



Tesco Mobile

Vulnerable Customer Policy

Version 3

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Scope

This policy document outlines how Tesco Mobile gives consideration to the needs of customers who are vulnerable due to disabilities, or who are vulnerable due to their circumstances (e.g., people in debt, victims of crime, or customers with physical or mental health problems). The policy also sets out (amongst other things), the measures Tesco Mobile has taken in areas such as:

- Establishing and publishing the systems, controls, and processes for treating vulnerable customers fairly.
- Identifying vulnerable customers.
- Recording information about the needs of vulnerable customers.
- Communicating with vulnerable customers.
- Staff training and utilising relevant resources appropriately.
- Monitoring the systems, controls, and processes in place to ensure they are serving their purpose.

To effectively highlight how important catering to the needs of vulnerable customers is to Tesco Mobile, this policy document will not only highlight best practice in treating vulnerable customers fairly, but also suggest ways to help the relatives or carers supporting them.

The aim of this policy document is to help all Tesco Mobile employees understand and respond appropriately to the needs of vulnerable customers, and ensure all employees are equipped to meet those needs. It aims to:

- ensure that vulnerable customers can obtain comparable access to our products and services, to that of non-vulnerable customers.
- detail our definition of vulnerability, and provide an in-depth description of the processes, policies, and controls that Tesco Mobile has implemented, to ensure the fair and appropriate treatment of customers whose circumstances may make them vulnerable.
- ensure that the appropriate measures have been implemented to safeguard the fair treatment of vulnerable customers, and to highlight the examples of good practice.
- build on our current practices to improve how vulnerable customers are treated, in consideration of our regulatory obligations.

This policy document applies to all Tesco Mobile employees (including contractors and temporary workers). All our business areas are required to make sure that they can

identify where vulnerable or disabled customers can be impacted and implement the necessary steps to mitigate any risks to those customers.

The measures stated in this policy document are reviewed on a frequent basis, to ensure that they remain useful and effective in catering to the needs of vulnerable customers. Tesco Mobile will use this policy to review our performance when it comes to ensuring that vulnerable customers are treated fairly, that their needs are met, and that the relevant steps are taken to continually improve our approach to this. We will also work with our regulators- the Financial Conduct Authority (FCA), the Office of Communications (Ofcom), and the Information Commissioner's Office (ICO)- to make any necessary changes to this document, and thereby, our processes and controls.

We comply with all applicable laws and regulations while also adhering to our own internal policies. However, it is worthwhile to note that the practices in treating vulnerable customers fairly are a dynamic and constantly evolving area, and as such, practices and factors that may influence them (such as technological advances), may change over time. As a business, we will continue to keep up with any future regulatory and industry developments and ensure that this policy remains aligned with any such developments.

Purpose

The Tesco Mobile customer journey can vary according to each customer's individual circumstances, and it is important to firstly be able to identify when a customer's circumstances have changed, provide the appropriate level of help, and to monitor this. A life event or a small change in circumstances can occur at any time, thereby emphasising how important it is that this is taken into consideration when handling any customer query.

It is also important to note that most vulnerabilities do not often exist in isolation; a customer may be experiencing more than one type of vulnerability at the same time (e.g., debt, unexpected life event, physical/mental health change).

Tesco Mobile maintains a complete and consistent approach to both the identification and account management of any vulnerable customer. This proactive approach is required to assist our most vulnerable customers, and to ensure a positive outcome is achieved in every case.

Tesco Mobile has established a vulnerability framework to ensure that vulnerable customers are being treated fairly, and that their needs are being met. This framework includes vulnerability training across all Sales & Service channels, the creation of new vulnerability processes, as well as the implementation of the Additional Support Team (AST). Although all frontline agents are trained to support the BAU queries (as some customers may specifically opt out of receiving specialist support), the AST are dedicated to supporting Tesco Mobile's most vulnerable customers and to support the most complex queries for vulnerable customers. We want vulnerable people to receive a high level of customer care to help them manage their services effectively, to help them get the right deal for their needs at a fair price, and to generally ensure that they are being treated fairly from the beginning of the customer journey to the end.

Aside from this policy document, we have implemented the necessary controls, processes, and procedures to ensure we achieve this. The foundation of these controls, processes and procedures have been regulatory obligations and industry guidance—specifically Ofcom's General Conditions of Entitlement (conditions C5.1-5.5; 3rd April 2023 update), requiring providers to have policies and procedures in place to make sure vulnerable customers are treated fairly.

Applicability

This policy document is to be viewed as a good practice guide, used to assist all Tesco Mobile employees in ensuring the right approach is always applied to improve the needs, and treatment of vulnerable customers. It is intended to be applied as a guide, to highlight how we achieve the fair treatment of our vulnerable customers, with more of an importance placed on the outcomes that are delivered for the vulnerable customers, as opposed to the precise means by which these outcomes are achieved.

As a business, if we do not understand the application of the right processes to assist any identified vulnerable customer, or the characteristics of vulnerability when it comes to our customer base, and therefore fail to ensure that our staff, products, and services meet these needs, our vulnerable customers may suffer poor or inconsistent outcomes, or an increased risk of harm. Hence, the positive and negative impacts of our products and services on vulnerable customers, are always considered; we try to consider the needs of our vulnerable customers at all stages of the product and service design process. Currently, any changes implemented are due to regulatory changes and updates, as opposed to customer verbatim. We are seeking to make changes within our processes that would involve direct feedback from customers to initiate any changes to our product and service design process. Some of the changes that have been considered include reaching out to charities like MIND, and the Samaritans; by seeking the output of external third parties directly involved in supporting the needs of vulnerable customers, we believe Tesco Mobile would be in the greatest position to ensure that all products and services are inclusively designed- Systems and processes are also set up in a way that will support and enable vulnerable customers to disclose their needs to the relevant staff, e.g., our AST, whilst ensuring that all staff are duly trained to spot signs of vulnerability.

One of our primary aims is to deliver appropriate customer service that responds flexibly to the needs of our vulnerable customers, whilst making sure these customers are aware of the support, they have available from Tesco Mobile. This includes providing relevant options for third party representation, and specialist support services in the form of our AST. Tesco Mobile has systems and processes in place that support the delivery of good customer service, including systems to note and retrieve information about a customer's needs. Additionally, we ensure that all communications and information about products and services are comprehensible for all the customers in our customer base and offer additional channels so that our vulnerable customers have a choice.

The key principle underpinning our need to take particular care in the treatment of vulnerable customers is the FCA's Consumer Duty Principle 12, which states that "a firm must act to deliver good outcomes for retail customers."

The advancement of digitalisation has decreased the need for face-to-face and telephone communications, with customers increasingly accessing services through Apps. Against this backdrop of increased digitalisation, it can be challenging for a

business like Tesco Mobile to identify vulnerable customers and respond effectively to their needs. The UK Equality Act 2010 imposes several duties on companies, designed to prevent customers in general, from being the subject of any kind of discrimination on the grounds of certain protected characteristics (e.g., anything that amounts to them being vulnerable). Additionally, as a multi-channel business, we have ensured that all members of staff receive the proper training, to eliminate any gaps that may arise in the provision of services and products, and lead to poor outcomes for vulnerable customers. The relevant staff training is also another major priority for Tesco Mobile because vulnerable customers are more likely to have different service needs; they may find some channels of communication more challenging or stressful and need more time to understand certain information and make the informed decisions. If as a business, we do not ensure that our customer service provision meets the needs of our vulnerable customers, we can exacerbate their risk of harm from being vulnerable; unresponsive or rigid customer service can increase the stress and confusion a customer already dealing with an unexpected or challenging life event, may suffer.

