing impairment
- Limited technical ability
- Dyslexia
- Low level of numeracy or literacy

Mark Bailey

Director & Co-Founder
Collaboration Network

Vulnerability: Why it Matters

The home of cross sector collaboration, bringing organisations together to better support customers, colleagues and to meet regulatory requirements.

Together, we can go further.

Collaboration **Network**

Who we are working with

A scaling problem

- 5.6m people missed 3 or more bill payments in H2 2022 – up by 1/3*

- 3 x more likely if you have a mental health problem**

- 3 x more likely if you are disabled***

- 72% of UK Adults see domestic bills as an increasing burden*

- 21% are unable to cope**

- 33% of mortgages and rents increased in previous 6 months to Jan 23*

*FCA Financial Lives Jan 23
**Money and Mental Health Breaking the Cycle June 23
*** RIDC Sept 23

How are organisations approaching this?

We have a champion!   **Customer Services take ownership**   **Vulnerability focused working groups**

Persona

Bill

- White, 54, good general health

- Higher rate tax payer

- Outstanding credit record

- Mortgage, loans, insurances, subscriptions, brand purchaser, multiple holidays, eats out

Lived experience

Bill

- Going through a divorce

- Depression & Suicide Ideation

- Moving house

- LFL 5 year mortgage + £18,000 pa

- Family member diagnosed with cancer

What you can do (this is not exclusive!)

- Map and test your customer journeys – focus on ease and language

- Get the board involved

- Training and purpose for customer agents … and support

- Incorporate lived experience

- Design inclusive products and services

- Build strong relationships with trusted third parties (and pay for it!)

What we are doing

- Extra Support Clubs

- Case study led training workshops

- Incorporate lived experience

- Vulnerability Champions Group

- COLC Research project

- Vulnerability Summit 20 June 2024

- Vulnerability week 18-22 June 2024

Final thought

Why is your organisation now thinking about vulnerable customers?

- Regulatory pressure?

- To sell more products and services?

- To make an improvement to people's lives

People won't remember what you say, or even why they

contacted you – but they will remember how you make them feel

www.collaborationnetwork.co.uk

Together, we can go further

Join us or follow us on LinkedIn for updates

Chris Parry

Product Specialist – Consumer Promise and IoT Practices

Overview of ISO22458, a framework to demonstrate effective accessibility for all customers

Around the world, BSI enables businesses like yours to turn best practices into habits of excellence.

84,000 clients in **193** countries

50% of the Fortune 500

84% of the FTSE 100

81% of the Nikkei 225 Index

23 of the Top 25 medical device manufacturers certified

50% of the Top 100 on Glassdoor's Best Places to Work

We are a purpose-driven business focused on Organizational Resilience.

- We work for the public good to improve, standardize and simplify business systems
- Profit is reinvested back into BSI and never distributed
- We are independent from outside influence

By Royal Charter

The BSI Kitemark - Awareness

73% of business leaders **recognise** the BSI Kitemark

Over 1 in 2 UK consumers **recognise** the BSI Kitemark

87% of consumers are **willing to pay more** for a product/service displaying the Kitemark

95% of consumers are **more likely to buy** a product if it has a Kitemark

84% of consumers believe the Kitemark **should be more visible** on products/services

"Kitemark certification symbolizes quality, safety and reliability. It gives our customers confidence and reassurance — and an additional reason to choose our products over our competitors"

PETER LITTLETON, TECHNICAL DIRECTOR, CHRISTEYNS FOOD HYGIENE

"Our customers, whether individual consumers or business buyers, are reassured by the BSI brand, which is so well-known and respected. They know they are purchasing well made products they can trust."

STUART MCCAFFERTY, COMPLIANCE MANAGER, SPECSAVERS

"If a product has a BSI Kitemark, then it is safe to be in my house"

ANON, BEDFORD

"BSI Kitemark means it's been tried and tested and is safe for use by myself and my family"

ANON, KENT

BS 18477 – Inclusive Service Verification

- Encourage adoption of fair, ethical and inclusive practices

- Demonstrate best practice in identification and treatment of vulnerable consumers

- Help understand consumers rights

- Improve accessibility to services for all

- Increase consumer confidence

ISO 22458 – Inclusive Service Standard

- Enhancement of clauses and addition of A.I.

- Organizational commitment – principles & strategy

- Inclusive design

- Resources to support service delivery

- Identifying Consumer Vulnerability

- Responding to Consumer Vulnerability

- Monitoring Evaluation & improvement

BS ISO 22458:2022

BSI Standards Publication

Consumer vulnerability - Requirements and guidelines for the design and delivery of inclusive service

