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County Broadband Vulnerable Customers Policy

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Document Control

Originator of this document:	Katie Crellin Regulatory Policy and Reporting Manager County Broadband
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Version History

Issue	Date	Notes	By Who
1	06.12.23	Initial Document	Katie Crellin
2			
3			

County Broadband Vulnerable Customers Policy and Guidance

The purpose of this document is to outline County Broadband's approach to vulnerable customers and set out its internal guidance on measures and actions to be taken to support those vulnerable customers.

Our mission statement on supporting our vulnerable customers.

At County Broadband, we pride ourselves on loyalty to our community and strive, through continued exceptional customer care, to support all our customers, including those who may be vulnerable and need additional support.

Definition

Additional support is classified to varying degrees throughout publication from industry providers and regulators. To County Broadband, a vulnerable customer is someone, more susceptible to harm due to one of (or several) factors in their personal circumstances. Including;

- Age
- Changes in circumstance (for example bereavement, job loss, change in household income etc.)
- Communication difficulties
- Geographical (no phone signal or landline service)
- Learning disability
- Low literacy
- Physical disability
- Physical or mental health problems
- Technological

These vulnerabilities can be temporary or permanent fixtures in a customer's life. They may not be obvious to us, and the scope may vary.

We have a moral responsibility to support and protect our vulnerable customers interests and do so by;

- Making ourselves available for customers to inform us they're vulnerable.
- Looking out for vulnerabilities and working to understand the needs and;
- Preparing to take actions or adjustments enabling us to provide the necessary additional safeguards, services or resource to support the customer.

Identifying and Recording of Vulnerability

Customer Self Report

Via risk register form

A customer is able to inform us that they belong to one of our vulnerability categories. In the case that a customer does inform us of their vulnerability, we will ensure that the identifying marker of vulnerability is added to the customer account.

Our website and customer portal allows customers to download a basic form to enrol onto our vulnerability register, without needing to feel uncomfortable. If customers require the risk register registration form in an accessible format or are unable to download it from the website or portal, they can contact our care team to request one.

Any data gathered in this way will be added appropriately to the system and will then be either securely stored for GDPR purposes, or deleted, depending upon specific business needs.

Customers can also send us a completed Vulnerability risk register registration form to our registered address; County Broadband Ltd, Old Bouchiers Hall, New Road, Aldham, CO6 3QU.

Via contact with our Teams

A customer is also able to tell us via our Care communication channels, or in person that they would like to enrol onto the Vulnerable Customer risk register.

Our agents will endeavour to assist the customer with their application where required.

Customers can also notify our "on the ground" sales team that they wish to enrol on the vulnerable customer risk register and our sales team will assist by getting in contact with our care team.

Contacting our Customer Care Team

Vulnerable customers may sometimes need to contact our Customer Care team quickly and directly. To facilitate this, customers who tell us they're vulnerable will be provided with a contact telephone number that grants direct access to the care team.

County Broadband Handling of Vulnerability

Age

County Broadband understands that customers may feel more vulnerable in certain circumstances as they get older.

Where we identify that a customer may need extra assistance in this area, we will ask if the customer would require any extra support (without necessarily needing to be added to our at risk customer register).

Change In Circumstance

At County Broadband we understand that customers may experience a change in circumstance that couldn't be avoided, for example (but not limited to):

- Bereavement; or
- Marriage breakdown / Living arrangement change; or
- Job loss

We can discuss and adjust accounts for customers who encounter a major change in circumstance. We may request for proof of the change in circumstance before any adjustment can be made.

We understand that bereavement is difficult and our bereavement policy allows family members or contacts of the customers to cancel a customer's account in the event of the customer's death, by providing evidence of a copy or picture of the death certificate.

Bereavement can also impact our customers in that a member of their household, potentially a partner passes away. This may result in the customer being unable to afford their broadband payments. In these cases, the Customer service team will be able to work with discretion to reach an amiable solution for the customer, which may include reducing tariff and cost, or cancelling the contract.

Communication difficulties

Some customers may find it difficult to read the communications that we send as a business, or even may struggle to understand the language in which we conduct our business. These customers may need to request certain alterations to communications with them to ensure we adapt and support them.