At Tesco Mobile, we have identified that vulnerable customers- especially those with disabilities- may feel increasingly marginalised when it comes to technological developments. Although digitalisation has created challenges for complying with regulatory obligations in relation to identifying and responding appropriately to the needs of vulnerable customers, we have implemented processes to ensure that the needs of our vulnerable customers are met, regardless of the channel they may use to contact us, or in the absence of face-to-face, or telephone support. These include ensuring that:

- our apps are compatible with screen readers for the visually impaired.
- individuals with restricted movement can provide fingerprint authentication.
- individuals with learning difficulties who struggle to read and interpret text, can understand the terms and conditions of a contract, and that they are able to use a Tesco Mobile handset appropriately.

Further digitalisation may continue to lead to vulnerable customers being disadvantaged or feeling as if they have unequal access to services. To ensure that this does not expose Tesco Mobile to any risks under the Equality Act 2010 (specifically section 20), or by our regulators, Tesco Mobile has ensured that a great deal of attention is paid to possible indicators of vulnerability, be it dealing with a colleague in-store, via phone, or via our app. Our duties under section 20 are anticipatory duties (i.e., considering in advance what is needed to make services accessible to all vulnerable customers) and as a business, we always consider the possible barriers any vulnerable customer may face, and/or what auxiliary aids and/or auxiliary services that vulnerable or disabled customers (with a range of impairments) may reasonably engage or require.

The issue of consent is another key topic for Tesco Mobile in ensuring that the needs of our vulnerable customers are firstly identified, and then met. The ICO has set a high standard for consent and so to make sure we are not in breach of this, we have

established clear processes which are unambiguous, and involve a clear and affirmative action, e.g., an opt-in option. The process we currently have involves:

- Thanking the customer for telling us about their situation.
- Offering to make a note on their account so they don't have to explain their situation again to a different member of staff.
- Letting them know that this can be removed at any time, that we will only keep the information for as long as it is necessary, and that the information provided will not be shared with anyone outside Tesco Mobile.

We do not have pre-ticked opt-in boxes; distinct (i.e., granular) consent options are required for distinct processes. Clear records are also kept to further demonstrate consent.

Defining Vulnerability- Legislation and Regulation

The term “Vulnerability” is extensive and can be extremely varied. However, there remains distinct similarities between the definitions provided by our regulators. Crucial to all our regulators is the requirement to actively understand a customer's personal circumstances, to provide them with the relevant services they require:

- Ofcom is the communications regulator in the UK, and defines vulnerability in terms of people's circumstances, which can change over time, causing them to become isolated if they are not able to keep in touch with family and friends. As a result, they become more and more withdrawn from society.
- The FCA is a conduct regulator for financial services firms and financial markets in the UK; the FCA has a broad view of customer vulnerability and frown upon applying a simplistic box ticking exercise to assess vulnerability. They believe that a person's personal circumstances can suddenly place them from a position of potential harm to an escalated one of actual harm if companies do not exercise a duty of care. Ensuring that customers have an appropriate degree of protection is central to the FCA's role- this includes the protection of vulnerable customers.
- The ICO is the UK's independent authority, established to promote access to official information and to protect personal information. The ICO believe that individuals can be vulnerable where, because of personal circumstances, their ability to freely consent, or object, to the processing of their personal data, or understanding its implications, can become impaired.

Additionally, under the Equality Act 2010, Tesco Mobile is aware that some groups of customers with certain protected characteristics may have, or be more likely to have characteristics of vulnerability, for example our elderly customers. All customers are at risk of becoming vulnerable, particularly if they display one or more characteristics of vulnerability.

This policy document combines Accessibility & Vulnerability but acknowledges that a customer can have a disability and not be vulnerable and can be considered vulnerable without having a disability. Due to this, and the differing characteristics of vulnerability, Tesco Mobile acknowledges that this may result in customers having additional or different needs that may limit their ability to make decisions and choices or to represent their own interests. Additionally, we acknowledge that all customers are at risk of becoming vulnerable and we measure such risk with our “Vulnerability Markers”, highlighting whether the customer's circumstance is:

- Situational
- Health
- Finance

To better serve vulnerable customers, and certify that their specific needs are being catered for effectively and efficiently, we have the following vulnerability markers in place:

- Age
- Bereavement
- Covid-19
- Crime Related / Civil Dispute
- Disability
- Life Changing Illness
- Life Event
- Mental Health
- PDCS Payment Support
- Priority Replacement
- Terminal Illness
- Audio Bill
- Braille Print Bill
- Large Print Bill
- No support
- Non voice contact
- Text Relay

Tesco Mobile also notes that not all customers with characteristics of vulnerability will be vulnerable, however they may require additional support, which if not met by us as a business, could have an impact on their ability to make decisions themselves, or to represent their own interests. The additional support we provide includes:

- Additional time (during conversations with out frontline staff, be it via phone or face-to-face)
- Providing bills (and other communication) in more accessible formats (upon request), such as audio, braille, and large print.
- Non voice contact
- Text Relay

A worthwhile point we have noted is that vulnerable customers may not want to be identified as being vulnerable and would not desire any additional support. This is also an option for customers, and we ensure that the term 'vulnerable customer', is not used during interactions with customers (although they have been referred to as such, for the purpose of this policy document). Tesco Mobile's inherent focus in relation to our vulnerable customers, is ensuring that we respond appropriately to the needs of our vulnerable customers, and on any harm or disadvantage they may face.

Accessibility

All of Tesco Mobile's different business areas are trained to support customers who have a vulnerability or an additional support requirement and if we've recorded that need, our advisors will know each time the customer makes contact. For example, a customer who has difficulty hearing and prefers all communication via email will not receive a phone call from us. Tesco Mobile is committed to ensuring that we make our business and services as accessible as possible.

Alongside requesting bills in more accessible formats such as braille, large print, and audio, customers with speaking or hearing difficulties can use the New Generation Text Service (NGTS) app. This allows them to type what they want to say, and an assistant will say the words for the customer. The assistant can also type the other person's replies for the customer to read. Further information is provided on Tesco Mobile's [NGTS Help & Support page](#) or on the [NGTS website](#). Additionally, AST have visibility of any vulnerability markers that may be on a customer's account in 'Care HUB' (within the boundaries of the requirements of Data Protection Act 2018), so the AST agent has full view ahead of accessing a customer's account.

Customers can ask to be contacted by email only, or ask us to show extra patience when speaking to them on the phone.

Customers can contact us in several ways, by phone, email, text service, letter, web chat or via social media.

To ensure the utmost ease of accessibility to Tesco Mobile's products and services, an additional factor we consider is the choice of words used when engaging with all our customers in general; to assure customers of our respect for them, inclusive language is used, to show our commitment to preventing discrimination, and promoting good relations and equal opportunity. The Money and Mental Health Policy Institute have identified that this is an important factor, especially for people with mental health problems, who may delay asking for help because they do not realise support is available, or are unaware of how to access such support. The charity also quoted research that highlighted that some people face challenges when using certain communication channels; therefore, offering varying communications channels, and allowing all customers to rotate between them when seeking assistance from Tesco Mobile is very important.

Difficulties in accessing all the different communications channels our business offers can lead to disengagement, exclusion, mistrust or even a heightened risk of falling victim to frauds; this is because the customers may instead rely on informal access methods. Vulnerable customers are more likely to become victims of fraud as they may be specifically targeted through unsolicited approaches and are more likely to be persuaded to disclose personal information. Research has shown that older customers are more likely to be at risk of fraud, especially in this digital age; as a result, our store colleagues

are always on hand to help such vulnerable customers access all the relevant information and services available. However, we are also aware that some vulnerable customers may need to rely on more informal access methods, and as such this can increase the risk of financial abuse. Tesco Mobile's AST are trained extensively, including to look out for any triggers or signs of coercion, which may thereby lend credence to the fact that a customer is being financially abused. We always consider a customer's capacity to make decisions when deciding how best to assist customers who have been victims of fraud; the Contingent Reimbursement (CRM) code is ingrained within our procedure relating to how we consider vulnerability in cases of fraud. The CRM code sets out standards that providers can implement, to reduce APP scams (where a customer is tricked into authorising a payment to an account they believe belongs to a legitimate payee); these standards include:

- protecting customers with procedures to detect, prevent and respond to APP scams.
- providing a greater level of protection for customers considered to be vulnerable to this kind of fraud.
- reimbursing customers who are not to blame for the success of a scam.