bsi.
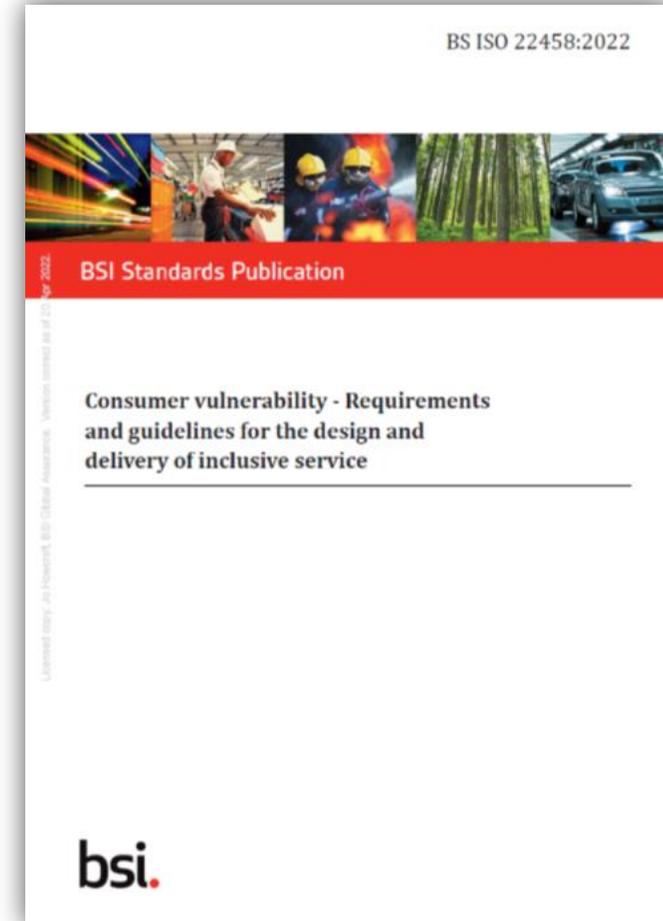
Sector Specific Kitemark

- Energy
- Water
- Finance
- General

Inclusive Service Kitemark™ - Currently certified

A further 22 clients in application status currently - (as of Oct 2023)

FCA – Consumer Duty

- The BS ISO 22458:2022 is closely aligned to the FCA guidance on the fair treatment of vulnerable consumers fg21-1. This means it can be readily used as a tool to identify organizational gaps in consumer protection and support the development of robust improvement plans.

- As with the FCA guidance, BS ISO 22458 requires organizations to demonstrate a clear commitment to improving outcomes for consumers in vulnerable situations and to minimize harm. This commitment will be led from senior management and deeply embedded within the organization through continual engagement and communication with all employees

- BS ISO 22458 requires that organizations have implemented strategies, processes and procedures to provide inclusive and accessible services and the BSI Kitemark™ assesses and measures the effectiveness of these in day-to-day operations. This includes understanding the needs of their consumers so that the design and delivery of products and services are inclusive to all, as well as the development of policies which detail good practice when selling to consumers. Staff training provided to properly identify risk factors and behaviours of those who may need extra support and how to respond appropriately to better support customers in vulnerable situations.

- Lastly, management of information to ensure that an organization can evidence they are monitoring, assessing, listening to feedback from their consumers and employees to ensure improvements are made continually.

- As with the FCA Guidance fg21-1, the BSI Kitemark™ requires organizations to demonstrate how their business model, the actions they have taken, and their culture ensures the fair treatment of all customers including those in vulnerable situations.

BS ISO 22458:2022 BSI Kitemark for Inclusive Service

Benefits

- **Increased accessibility**
- **Compliance**
- **Strengthen skills**
- **Brand protection and trust**

Want to find out more

Contact our BSI Kitemark for Inclusive Service experts

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Find out more at: **bsigroup.com/inclusive-service-uk**

Julie Walker Global Scheme Manager, Inclusive Services -
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Consulting Director
Davies

Wider industry developments

Improving experiences for vulnerable customers

Delivering success using speech analytics technology to streamline and improve a water supplier's tariff for vulnerable customers

Improving a water supplier's tariff for vulnerable customers

Davies delivered streamlined services for vulnerable customers supported by speech technology analysis

Situation:
- Supplier provides 2 essential services (drinking water and wastewater management
- A complaint on a new social tariff designed for vulnerable customers identified a gap
- A review of all complaints revealed the service was disjointed and customer waiting too long to be put on the tariff
- Recuring issues in the set of vulnerable customers on the social tariff
- 14 days to investigate cases

Key stats:
3m customers

1.4m home and businesses

3000 employees

26,500km water maintained

How Davies helped:
- Using speech analytics to identify language consistent with the specific tariff
- Identified agents following incorrect processes
- Actions created to deliver a streamlined process to ensure vulnerable customers had a frictionless journey

Results
1 Day to analyse and investigate priority cases

Analysis and improvements led to reductions in average handle time, chase contacts, and written and non-written complaints

davies-group.com

Finding the right approach to support vulnerable customers

Davies

> Davies created a simple and clear way to manage vulnerable customers

Situation:
- Asked Davies to assess and recommend how to close gap on FCA vulnerable customer regulation requirements
- 2-year programme stalled under BAU pressures
- Complex approach adopted hampered business efficiency
- Needed a more pragmatic approach to manage vulnerability effectively

Key stats:

c.$1.1bn revenue

c.2.1m customers

1.7k employees

50% UK adults have characteristics of vulnerability

How Davies helped:
- Delivered a 12-point assessment to uncover service gaps
- Identified multiple areas to improve standards
- Designed pragmatic solutions to satisfy FCA vulnerable customer regulation
- Built governance and formed joint-delivery team represented by key functions
- Mobilised, delivered and led business to initiate full roll-out in 10 weeks

Results

Vulnerable customer lens applied to customer journey; new approach deployed from product to front line

No impact on operational performance

Employees able to deal with vulnerable customer with confidence