We may be able to offer a variety of mediums for customers to receive the same communication, if the original medium is not sufficient. Including:

- **Audio file;** or
- **Letter** (Large font)

A customer may request large font communications for any print communications that we send.

Contact with Customer Care teams.

Where possible we aim to make adjustments with our customers to ensure that if they identify as belonging to one of Our defined vulnerability categories, they are able to contact us by phone directly.

Different Languages (upon request)

When speaking with customers whose first language isn't English and they struggle to understand Our communications, Our Care Team will try to work with the Customer to identify a named contact (who can speak English) with the customer that the agent can communicate with.

195 Directory Service

This service is set up to allow blind and disabled customers to contact directory enquiries services to provide phone numbers, when using a phonebook isn't a possibility. It's available across services with all providers.

The service is external to County Broadband and requires sign up using [this link](#) and needs a medical professional to countersign the application.

Text phone

If a customer wishes to call a number where the call recipient is deaf or hard of hearing, they need to dial 0870 240 5152. Calls via this number cost 1p per minute.

If customers themselves are hard of hearing, they will need to dial 0870 240 9598. Again, calls via this number cost 1p per minute.

The call connects users to Relay UK and the customer will need to provide the phone number of the person they wish to call and the agent will help connect them.

999 BSL

The 999 British sign language [website](#) allows users to connect to the webpage and contact a sign language interpreter for the emergency services.

This service is accessed in any web browser by the customer and is also available in an app format.

If a customer informs us that they are deaf / hard of hearing, we will provide them with a free of charge battery backup unit (BBU) for their router to ensure that calls to the emergency services via 999 BSL are still possible in a power outage (subject to BBU power duration and customer device power).

Geographical

County Broadband prides itself on being able to bring Hyperfast Full Fibre to areas that other providers have not been able to reach. As a result of this, we recognise that a number of our customers may become geographically vulnerable.

By that, we mean that customers may not have access to a mobile phone signal and rely on our broadband and Voice service for contact with the wider world. On the rare occasion that a customer loses their County Broadband connection due to a power outage at their property, they may need the ability to contact the emergency services.

If you believe that you are one of our customers impacted by this, please contact us so that we can explore options of providing you a one-hour battery backup unit for your router. If you do not fall under this umbrella, but would like to purchase a unit of the same specification, you may be able to do so by contacting our care team.

Learning Disability

Learning disabilities may mean that a customer is unable to understand the documentation or processes required to either sign up to a County Broadband service, and or action any decisions on the account.

A customer that informs us of their learning difficulties should be able to nominate a person to complete any activities on their account in a similar manner to that of a power of attorney.

If this vulnerability applies to you, please contact our Customer Care team who can assist you in enrolling for our vulnerability risk register.

Physical Disability

Customers who inform us that they have a physical disability should be asked what adjustments need to be made to ensure that our customer support function can adapted appropriately for them.

If the customer has specific medical equipment that requires internet accessibility to function correctly, we must ensure that we offer the customer a battery box unit free of charge to ensure continuity of power to the customer router.

Mental Illness

As with physical disabilities, we understand that on occasion, we may need to alter our customer support function for our customers who tell us that they have a mental illness.

If you require further assistance or support from us, please inform our customer care department so that they can ensure you are registered on our vulnerable customers register.

Technological

Customers who suffer with a technological vulnerability may not have the option to complete tasks using electronic means.

Sometimes, these customers may require assistance in setting up direct debits, making account changes or accessing their customer portal. If you are a customer who requires assistance with this, please contact our customer support team.

Financial Vulnerability

If our customers tell us that they're struggling to pay their bills, we endeavour to provide support where we can. In some cases (based upon supervisor or manager discretion) the following solutions may be available:

- Lowering the customers tariff (speed and price); or
- Allowing pauses in contract; or
- Allowing cancellations of contract.

Some of our customers may be eligible for our social tariff, "County Broadband Essential". If you would like to check your eligibility for this tariff, details of the tariff and the self-serve check and application can be found within your customer portal.

Vulnerability Reporting to Industry Regulators

From time to time, providers may be required to provide information on the requirements of their vulnerable customers to industry regulators such as Ofcom.

The manner of the vulnerability is not reported; however the adaptation / additional requirement is reported as well as the number of users on the vulnerability register.