Tesco Mobile proactively informs all customers about the options of help and support we offer as a business, to meet the needs of vulnerable customers. By making such information known, we hope to encourage customers to share any information about their specific needs with us. Regardless of which channel a customer chooses to engage with us, our primary aim is to provide exceptional customer service, and ensure that their needs are met. We also make sure that customers can carry out important account activities such as sharing information about their customer service or accessibility needs, sales, re- contracting, switching, billing or complaints, regardless of what channel is used. Text relay services and bills in large print or Braille are also offered; Tesco Mobile records the preferred communication channels of our customers so that we take this into account whenever we need to get in touch with them.

We regularly review our communications, especially the most utilised by our customers, to ensure that they continue to remain fit for purpose, and to take account of any feedback or good practices shared by our regulators, relevant charities, and consumer bodies. Our communications are also occasionally tested with a range of customers with differing accessibility needs, cognitive problems and literacy levels. We know that some of our vulnerable customers find it useful to receive information and/or a recap of actions agreed in writing (e.g., via email, SMS, or post) following a telephone call or web chat, so that they can review and digest whatever was discussed in their own time; they might find it difficult to recollect information or have memory problems due to a particular health condition. Therefore, the offer of a follow-up information in writing is provided at the end of all conversations with our vulnerable customers.

Tesco Mobile Vulnerable Customer Journey

A Tesco Mobile customer journey can vary, and this variance can be dictated by a customer's own individual circumstances. A life event or a small circumstantial change can occur at any time, and it is essential that these are taken into consideration when we handle any customer query.

Tesco Mobile recognises these circumstantial changes and in response, we identify and categorise specific customers, as vulnerable, into the following classifications:

- Health Changes
- Life Events (Short & Long Term)
- Resilience
- Capability

Tesco Mobile maintains a complete and consistent approach to both the identification and account management of any vulnerable customer. Therefore, a proactive approach is required to assist our most vulnerable customers to ensure a positive outcome is achieved in each case.

Tesco Mobile believe that these same vulnerable customers require specialist care and attention during their entire customer journey. Therefore, we have established a vulnerability framework, across the business. This framework includes vulnerability training across all Tesco Mobile channels (Service, Telesales, Retail, Webchat Services), the creation of new vulnerability processes as well as the implementation of the AST, who (as previously mentioned) are dedicated to supporting Tesco Mobile's most vulnerable customers.

Tesco Mobile has developed a simple approach to identifying vulnerable customers. Detailed below are some of the processes we have implemented, to ensure that we are effectively catering to the needs of vulnerable customers throughout their customer journey with Tesco Mobile:

- Bespoke Vulnerability Training for all Tesco Mobile staff (Service, Telesales, Retail, Webchat Services) at induction, followed up with annual refreshers.
- Additional Vulnerability Training for specialist teams by Money Advice Trust & The Samaritans.
- Continued monitoring of vulnerable customer calls by Tesco Mobile's Compliance Team to ensure that these calls are being handled appropriately either by our Service Teams, AST or Tesco Mobile's Concerns Team who handle all complaints, including those from our Vulnerable Customers.
- Recruiting suitable personnel on the AST who are specifically skilled to support our vulnerable customers.
- System configurations to make the identification of vulnerable customers simple.

- Senior stakeholder involvement in all current and future strategies involving vulnerable customers.
- Net Promoter Score customer rescues, where AST will proactively contact vulnerable customers who have left a poor comment about the support, or lack of, received from a Service channel. AST will ensure they resolve the query for the customer with a full wrap around.

The current cost of living crisis has made us reassess the assistance we currently provide our vulnerable customers- especially those in debt and/or those who are experiencing financial difficulty. Although we currently work alongside The Money Advice Trust and The Debt Helpline to offer guidance to our financially vulnerable customers, recent engagement with our customers (through feedback and complaints received) indicates that quite a substantial amount of financially vulnerable customers are unaware of all the various ways Tesco Mobile can assist. As a result of this feedback, and to be aligned with the latest regulatory guidance update from Ofcom (in treating financially vulnerable customers fairly), we have implemented the following:

- Enhanced engagement with all customers to actively highlight the support Tesco Mobile can provide to our customers in dire need of financial help. Additionally, from feedback received, a lot of our customers were unaware that we work with third-party debt agencies. Therefore, increasing the signposting of the extent of help we can offer our customers, on our website and other channels, would increase awareness of this.
- Working with more external third-party debt advice agencies (aside from The Money Advice Trust and The Debt Helpline) and strengthening the alliance with these organisations, whilst posing ourselves the following questions:
 - What is the level of information we give to our customers re Money Advice Trust and The Debt Helpline?
 - Do customers know that we work with these organisations?
 - How are we communicating this? Do we provide this information in just payment and collections information?
 - What if there are customers struggling financially that Tesco Mobile does not yet know of?
 - What is the scope of help/assistance these debt advice agencies are helping Tesco Mobile customers?
 - Is there more that can be done?
- Ensuring that our customers are aware of the different ways in which they can make payments. We offer a wide breadth to any financially vulnerable customer

before it would get to the stage of a customer having their account disconnected. Tesco Mobile provides their customers with four different channels to make payments; in each of those channels, they can pay off either their full balance, or their oldest bill. By paying off their oldest bill, this prevents disconnection. Customers can also defer the payment of their bills, via their online account.

One of our most vocal regulators, Ofcom, has called on providers to offer and promote social tariffs, so that households on low incomes can have access to affordable broadband. Although several of our fellow telecommunications providers have implemented these social tariffs, Tesco Mobile has decided not to implement these just yet, as we do not believe that these would necessarily add any new help or assistance to our financially vulnerable customers. This is because we already have several measures in place to assist our customers struggling to pay their bills; these include our financially vulnerable customers not having to pay their airtime bill. By removing the need to pay their airtime bill, this works out as being cheaper for a financially vulnerable customer, than if we were to implement a social tariff.

The Tesco Mobile model aims to ensure that all customers, including vulnerable customers, are fairly treated, with all their needs catered to, from the beginning of their customer journey until the end. This includes the way in which we communicate with them; vulnerable customers may not be able to understand the information we send them (whether via post, email, or text), and may struggle to communicate their needs to us; low capability or physical disabilities may result in specific communication needs.

Physical conditions can also result in specific communication needs; for example, sight and hearing impediments can make certain channels of communication impossible to use, hence why as a business, we ensure that alternative and accessible formats are available to our vulnerable customers (in accordance with our regulatory obligations). Certain life events, e.g., divorce or bereavement, are temporary circumstances that can make it more difficult to comprehend information, and can make a vulnerable customer more susceptible, especially where the communications are unclear. Some mental health conditions such as anxiety can also lead to customers avoiding certain communication channels such as via post or on the phone. As a result, we ensure that communications throughout the life cycle of a product or service are clear, and provided to vulnerable customers in a way that they can understand and via alternative communication channels. This includes:

- Marketing
- Point of Sale
- Contract Summary
- Contract Modifications
- Complains process

Mental health conditions can also make it difficult for some vulnerable customers to contact our customer services by phone, and so they may not inform Tesco Mobile of an important issue, hence the importance of providing alternative channels of communication; someone who is illiterate or finds writing or typing difficult could suffer detriment if they are unable to communicate in person (i.e., visiting a store) or by phone. By proactively raising awareness of the different channels available, we ensure that our vulnerable customers can communicate through a channel that they can use effectively. We also ensure that all customers are aware of the process once they share information about a vulnerability with Tesco Mobile, as well as what additional support they will receive. We do this to help manage their expectations and minimise any concerns and anxiety they may have in sharing their personal information.

