

## **Vulnerable Customer Policy**

In order to adequately service all of our customers we make every effort to qualify our customers to fully understand their wants and needs, as well as identify any signs of customer vulnerability.

The FCA define a vulnerable customer is someone who, due to their personal circumstances, is especially susceptible to harm, particularly when a firm is not acting with appropriate levels of care.

We are aware that there are many risk factors that impact the level of vulnerability in our customers which include, but are not limited to, loss of loved ones/bereavement, illiteracy or language barriers, e.g. someone whose first language is not English, illness, disability, job loss and other impairments which increase the customer vulnerability.

Our customer facing staff aim to be alert to any potential signs that the customer is vulnerable and to have sympathy for their needs. This is gauged primarily through our qualification process. The qualification process allows us to ascertain what the customer is looking for, but also allow us to get to know them on a personal level and therefore have a better ability to determine any signs of vulnerability.

### **Here at Brooklands we aim to identify vulnerable consumers and support them by:**

- Sharing any information and potential vulnerabilities with our trusted strategic partners, i.e. finance companies/warranty companies. This is done with the customers express consent.
- Offering our customers an appropriate amount of time to consider our offer, giving them enough time to make an informed decision.
- Where a vulnerability is identified we may suggest/give the opportunity for the customer to seek the advice of a friend or family member.
- We ensure our small sales team have an up-to-date awareness of the importance of identifying customer vulnerability.
- Communicate as clearly as possible, with all information put to the customer in good time.

### **What signs do we look for to determine vulnerability?**

- Is it clear the customer fully understands the offering and service we're providing?
- Can the customer summarise our offer showing adequate understanding?

- Does the customer ask that we repeat ourselves regularly?
- Has the customer shared that they have a vulnerability?

**Process followed when dealing with a vulnerable customer:**

- Speak clearly with the customer, removing any jargon.
- Clearly signpost our sales journey so that the customer knows what to expect when dealing us. It is important to adequately signposting next steps.
- Be patient and allow the customer adequate time to consider their options as well as ask any questions or seek guidance from a friend or family member if needed.
- Check customer understanding of everything we cover, making no assumptions that a customer has understood the information provided.
- Suggest that the information we've discussed in person is summarised in a follow up email or telephone conversation.
- Log information regarding vulnerability so that we can continue to offer the level of service our customer expects and requires. This is done with the explicit consent of our customers and in accordance with data protection guidelines.
- Set out clear timescales for collection of their vehicle and next steps.

**What do we do when Vulnerable Customers are identified?**

- As a small sales team we will ensure that any relevant vulnerability information is available for colleagues that may be dealing with the customer going forward (such as in the case where another colleague may complete the collection handover or future meetings).
- Any potential vulnerability will be shared with our strategic partners as early in the process as possible i.e. finance companies at proposal stage (Close Brothers Motor Finance and Blue Motor Finance) and our warranty partners. This will be done with the customer's explicit consent. This process will continue where potential vulnerabilities are identified through the duration of the agreement.