

Vulnerable Customers Charter



Corporate Business is committed to providing an excellent customer service experience for our customers. As part of this, where we identify that a personal customer is a vulnerable customer, we will ensure that they are provided with such reasonable arrangements and/or assistance that may be necessary to facilitate him or her in their dealings with us.

Our customer range is companies, trustees, affinity groups, Personal Retirement Savings Accounts (PRSA) company plan holders, annuity holders (pensioners), income protection claimants and holders of Personal Retirement Bonds (PRBs).

Awareness of customer vulnerability - how would we identify a vulnerable customer

Staff are trained in customer service skills and compliance requirements in dealing with customers. Part of this training is recognising vulnerabilities of the customer. Identification of a customer's vulnerability or otherwise:

- A. Will require the exercise of judgement and common sense.
- B. Should be based on a customer's ability to make a particular decision at a point in time.

Below are the different categories of vulnerable customers together with examples.

	Categories of Vulnerable Customers	Examples of Vulnerabilities
1	Capable of making decisions but their particular life stage or circumstances should be taken into account when assessing suitability.	Age, poor credit history, low income, serious illness, bereaved, life changing events, etc.
2	Capable of making decisions but require reasonable accommodation in doing so.	Hearing-impaired, vision-impaired, English not first language, poor literacy.
3	Limited capacity to make decisions (temporary/permanent).	Mental illness/intellectual disability.

How should we treat a vulnerable customer at point of sale

The Central Bank states that the identification of a vulnerability should be an inherent part of the Knowing the Customer process, during which regulated entities should consider whether there is any evidence of customer vulnerability, as outlined in categories 1,2 and 3 in the previous table.

Category 1

Customers that fall into Category 1 should have their circumstances taken into account by regulated entities as part of the Knowing the Customer and Suitability requirements. Specific questions are asked of the customer in relation to recent life changing events in their lives and consideration given to this.

Category 2 and 3

In addition to existing protections, including the Knowing the Customer and Suitability requirements, under provision 3.1 of the Consumer Protection Code, regulated entities must provide those identified as 'vulnerable customers' **with such reasonable arrangements or assistance that may be necessary to facilitate their dealings with that regulated entity.**

Examples of such arrangements are offering to provide information in larger print, allowing an additional person attend the meeting, having several meetings with the customer. Assistance in accessing the website could also be useful.

If there is a particular doubt regarding a poor level of cognitive reaction/capacity to understand the process, the meeting should be scheduled again for a later date, and the next steps considered before re-engaging with the customer. Concerns about the customer's understanding should be documented.

What other considerations are in place to deal with vulnerable customers on an ongoing basis

Record keeping/evidence of further requirements

Should a particular vulnerability be identified at point of sale, this should be updated to the customer's record to ensure this is considered in communication.

Customers

Customer Service Training and Awareness. A review of the notes column in relation to the customer to identify if vulnerability was identified previously.

Pensioners

There is a strong awareness in the Pension Payments team dealing with pensioners regarding their requirement for clear information and understanding. Visits into reception to seek information are welcome. Information is communicated in plain English and with bigger print where we have been informed of a difficulty in reading standard print.

Approach and assistance for elderly in line with conventional norms when appropriate; e.g. speaking slowly and more clearly, patience in interpreting instructions, taking instructions to speak to their relatives.

Continuing trends to push customers to online interactions can prove difficult for pensioners particularly when dealing with tax matters. In such cases consideration should be given to our contacting Revenue in cases where it appears from our records that the pensioner's tax details are incorrect.

Our role here will merely be to inform Revenue that the pensioner's tax details appear to be wrong and requesting that they be checked and amended if necessary.

Income Protection claimants

The Health Claims visitors are particularly experienced in dealing with vulnerable customers. The Claims Assessors have particular experience and training in this regard.

Income Protection claimants - home visits

Additional support and home visits may be available as an option to customers to communicate with us in an environment they feel comfortable in. This avoids transport and building access challenges that exist or are perceived by the customer.

If staff want to offer the additional assistance or discuss concerns regarding a customer, they can discuss with one of our trained Health Claims Advisors. This could identify new trends in approaches and assistance that can be provided in specific circumstances to people with vulnerabilities.

Other claimants

A sensitivity to these customers regarding payments and general customer service is evident in our interactions.

Website and Literature

- > All literature is reviewed for understanding.
- > Website accessibility is clear (see Appendix 1 for current functionality).

Doubt over capacity to make a decision instructing us

- > Delay the customer and arrange another phone call/ appointment.
- > Suggest they visit our office.
- > Politely recommend could they bring someone else to the meeting.
- > Arrange another appointment and bring another staff member.
- > Document your concerns.
- > Refer the case to your manager, who in turn will consider the situation and involve appropriate parties should the need arise.

Power of attorney

Where we must deal with a person who is acting for a customer under a power of attorney we must:

- Obtain a certified copy of the power of attorney.
- Ensure that the power of attorney allows a person to act on the customer's behalf.
- Operate within the limitations set out in the power of attorney.

Culture and awareness

- > The Corporate Business website contains our charter on dealing with vulnerable customers. Our website has accessibility features.
- > Yearly training reiterates the messages regarding awareness of vulnerability and our commitment to this.
- > Development of external systems and communications should take into account accessibility.

Complaints received

We analyse complaints received to identify any trends pointing to specific gaps in how we deal with vulnerable customers. If such gaps are identified our processes/ practices are adapted to mitigate them.

One stop notice

A customer should not need to tell us about their particular needs or circumstances more than once. Where we have been advised of a difficulty our policy records should be noted to this effect.

Review call handling experience

Learnings from call activity throughout the month is discussed at team meetings to ensure difficulties are eliminated as much as possible.

Elder abuse

The identification of suspected elder abuse will require the exercise of judgement and common sense and should be based on the customer's ability to explain the circumstances of the abuse.

If we form the opinion during the course of a conversation that the customer may be the subject of elder abuse, we will encourage them to report the matter to the **HSE Information Line** at 1850 24 1850.

Appendix 1

See the websites current accessibility features on the accessibility tab on the main page. **Accessibility/Irish Life Corporate Business.**

Information correct as at November 2021.

Please Note: Every effort has been made to ensure that the information in this publication is accurate at the time of going to print. Irish Life Assurance plc accepts no responsibility for any liability incurred or loss suffered as a consequence of relying on any matter published in or omitted from this publication. Readers are recommended to take qualified advice before acting on any of the matters covered.

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