As a business, we understand that the needs of our vulnerable customers will vary, from one customer to the next, and each vulnerable customer will require additional measures and an extra level of customer service, to ensure good outcomes. At all times, we seek to understand the impact of vulnerability on the needs of our customers; for this reason, in every single area of the business, especially in relation to any new products and services, we always consider what types of harm or disadvantage our customers may be vulnerable to, and how this might affect their personal customer experience, and the outcomes they require. Additionally, we understand that a customer may not begin their customer journey with Tesco Mobile as a vulnerable customer, however, there are situations and circumstances that may lead to a once non-vulnerable customer, becoming a vulnerable customer at a later stage in their customer journey.

Whilst the handsets sold by Tesco Mobile, and the services we offer may not be harmful, in-depth analysis is conducted to assure that there are also no features of these products and services, which could be harmful to vulnerable customers:

- We ensure that any automated part of our general customer service telephone number and our store numbers, have clear exit routes for people with cognitive abilities, or more complex needs to use.
- ...All our PAYG and PAYM contracts are flexible and provide easy options for customers to vary or change them, in response to any changes in circumstances. For example, a customer who has had to take an extended period off work due to a medical/health ailment may struggle to pay their monthly bill. If we were unable to respond promptly and flexibly to their circumstances, this could exacerbate any financial or mental strain the customer may likely already be experiencing, resulting in further harm to them. Our AST can support customers with payment support options, i.e., deferrals and plans.

Tesco Mobile is aware that harm to vulnerable customers might occur unintentionally during the development stage, and as such, we proceed with additional care for any characteristics of vulnerability which may be present within our customer base. To ensure that the fair treatment of vulnerable customers is embedded as part of a healthy culture throughout Tesco Mobile- not just on the frontline- we provide the necessary

additional care and support to ensure that no customer finds our products and services too complex or difficult to understand. The needs of our vulnerable customers are also considered when thinking about a product or service change, e.g., if changes are being made to a communication channel in which our customers can contact us, or if a store is reducing the services offered or altering its opening times. A substantial amount of time is spent on understanding what our vulnerable customers may need from us as a business, and how they may be affected by any changes to our products and services. To ensure success with this, we always ensure that we have an appropriate business strategy, and appropriate policies and procedures to support this.

We think strategically about customer vulnerability in connection with all the products and services we offer and consider strategies for mitigating any risks that may arise. Additionally, we are aware that some of the policies and procedures we have in place to deal with vulnerable customers may need to provide for non-digital responses, as that may be what is required to respond appropriately to vulnerable customers. However, with regards to our vulnerable customers, we are aware that not all needs will be the same; we take additional care to ensure that needs of our vulnerable customers at the greatest risk of harm are met. These are the vulnerable customers that are more likely to require further support and adaptations. Tesco Mobile aims to act early to prevent any harm emerging or growing, by ensuring that our products and services are designed to recognise and respond to the needs of all vulnerable customers. We know that behavioural biases may present themselves and as a result, we understand where within the vulnerable customer journey there may be risks of inappropriately exploiting these biases when engaging with these vulnerable consumers. As a result, we constantly assess what types of harm or disadvantage customers may be vulnerable to, and how our actions as a business (whether through product design, service, etc) can increase or reduce the risk of harm.

Additional Support Team (AST)

Due to the diverse nature of vulnerability and potentially distressing scenarios from a customer, coupled with their rising volume, Tesco Mobile have created a dedicated support resource for our most vulnerable customers. This resource is called the Additional Support Team (AST), introduced in Q4 2019, and their objective is to provide vulnerable customers with specialist account management throughout their entire customer journey.

AST agents have appropriate training for working with and supporting our most vulnerable customers. They have been given tailored vulnerability training, under guidance from some of our partners at The Samaritans & Money Advice Trust. Agents have jurisdiction on signposting or transferring our vulnerable customers to another appropriate person, organisation, or an external agency, dedicated to a particular vulnerability, such as Step Change, The Samaritans, and Money Advice Trust for customers in financial difficulty.

Tesco Mobile's Service Channels (i.e., frontline staff) are the first point of contact for vulnerable customers; the frontline staff members look for vulnerability markers or triggers (key words, phrases, customer's tone of voice, customer's request, etc) to identify whether the customer is a vulnerable customer, and whether they would need additional and more specialised help. Once identified, the agent will give the customer as much support as they require. AST will step in and take over if a customer's vulnerability is more complex or the account needs a specialist touch. Once the customer has been identified as vulnerable and handled by AST, the customer will stay within AST until their query is resolved. This way Tesco Mobile can ensure that our most vulnerable customers receive continuity of care by the same team who know their personal circumstances. AST will also case manage Net Promoter Score customer rescues by proactively contacting vulnerable customers who have left a poor comment about the support, or lack of, received from a Service channel with a full wrap around.

To quickly identify these customers, and without having to ask for the same details on every call, Tesco Mobile can add a 'Vulnerability Marker' onto an account which will inform any agent viewing the account of the customers current vulnerability status. This Vulnerability marker is entirely optional for the customer as permission must be sought before any marker or note can be added to the account. Customers can request for their Vulnerability Marker to be removed at any time.

Tesco Mobile's AST workflow, timescales and processes are different from that of Customer Service and as such, work within a different framework. AST Agents will not be subject to a the usual PCA & call Volume SLA's but will be focused on Customer Experience, call quality and regulatory compliance. This allows for a more flexible, yet structured, approach to supporting vulnerable customers with any query.

AST's mission is to support our vulnerable customers when they need us the most. Tesco Mobile ensure our customers are truly cared for and listened to by providing compassion, trust, and a helping hand.

1. AST AIMS, OBJECTIVES & TOOLKITS

AST aims to build upon the solid foundations and infrastructure already established by Tesco Mobile regarding customer vulnerability. The induction and refresher training given to all AST agents, involves industry standard practices used for customers with vulnerabilities. AST's objectives are simple, to be a dedicated team who specialise in supporting vulnerable customers, no matter the query. To help support AST as much as possible, they have various toolkits at their disposal (revert to annexes further below). Below are the two most used toolkits that support AST when dealing with vulnerable customers.

- The TEXAS Model is used when an AST agent speaks to a vulnerable customer, as this provides a framework for structuring the conversation to ensure the relevant actions occur.
- As suicide discussions are getting more and more evident, suicide prevention training gives AST the necessary skills in analysing the conversation and ensuring that they do not miss any risk factors/indirect disclosures. If at any instance during the call, the customer discloses that they have been having suicidal thoughts or tendencies, the agent will focus solely on ensuring that the customer is not in any imminent danger. If this scenario occurs, AST have direct links into 101 for support.

2. AST VULNERABILITY STRATEGY

AST's Vulnerability strategy is to implement a support plan for vulnerable customers depending on their situation, assessed using various factors within call and written correspondence with the customer. The following classifications of vulnerable customers are used:

2.1 POTENTIALLY VULNERABLE

In this instance, a customer may be able to manage their own finances and make an informed decision. However, evidence obtained on a call or information divulged by the customer suggests that their personal circumstances will change. For example, an expectant mother or a customer finishing short term employment. Service channels would support potentially vulnerable customers with a view to referring them to AST should the requirement to do so occur.

2.2 VULNERABLE

These customers are, in their current circumstances, exposed to a level of harm, loss or disadvantage greater than that of other customers. Again here, Service channels would support vulnerable customers with a view to referring them to AST should the requirement to do so occur.

