

PURPOSE

The purpose of this policy is to ensure that the operations of Family Funerals Trust and Lodge Brothers do not have any negative impact upon vulnerable customers.

For the purposes of this policy vulnerable customers are customers and prospective customers whose ability or circumstances require us to take extra precautions in the way that we sell and provide our services, in order to ensure they are not disadvantaged in any way.

WHO IS A VULNERABLE CUSTOMER?

Anyone can become vulnerable at any time.

The main factors indicating vulnerability include (but are not limited to):

- **Age** – young people are typically considered “inexperienced” while older generations may be facing the onset of ill-health, as well as the challenges of being less technologically able.
- **Health** – illness, whether physical, mental, severe or long-term, can make customers more vulnerable.
- **Drug/Alcohol abuse** – can temporarily or permanently change a person’s behaviour.
- **Personal circumstance** – factors such as financial difficulties, coping with bereavement, caring responsibilities. Low numeracy, literacy or English language skills can also increase vulnerability.

TRIGGERS THAT MAY HELP IDENTIFY A VULNERABLE CUSTOMER.

Here are just a few triggers that may help you to identify a vulnerable customer.

- **Remembering** – is the customer exhibiting any problems with their memory or recall. Are they asking the same questions repeatedly?
- **Understanding** – do you feel the customer is not fully understanding or able to grasp the information that is being given to them?
- **Communicating** – Is the customer able to share and communicate their thoughts, questions and decisions about what they want to do?
- **Evaluating** – can the customer “weigh-up” the different options open to them?
- **Agitated** – is the customer becoming agitated when speaking to you in the course of a normal conversation?

WHAT SHOULD WE DO IF WE ARE DEALING WITH A VULNERABLE CUSTOMER?

Just because someone is vulnerable does not automatically mean they are unsuitable for the products and services we supply.

It should act as a trigger for us to consider what reasonable steps might be taken in order for us to ensure that the customer is treated fairly and a positive outcome results for the customer.

When speaking to a vulnerable customer we should:

- Show understanding and empathy
- Provide additional opportunities for the customer to ask questions about the information we have provided.
- Continuously seek confirmation that they have understood the information that has been provided.
- Provide the information in a different format, e.g. if speaking on the telephone offer to put the information in writing to them – would a home visit be of benefit to them?
- Offer them the opportunity to complete the transaction after a period of further consideration.
- Ask if there is anybody who is able to assist them, and offer the opportunity to have a family member or friend present during the conversation.

If for any reason we think the customer does not understand the service or product that is being offered to them we should not proceed with the transaction.

The advice of the Directors should always be sought in these instances or if further assistance is needed in resolving a situation.