



1. INTRODUCTION

- 1.1. Customers are at the heart of what Co-Ownership does. For these purposes customers includes, people enquiring about our products, applicants and customers. This policy describes what Co-Ownership does to meet those needs. It applies to all Co-Ownership products.

2. PURPOSE OF POLICY

- 2.1. The purpose of this policy is to outline the approach that Co-Ownership takes/intends to take to meet the needs of all our customers including those who may need more help and support. This may be classed as vulnerable customers. It is part of Co-Ownership's overall approach in meeting the needs of all our customers.

3. SCOPE OF POLICY

- 3.1. This policy applies to all employees of Co-Ownership.

4. OBJECTIVES

- 4.1. The objective of the policy is to demonstrate our commitment to customer service for all our customers.

5. LEGAL FRAMEWORK

- 5.1. As part of its commitment to good customer service, Co-Ownership has developed this policy on meeting the need of all its customers. This especially applies to vulnerable customers.
- 5.2. Co-Ownership sees this as forming part of its approach to meeting the needs of customers. It is also aware that the financial services industry has certain requirements in relation to what it would refer to as vulnerable customers. Co-Ownership wishes to develop an approach for meeting the needs of all its customers.
- 5.3. The legal framework which will impact on this policy is:
 - Anti-discrimination legislation including disability discrimination legislation
 - The Powers of Attorney Act (NI) 1971 – which relates to the creation of powers of attorney
 - The Enduring Powers of Attorney (NI) Order 1987 – which relates to the creation and registration of enduring powers of attorney.
 - The Mental Health (NI) Order 1986 – appointment of a controller

6. IDENTIFYING A CUSTOMER WHO NEEDS MORE HELP AND SUPPORT

- 6.1. **Definition of Vulnerability:** A customer who needs more help and support has been described as “someone who, due to their personal circumstances, is especially susceptible to detriment”. It is proposed to use this definition in developing the Co-Ownership approach to meet the needs of such customers.
- 6.2. Vulnerability can be physical or mental, can be short term, longer term or permanent. It can include more than one element and can fluctuate over time. It can also be due to an emotional or financial shock.
- 6.3. **Encouraging Disclosure:** We aim to create an environment where customers feel comfortable sharing their needs and requirements. When engaging with customers, we will:
 - Clearly communicate that Co-Ownership is here to provide personalised support without judgment.
 - Use inclusive language in all interactions to encourage self-disclosure (e.g., "If there's anything we can do to make this process easier for you, please let us know").
 - Offer multiple communication channels (e.g., phone, email, or face-to-face meetings) to accommodate individual preferences.

6.4. **Proactively Identify Needs:** Our staff will be trained to recognise potential signs of vulnerability or circumstances where customers may need extra help. This includes:

- **Listening for Clues:** Observing verbal cues such as hesitation, confusion, or distress.
- **Asking Open-Ended Questions:** For example, “Can I explain anything in more detail for you?” or “Are there any specific challenges you’re facing?”
- **Using Customer Data:** Monitoring for patterns such as missed payments or frequent inquiries that could indicate difficulty.

7. HOW WE ENGAGE WITH OUR CUSTOMERS

7.1. We engage with our customers in a variety of ways such as:

- Through our digital portals
- By telephone
- By text message
- By letter
- Social channels
- Face to face
- Automated live chat

7.2. We will communicate with our customers in the way that most suits their needs.

8. THINGS THAT WE DO TO MEET THE NEEDS OF ALL OF OUR CUSTOMERS INCLUDING VULNERABLE CUSTOMERS:

8.1. UNDERSTAND VULNERABILITY IN CONTEXT

- **Identify vulnerable customers:** use data and customer insights to proactively identify those at risk of financial or personal vulnerability.
- **Train staff:** provide training on recognising signs of vulnerability (e.g., financial hardship, mental health challenges) and understanding regulatory requirements.

8.2. PROVIDE INFORMATION IN A VARIETY OF FORMATS

- **Website** – our website contains several accessibility features, including the ability to:
 - change colours, contrast levels and fonts using browser or device settings
 - zoom in up to 500% without the text spilling off the screen
 - navigate most of the website using a keyboard or speech recognition software
 - listen to most of the website using a screen reader (including the most recent versions of JAWS, NVDA and VoiceOver)

We’ve also made the website text as simple as possible to understand and have included an ability to translate the information on the website into different languages.

8.3. TAILOR COMMUNICATION

- **Accessible formats:** ensure communications are clear, jargon-free, and available in accessible formats.
- **Empathetic tone:** foster a culture of empathy and patience, tailoring interactions to each customer’s needs.
- **Support:** We offer the opportunity for someone to have a family member or friend to assist them. One of our local area officers will visit a customer in their home if they are

unable to come to our offices or feel more comfortable in their own home. We recognise the role of an attorney or controller who is looking after the affairs of a customer.

- **Clear:** We will offer to write to a customer to confirm what has been said to them over the telephone. Across all communication channels, we provide opportunities for customers to ask more questions about the information we have given and check their understanding of the information we have provided.

8.4. OFFER PROACTIVE SUPPORT

- **Early interventions:** use customer segmentation to identify potential vulnerable customer groups and provide regular check-ins to offer help before issues escalate.
- **Flexible solutions:** provide options like payment plans, all customer facing staff are accredited money guiders and can provide practical support and guidance, sign posting to additional support services.

8.5. EMBED BEST PRACTICES

- **Partnerships:** collaborate with charities, mental health services, or other organisations to provide holistic support.
- **Compliance:** ensure policies align with best practice, particularly around treating customers fairly.

8.6. USE TECHNOLOGY THOUGHTFULLY

- **Digital tools:** offer self-service options while maintaining human interaction for complex cases.
- **Assisted digital:** is available on all digital journeys where customers need support.
- **Data protection:** safeguard sensitive information to build trust.
- **Record:** where customers have provided consent, we will record the vulnerability and communication needs.

8.7. CONTINUOUS FEEDBACK AND IMPROVEMENT

- **Customer feedback:** regularly gather input from customers to refine our services and ensure accessibility.
- **Staff feedback:** involve frontline staff in identifying gaps, opportunities and service improvements.

8.8. EMBED A CARING CULTURE

- **Empower employees** to go beyond their roles to support customers, creating a culture where exceptional service is the norm.
- **Quality:** We monitor our calls to ensure consistency of service to all our customers.

8.9. CONSIDER VULNERABLE CUSTOMERS IN THE DEVELOPMENT OF NEW PRODUCTS AND SERVICES

- **New products and services** – when we are developing new products and services, we consider the vulnerabilities that customers may have and incorporate these in the design of such products and services.



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