2.3 PARTICULARLY VULNERABLE

In this classification, these customers are currently severely at risk of being exposed to harm, in direct contrast to most customers in vulnerable situations. AST would support these vulnerable customers straight away.

3. CONTACT METHODOLOGY

Other than the standard inbound calling for Sales & Service channels, Tesco Mobile interacts with customers using a variety of options, from inbound & outbound calls, letters, emails, online webchats, and social media. We also support customers with communications in braille, large print, audio CD and will try and accommodate any other accessible format when requested by a customer. AST currently use the below contact methods to communicate with vulnerable customers.

3.1 INBOUND & OUTBOUND CALLS

AST will build positive relationships with customers to enable the customer to disclose their entire personal circumstances. With an engaging and empathetic manner, AST will be able to utilise their training, to the best effect, and by doing so will be able to devise a support plan, whilst fully understanding the customer's situation. AST have a structured conversation, collecting the relevant information required, to fully assist the customer's query through to full resolution. There are two important aspects to building customer rapport:

- a) Pace & Language. AST understand that vulnerable customers, may not have a particularly proficient understanding of the language used. Therefore, regarding the flow of the conversation, agents will need to exercise both patience and flexibility and use plain English, to ensure that the customer fully understands and agrees with the outcomes of their call.
- b) Active Listening. AST are trained to be active listeners, tuned into any changes within the customer's tone or sentiment that may develop throughout the conversation.

AST will work with the customer to contact them back at an appropriate time. The call content flow has been devised by Tesco Mobile management and agents, who already first-hand experience in dealing with customers.

3.2 WRITTEN CORRESPONDENCE

Bespoke letters, SMS and emails are also used to reply to vulnerable customers. They are all carefully worded content that has been designed with input from Tesco Mobile management and agents.

3.3 EMAILS

Emails are also tailored to each vulnerable customer according to their identified vulnerabilities, providing a solution that will work for them.

4. VULNERABILITY ASSESSMENT

AST are trained to a high level (Details found in [Section 3 Identifying Vulnerable Customers](#)) which gives them the ability to make an informed assessment on vulnerable and particularly vulnerable customers' current health and wellbeing, once contact has been established either by verbal or written correspondence. However, to be able to make a full assessment and devise the support plan, the agent will firstly have to complete the following on all verbal conversations with customers:

- Build a Rapport
- Identify Risk Factors
- Identify Any Indirect Disclosures
- Collect and Analyse Data

A combination of risk factors, indirect disclosures, and data collection in addition to the building of a rapport will be used to determine the appropriate support plan and outcome for a vulnerable customer. Each individual customer must be assessed using risk factors, indirect disclosures, and available data, whereupon it will then be decided as to what appropriate action is to be taken for their health, wellbeing, and financial situation.

4.1 IDENTIFYING RISK FACTORS

When AST devise a customer support plan, risk factors relating to a particular vulnerability must be recapped with the customer for full compliance. These risk factors can be divided into four categories:

- 1) Health
- 2) Life Events
- 3) Resilience
- 4) Capability
- 5)

These risk factors will allow AST to focus the necessary specialist support required to customer's health and wellbeing, as well as unravelled and resolve their account situation. The following table summarises examples of some of the risk factors, grouped

under these categories. However, it should be noted that the risk factors below are not binary or exhaustive:

Health	Life Events	Resilience	Capability
Physical Disability	Bereavement	Low or erratic income	Low level of literacy
Severe/terminal or long-term illness	Income shock	Low savings	Low level of financial capability
Hearing or visual impairments	Divorce	Low level of emotional resilience	Low English language skills
Mental health issues	Ex offender	Severe financial hardship	Being of a young age
Diminished mental capacity	Care leaver	Domestic abuse	Reliance on a carer
	Caring responsibilities	Homelessness	Elderly

All agents can add markers & notes within the systems with the customer's consent. This allows the recording of the customer's condition by obtaining the relevant information such as 'long term illness' and further breaking this down into actual conditions such as 'Cancer', 'Arthritis', etc. AST are likely to ask more specific questions, relating to the customer's condition, to fully understand the extent of the vulnerability. A key reminder is that this may change during the customer's journey with Tesco Mobile and that a vulnerable customer is likely to display not just one of these risk factors but a combination.

4.2 INDIRECT DISCLOSURES

With their additional training, AST Agents will be capable of identifying indirect disclosures, particularly difficult for regular agents within the Service channels. When the opportunity presents itself, these Indirect Disclosures can act as subtle triggers which will provide further conversation areas for AST to explore, thereby allowing them to fully understand the customer's situation. Examples of indirect disclosures are:

- Background noises within a call such as loud shouting, multiple children, or a crying baby
- The customer's tone/pace such as sounding confused or upset
- Not having a fixed address/telephone number or internet access

Having built an early rapport at the beginning of the call, AST will be able to tackle these topics from a much better perspective than a normal Sales & Service agent.

4.3 COLLECT AND ANALYSE DATA

AST have a wealth of information available which should be taken into consideration when assessing vulnerability. Furthermore, specialised vulnerability markers & notes within the systems, are incorporated to allow any agent across Tesco Mobile to view if a customer has a vulnerability or not, thereby helping them to gain a full understanding of the customer's circumstances straight away and without the need for the customer to repeat themselves. Examples available to an agent are:

- The mental capacity of the customer
- If the customer is in or has been in arrears
- A third party or Power of Attorney who is authorised to talk on the customers behalf
- Recently bereaved

However, any data held on the systems must be considered in conjunction with risk factors or any indirect disclosures ascertained. Furthermore, the data should always be verified with the customer for data integrity purposes. Agents must analyse the customer's pre-existing data on the system in addition to the data collected during the call to allow them to appropriately action the customer's account correctly.

4.4 CUSTOMER EVALUATION

Using all the tools available, AST will evaluate the customer's needs at that particular moment. Therefore, having built a rapport, having identified risk factors, indirect disclosures and captured the data, the agent will be presented with one of the following scenarios:

- **STABLE**
Within the Stable situation, although the customer is identified as stable, they can still fall within the vulnerable bracket. For example, the customer could have lost a close loved one but are receiving bereavement counselling to cope. However, agents must be mindful that the customer could have the potential to become unstable and have a crisis whilst under the care of Tesco Mobile. Therefore, in the event of a vulnerable customer moving from stable to unstable/crisis, their health and wellbeing must always be at the forefront.
- **UNSTABLE**
The customer is in an unstable situation which could potentially lead to a crisis; therefore, the customer's health and wellbeing are the priority at this moment. For example, the customer may be a recovering gambler and has had a relapse. AST could use this situation to signpost to a relevant external agency with the appropriate expertise in the customers area of need. Once the customer is in a stable state, the resolution of their situation can then be revisited by AST.

- **CRISIS**
The customer is in a crisis and requires immediate help from harm or suicide. If the customer is displaying suicidal tendencies, AST will notify Senior Management for support. However, not all crisis situations will involve suicide. For example, the customer could be a victim of domestic abuse and the threat against them is heard on the call with the agent. In any crisis, the main concern is to either save the customer's life or protect them from significant harm. Account queries are given secondary consideration.

5. SIGNPOSTING & WARM TRANSFERS

An important aspect of the Additional Support Team is to have the ability to signpost our most vulnerable customers. AST has built a network of localised contacts, with different areas of expertise, in order to provide the most vulnerable customers with additional help, if required.

- Citizens Advice Bureau
- Samaritans
- Mind (for better mental health)
- Dementia Friends (An Alzheimer's Society Initiative)
- Citizens Advice Trust
- Money Advice Trust
- ChildLine
- RNIB
- Step Change (Debt Charity)
- Telephone Preference Service
- NHS 111
-

This list is not exhaustive and with the growing reputation of AST, Tesco Mobile will continue to expand our support chains and contacts in the future.

6. AGENT SUPPORT

Anyone who works for Tesco Mobile may handle calls and correspondence that are exceptionally distressing, especially from particularly vulnerable customers. Agents are trained to provide as much help as possible to the customer and put in place the best possible care plan for them, utilising AST when applicable. AST handle these types of calls all the time and regardless of the additional training they receive, this has the potential to become a difficult situation for the agents to handle.

The senior management of AST are fully aware of the upsetting nature of some calls and the toll they can take on an Agent's own general health, as well as impacting on their own mental health. Therefore, after particularly upsetting calls, an agent can take time away from the phone allowing time for reflection and to talk to someone, such as the internal

agent support line. Online support from websites such as Headspace and SilverCloud provide additional support if requires. Furthermore, AST Senior Management operate an open-door policy and are available for any additional support required at any time, day, or night.

7. ANNEX

7.1 TEXAS MODEL

TEXAS is an acronym for the following:

- THANK THEM
- EXPLAIN
- EXPLICIT CONSENT
- ASK
- SIGNPOST

The TEXAS protocol should always be recapped during any future communication with customers.

THANK THEM

The agent will initially thank the customer for sharing the information with them to continue to build a rapport. Furthermore, this information helps the agent to deal with the account more accurately

EXPLAIN

It is a legal requirement under the Data Protection Act (DPA) that the agent must fully explain to the customer how an individual's personal data will be used and processed. This includes why the information is being collected; how it will be used to help decision making, and to whom the data will be shared with/ disclosed.

EXPLICIT CONSENT

For the agent to share a customer's information, they first must obtain permission from the customer to use any disclosed information regarding the account, such as the Vulnerability Marker.

ASK

The agent must ask the following three questions with respect to a vulnerable customer:

1. How does your vulnerability impact your ability to repay your debt?
2. How does your vulnerability affect your ability to deal or communicate with us?
3. Does anyone need to help you manage your finances, such as a carer or relative? If so, how?

SIGNPOST

The agent will then 'signpost' the customer to internal or external help as appropriate.

The external organisations that can support vulnerable customers are:

- Step Change
- Money Advice Trust
- The Samaritans
- Citizens Advice Bureau
- National Debt Line
- NHS 111

ADDITIONAL QUESTIONS

An agent may find it appropriate to ask further questions, depending on the individual circumstances. Examples of further questions that could be asked are:

- Does this affect your ability to deal or communicate with us? If so, how?
- Are you reliant on any third-party support to manage your finances?
- How has this impacted your income or ability to work?
- Are your circumstances likely to improve soon?
- Do you have any dependants who are reliant on you?

7.2 IDEA COMPASS MODEL

As opposed to a scripted conversation, the IDEA conversation model supports agents by providing a structured conversation. IDEA is an acronym for the following:

- IMPACT
- DURATION
- EXPERIENCES
- ASSISTANCE

The IDEA ideology provides a framework that allows agents to utilise their 'soft skills' and aid them through what are often termed 'delicate situations.' Each part of the model is a decision point that the agent must listen out for. This relates back to the active listening skills required of an agent. However, the agent can ask direct questions, if the decision point does not flow naturally into the conversation.

IMPACT

The agent, when conversing with the customer, will ask them if their vulnerable situation hinders them with respect to their financial situation or if it makes certain aspects more challenging. Furthermore, for any written correspondence received, the agent will assess what they can learn about a customer's vulnerable circumstances from the letter/email received. This could provide key information and insight into the severity of the condition and the consequences of the customer's financial situation.

DURATION

The agent will discuss with the customer how long they have had the reported vulnerability. The duration of different situations or conditions may vary and can also be obtained from any written correspondence. As a result, informed and consistent decisions regarding the steps required to improve the customer's financial situation can be taken.

EXPERIENCES

Agents will consider the variable nature of customer vulnerabilities; customers may have one episode that has a lasting effect or multiple experiences. A combination of support regarding the customer's vulnerability (such as help for those suffering from the side effects of medication.)

ASSISTANCE

Agents should consider if the customer has had access to care, help, support or treatment for their vulnerability or financial situation. This line of questioning may open up a discussion about obtaining medical evidence whilst on a call with a customer. Furthermore, in written correspondence, a response can be formulated that is supportive in terms of options available to the customer and further support options.

7.3 BLAKE MODEL

Understandably, the conversation between a call and a suicidal customer is an extremely delicate especially when a person's life could possibly be at risk. This could potentially be an overwhelming disclosure to the agent. Therefore, to fully manage these disclosures, agents can utilise the 'BLAKE' protocol. This methodology gives a framework for initially handling disclosures of suicide. The BLAKE acronym stands for the following:

- BREATHE
- LISTEN
- ASK
- KEEP SAFE
- END

BREATHE

After the initial disclosure, the agent should pause for a moment to focus their thoughts and acknowledge what the customer has said during the conversation.

LISTEN

If a customer has intimated that they are feeling suicidal then these statements should always be taken seriously. The agent will carefully listen to assess the urgency of action

required to safeguard the customer from harm. The agent will use verbal nods and recap key information given by the customer to highlight understanding of their situation.

ASK

In conjunction with active listening, the agent will ask the customer questions to fully discover their current circumstances and why they are feeling suicidal. Any uncertainties, regarding the customer's situation, should be clarified by asking questions where suitable.

KEEP SAFE

The agent will use their knowledge of the situation, gained from both their training and life experiences, to carry out the correct course of action, should the customer be at serious risk of harm. The agent will be fully prepared to stay on the call with the customer for as long as required, even when emergency services have been contacted. They will constantly reassure the customer, insisting that their safety, as opposed to their debt, is of paramount importance.

END

Once the customer's safety has been addressed, the agent will attempt to summarise what has been both discussed and agreed - for the call to be completed.

7.4 BRUCE MODEL

The BRUCE conversation model is used for an agent to identify customers with mental capacity limitations. The BRUCE acronym stands for the following:

- BEHAVIOUR & TALK
- REMEMBER
- UNDERSTANDING
- COMMUNICATION
- EVALUATE

BEHAVIOUR & TALK

The agent should be mindful of the following during calls:

REMEMBER

The agent should judge if the customer is able to remember previous actions on the account or the present conversation.

UNDERSTANDING

The agent should assess whether the customer understands what is being discussed and all that is being said.

COMMUNICATION

The agent should determine if the customer is able to communicate effectively, conveying their thoughts, questions, and decisions.

EVALUATE

The agent should assess whether the customer is able to evaluate what has been discussed on a call.

AST agents have appropriate training for working with and supporting our most vulnerable customers. They have been given tailored vulnerability training, under guidance from some of our partners at The Samaritans & Money Advice Trust. Agents have jurisdiction on signposting or transferring our vulnerable customers to another appropriate person, organisation, or an external agency, dedicated to a particular vulnerability, such as Step Change, The Samaritans and Money Advice Trust for customers in financial difficulty.

Whenever the AST believe that a vulnerable customer may benefit from additional support from a third-party organisation or even a charity, this information is provided clearly to signpost the customer to the organisation or charity, or take the necessary steps to put the customer through to the organisation or charity ourselves. Tesco Mobile has explored formal partnerships with specialist organisations such as Money Advice Trust, and the Samaritans, to give customers debt advice or support for mental health conditions. As a business, we understand that some vulnerable customers may be in difficult or situations which would be inappropriate for us to resolve, and because we do not have the appropriate services in place to fully resolve. Whenever we believe that there may be an immediate or serious risk to the life of a customer (or their family members), we consider it appropriate for the relevant authorities to be informed.

Tesco Mobile- Vulnerable Customers: Oversight and Outcomes

Tesco Mobile has identified that all three of our regulators have several preferred outcomes for vulnerable customers; we have made certain to ensure that this policy document is aligned to the delivery of those outcomes:

- **Communication:** There are multi-channel ways that our customers can communicate with us, be it by visiting one of our stores and speaking to a store colleague, by phone, by email, or messaging us via the Tesco Mobile App.
- **Tailored Approach:** All our customers- whether vulnerable or non-vulnerable- are treated as individuals. This enables us to ensure that we have tailored responses, according to the specific needs and circumstances of each customer.
- **Judgement:** All our customer facing staff have the authority and discretion to offer flexible solutions and outcomes where appropriate, and all our Head Office staff have customer satisfaction at the forefront of everything they do.
- **Fair Disclosure & Information Usage:** We encourage all our customers to be completely open, honest and have complete reassurance in the knowledge that any information they provide to Tesco Mobile will be used in their best interests.
- **Tell Once:** Information regarding customers circumstances is recorded properly to prevent them having to repeat themselves and go through any unnecessary or undue distress by having to repeat what could be sensitive information.
- **Carers:** All carers (irrespective of capacity) for Tesco Mobile's vulnerable customers, are treated with the utmost respect. We ensure that their concerns are noted accordingly, whilst adhering to GDPR regulations and ensuring that data security is maintained.
- **Third Parties:** There are a range of legal mechanisms to support customers who do not and cannot make their own decisions. There is consistent, considerate, and fair treatment of any relatives or carer of any recently bereaved, or those acting with a Power of Attorney or a Third-Party Mandate. Tesco Mobile would not regard a customer as lacking capacity to decide, unless all reasonable steps had been taken (without success), to help the customer make that decision, in accordance with the Mental Capacity Act 2005. We have also taken into consideration the needs of customers who need the support of a third-party, whether on a short or long-term basis. For short term third-party assistance, flexibility that doesn't undermine important safeguards are most appropriate. For example, to allow a third-party to pay a customer's bill to prevent them from going into debt, or to freeze a customer's account if there are concerns over fraudulent activity. The challenge with third-party mandates is ensuring that we continue to comply with all applicable data protection requirements.

We take into consideration what our vulnerable customers would reasonably expect when they share information about their needs with Tesco Mobile. Ensuring that we record and process the appropriate information regarding our customers generally, and vulnerable customers specifically, helps us to ensure that we are in line with our GDPR obligations.

By considering the characteristics and needs of our vulnerable customers, as well as what they reasonably expect when they share information or details of their circumstances with us, Tesco Mobile can anticipate and proactively address the difficulties that may abound over a customer's journey with us. Taking this into consideration allows us to prevent potential harms from occurring to our customer base generally, and to deliver better outcomes for our vulnerable customers specifically. However, even with inclusive products and services, some vulnerable customers will have complex needs or be in situations that our standard customer service staff may find difficult to address; for this reason, Tesco Mobile created our Additional Support Team (AST), to provide a more targeted support and specialist services to our vulnerable customers.

Staff Training

Tesco Mobile are committed to acting professionally, fairly and with integrity. Tesco Mobile mandate specific training modules for employees to ensure they are aware of Laws, Regulations, and local policies that impact upon their day-to-day work. There is mandatory training that is required to be undertaken relating specifically to accessibility and identifying and supporting vulnerable customers.

As a business, we embed the fair treatment of vulnerable customers across the workforce; we ensure that all employees understand how their role impacts the fair treatment of vulnerable customers and offer the necessary training thereafter. Further staff training is provided, to ensure that our frontline staff, especially our AST, have the necessary skills and capability to recognise and respond to a range of characteristics of vulnerability. Our frontline staff are also offered emotional and practical support in relation to dealing with vulnerable customers; this includes offering self-help information, taking a break (with unspecified minutes) following difficult or challenging phone calls, or sharing experiences with each other. However, the training frontline staff receive is basic training on how to support vulnerable customers and the process to follow. The AST receive more in-depth and specialised training in comparison. ACC (Voice Analytics) support these conversations that the frontline staff have with vulnerable customers.

We recognise the role that our staff play in meeting the needs of our vulnerable customers; these customers are more likely to suffer harm when staff do not have the necessary skills and capability to recognise and respond to their needs. All members of staff- from senior management through to frontline and relevant back-office staff- can influence the outcomes for vulnerable customers. Therefore, Tesco Mobile ensures that all relevant staff have the appropriate skills and capability, as well as support from appropriate systems and processes, to understand and consider the needs of vulnerable customers in their work. Our senior management have championed a firm culture that prioritises the fair treatment of vulnerable customers, and ensures that governance, processes, and systems are effective in supporting staff to meet the needs of vulnerable customers, when carrying out their role.

Such is the importance of ensuring that all Tesco Mobile employees are trained efficiently when dealing with vulnerable customers that as part of our staff training, we implement appropriate processes to evaluate where they have not met the needs of vulnerable

customers, so that the necessary improvements can be made. These processes include producing and regularly reviewing management information (MI) (appropriate to the nature of our business) on the outcomes which are being delivered for vulnerable customers; the MI data is a useful tool in helping us to integrate an understanding of the needs of vulnerable customers within our business- an understanding that goes beyond the specific interactions.

Tesco Mobile aims to improve the skills and capability of our staff when it comes to vulnerable customers, in a way that is proportionate to the size of our business. All new employees (including temporary staff and contractors) are required to complete mandatory online CBT training with a section dedicated to vulnerable customers, and an assessment that requires the staff member to pass with no less than 80%, as completion of the training. We also actively share relevant information from the guidance documents of our regulators, as well as existing materials on vulnerable customers from professional bodies, trade associations, charities, and consumer organisation websites. Existing employees are required to undertake an annual refresher of the training to ensure they are continuously up to date with their understanding of vulnerability as a subject, effective and efficient catering to the needs of our vulnerable customers as a purpose, and the necessary skills required to achieve this purpose within their individual roles.

Within the different tribes, staff are given the opportunities to share their knowledge and experiences with other colleagues, to help improve the level of support, and increase understanding of how to consider vulnerable customers when performing their duties. Our AST are Tesco Mobile's dedicated vulnerability team who are on hand to not only assist our vulnerable customers, but to discuss complex cases and offer support to frontline staff. Alongside this Vulnerable Customers policy document, our AST have developed 'How To' guides based on their knowledge, so that frontline staff can utilise these guides in their day-to-day role. However, as part of our CBT training, we train all staff to be able to recognise when it is appropriate to seek additional support, such as escalating a case to the next level, seeking additional help from the AST, or referring a customer to the appropriate third-party support (if the customer is in a difficult situation which is out of scope of the firm's remit. Harm can arise if frontline staff are not aware of existing policies; although we have policies and procedures in place relating to vulnerable customers, there would be a clear risk to these types of customers if frontline staff do not have the right knowledge or skills to implement these effectively- the FCA refers to this as the 'policy/practice' gap. We also have a 'Vulnerable Customers champion', who is a lead representative for the business when it comes to the interests of vulnerable customers and makes the senior management team aware of how any proposed changes the business may make, will affect the vulnerable customers.

Apart from the annual staff training all staff must undertake, at Tesco Mobile, we also ensure that all staff have appropriate resources and reference materials at their disposal, especially our frontline staff, so that they can communicate with our vulnerable customers with knowledge and confidence. Some of the resources include our 'Care HUB'- this is Tesco Mobile's centralised hub where everything relating to Tesco Mobile, our processes and customer data are housed. It is also filled with information and resources relating to vulnerable customers, as well as links to additional or external services.

Monitoring

At Tesco Mobile, we believe that it is futile to have implemented systems, controls, and procedures to help our vulnerable customers, without having a process of how we monitor the effectiveness of those systems, controls, and procedures; because of this, we have several ways in which we monitor whether we are achieving the outcomes stated in this policy document for our vulnerable customers. This includes periodically reviewing all our products and services to ensure that they still meet the needs of our vulnerable customers, and they are not unintentionally disadvantaging them in any way. Additionally, whenever a new product or service is introduced or withdrawn, one of the first things we seek to understand is how such a move will impact all our customers generally, and in particular our vulnerable customers.

By conducting our monitoring in this manner, it allows us to determine whether as a business, we are indeed achieving good outcomes for our vulnerable customers, as well as helping us understand which elements of our products and services work well for them, and which ones need to be adapted to improve the outcomes for our vulnerable customers. Not carrying out effective monitoring and analysis on our products and services may result in us not adhering to the guidance set by our regulators (in relation to treating vulnerable customers fairly) and failing to identify which areas of our products and services are not meeting the needs of our vulnerable customers, and thereby what needs to be changed as a result.

Tesco Mobile has implemented processes within the vulnerable customer journey, to help us effectively identify the following areas:

- Where we, as a business, do not fully understand the needs of our vulnerable customers (e.g., whether our customers are able to access services, products, and their features, that are suitable and meet their needs- even when those needs change).
- Where inadequate customer service from our staff has led to poor outcomes for our vulnerable customers (e.g., whether our customer service and communications meets the needs of our vulnerable customers).
- Where our products and services cause harm to our vulnerable customers unintentionally (e.g., whether our products/services are meeting the needs of our customers when providing them with information and support to make decisions, and whether they are supported and encouraged to share information about their circumstances and their needs).

These processes include recording the calls that our AST take and monitoring these calls to ensure the relevant information is and high-quality customer service is being delivered by our frontline staff, acknowledging any members of staff (following positive customer feedback received) who have gone above and beyond their role to offer exceptional

service to a vulnerable customer, and delivering comprehensive feedback and the necessary coaching to staff to highlight any improvements needed. We also actively use the feedback received from our vulnerable customers, to determine which areas improvements need to be made; such feedback is comprised of data from our customer satisfaction surveys, complaints received, comments and insights received from social media, and any online forums. We also conduct random customer service calls to conduct quality assurance evaluations, to make sure the right information and services are provided to vulnerable customers, and work with consumer bodies such as

Tesco Mobile regularly monitors any trends in the level of complaints we receive (e.g. whether there has been an increase or decrease), and carry out the necessary root-cause analysis, to identify where potential shortcomings or concerns are. Furthermore, we contact and speak directly to any vulnerable customers who have complained, so that we can gain an in-depth understanding of where we went wrong as a company, and how their experience could have been better handled by us; we do this so that we are not solely reliant on high-level feedback, and thereby providing balanced and varied customer experience feedback.

Our Leadership Squad also take an active role in monitoring our performance in ensuring that we are meeting the needs of our vulnerable customers and are treating them fairly. This is not only so that they have a clear oversight of how Tesco Mobile as an organisation is treating its vulnerable customers, but also so that improvements can be made to any areas where there are clear gaps, and an assessment can be made of the quality of customer service being delivered to our vulnerable customers. Tesco Mobile's annual reporting process also contains performance measures relating to the service we have provided to our vulnerable customers.

As our frontline staff (including AST) are the employees that have the most interaction with a customer identified with a vulnerability, they are regularly asked for their recommendations based on customer feedback through focus groups, staff surveys and other internal forums. It is not only our frontline staff who have access to these channels- all Tesco Mobile staff can have focus groups, staff surveys and other internal forums, and these channels are used not just to monitor the service we deliver to our vulnerable customers, but also to discuss any issues or concerns, and share good practices and good customer service stories. In this way, we ensure that the fair treatment of our vulnerable customers is embedded within Tesco Mobile's culture.

Management Information

As part of the FCA's Consumer Duty Principle 12, firms are encouraged to have measures in place to test whether they are treating their customers fairly and delivering their consumer outcomes, and that they are monitoring customer feedback and data.

A significant way in which Tesco Mobile monitors the controls and processes we have implemented to ensure we are treating our vulnerable customers fairly, is through management information (MI). We track the volume of vulnerable customers monthly (although this data can be collected at any time). This gives us oversight of how many customers fall under each category of vulnerability (i.e., our vulnerability markers). We accumulate MI monthly, so that as a business, we are constantly able to identify any trends, any improvements needed to be made to our current processes and controls, risks or other issues that would mean that we are not adhering to regulatory obligations and guidance. As previously mentioned in this document, as a business, we know that customers' needs, circumstances, and the channels of communication can all change, and collecting and analysing MI on such a regular basis allows us to ensure that we are always delivering the right outcomes for our vulnerable customers, and for any areas where we are falling short, we can rectify this immediately.

Our MI allows us to review whether there are any inherent differences in the outcomes for our vulnerable customers, in comparison to our non-vulnerable customers. The sources of our MI is obtained across the different areas of our business and we also ensure that we collect it at different points of the customer journey (for example, from the first interaction with a frontline member of staff to when their product/service has been received), so that as a business, we gain a holistic view of what improvements to make to our vulnerable customers controls and processes, if any, and also the experiences and outcomes of our vulnerable customers on their customer journey. Where we identify poor outcomes for our vulnerable customers, an in-depth analysis is undertaken to find out what is driving these outcomes, and changes to be made accordingly, to see improvement.

The information collated as part of our MI includes (but not limited to), rate of customers who have switched and reason(s) provided for this, level of calls our AST have received, level of complaints alongside a root cause analysis, and reviewing compliance reports to check if standards are being met in terms of treating all customers fairly.

Recording Information

One of the most important elements of our process in relation to catering to the needs of our vulnerable customers is ensuring that our systems and processes allow all customer service staff to record and access information that will be required in the future to respond to the needs of vulnerable customers. Vulnerable customers can be exposed to further harm if we have incorrect information or are not aware of information that has already been shared with another part of the business. For example, if a customer facing financial difficulty informs one part of the business that they are experiencing financial difficulty due to job loss, illness, etc but the system does not allow this to be shared with the appropriate department and Tesco Mobile fails to alter this to reflect the customer's new circumstances, we could be making their situation worse. The challenge with this is that because vulnerability is often temporary and can happen at different stages of the customer journey, it may not occur to a customer to share their needs at the beginning of their customer journey with Tesco Mobile, and they may not have any needs to share at the point. Hence why we place such an emphasis on ensuring our systems and processes to record and access information are always accurate and efficient. We also have points in the customer's journey (i.e., contract renewal) to gather further or updated information on customers' needs.

Tesco Mobile believes that the foundation to ensuring that the correct information is recorded lies with ensuring that our frontline staff are adequately trained to actively listen out for information that would be able to indicate vulnerability and, where relevant, seek further information from the vulnerable customers, which would allow the frontline staff to effectively cater to their needs. For example, if a customer mentions something that would indicate vulnerability, the staff are trained on how to effectively follow it up. However, seeking further information and being able to execute this would largely depend on the type of interaction (e.g., store, phone, etc), the customer, and the type of service being provided.

Some vulnerable consumers need additional support in making decisions or rely on others to make some decisions on their behalf. This may be because their ability to manage their money or represent their own interests is permanently or temporarily impaired (for example, due to dementia or mental health conditions). Hence why we provide straightforward options to enable legitimate and legal delegated access or support, while maintaining robust safeguards to reduce the risk of any kind of abuse.

Reporting Breaches

You have a duty to speak up if you believe the policy has been breached.

Speak to your line manager in the first instance. If this is not possible, speak to the Legal and Compliance and Regulatory Affairs team, a member of your business area leadership team or email tescomobilecompliance@tesco.com to report your concerns.

Failure to comply with this policy may result in disciplinary action being taken against any colleagues concerned or the termination of contracts with third parties working for Tesco Mobile.

Consequences of Non-Compliance

A failure to have due regard to the vulnerability of customers can result in significant regulatory consequences for Tesco Mobile.