

Customer Services - Vulnerable Strategy

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Contents

1	Overview	4
2	What is Vulnerability?	4
3	Why vulnerability matters	4
3.1	Our Borough	4
3.2	Equality and Diversity	5
4	Digital Exclusion	5
5	What are the vulnerability categories in the borough?	6
6	How Customers access our services	7
7	Identifying Vulnerable Customers	8
7.1	Age	8
7.2	Mental Health	9
7.3	Health	9
7.4	Learning Difficulties	11
7.5	Addiction	12
7.6	Bereavement	12
7.7	Financial Difficulties	13
7.8	Language Barriers/Public Status	14
7.9	Digital Exclusion	14
7.10	Domestic Violence/Abuse	15
7.11	Marital/Home Status	16
8	Identifying Vulnerable Customers	16
8.1	System Flag	16
9	Training and handling of vulnerable customers	17
9.1	Walks of Life	17
9.2	Handling a difficult caller	17
9.3	6 Step Plan	17
10	GDPR/Data Protection Constraints and regulations (how we manage)	18
10.1	What is GDPR	18
10.2	Constraints of GDPR for vulnerable customers.	18
10.3	Ensuring Compliance with GDPR and Managing Vulnerable Customers	19

Version Control Front Sheet

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1 Overview

The purpose of this document is to outline the different vulnerabilities of our residents within the Borough, explain our understanding and describe how we train staff to support our vulnerable customers to access Council services.

Every organisation has a responsibility to ensure appropriate levels of care for their vulnerable customers. This document sets out to prepare each service with the means to recognise vulnerability and provide practical help and resources to make sure every customer maintains access to the vital services they need.

2 What is Vulnerability?

Vulnerability can be difficult to define and comes in a range of guises and can often be multi layered. Many people that are vulnerable may not diagnose themselves as 'vulnerable' and vulnerability can affect all kinds of service users. Life is full of many challenges, vulnerability can hit anyone at any point in life and can be on a temporary basis or permanent.

'able to be easily physically, emotionally, or mentally hurt, influenced, or attacked:'

Dictionary.Cambridge.Org

In terms of customer service; a vulnerable person could be someone who, due to their personal circumstances is especially susceptible to detriment and who by characteristics and/or circumstances, is unable to act or respond appropriately to certain circumstances. This can also be any individual who is, or may be, in need of help or support due to mental health difficulties, disability, age, illness or frailty and who are, or may be, unable to look after their home and/or their wellbeing or unable to protect themselves from harm or exploitation by others.

3 Why vulnerability matters

3.1 Our Borough

In 2019, there was 318,000 residents in Bromley. From a Mosaic, Grand Index by Experian, we learnt that around 9% of the population are Families with limited resources who budget to make ends meet. 12% of the population are Single people renting low cost homes for the short term or urban residents renting high density housing from social landlords and 4.5% of residents are Elderly people with limited pension income, mostly living alone. Just these 3 Mosaic groups add up to 25.5% of the population categories which may be at risk of some level of vulnerability.

Although there are people that have a higher risk of becoming vulnerable, we understand that most people experience vulnerability at some point in their lives and it can affect anyone at any time. Nobody plans to become vulnerable and few people self-identify as being vulnerable so we need to look out for signs and make sure staff are trained to recognise this and provide support where necessary.

Bromley Council provide key services to its residents such as Benefits, Housing and Social Services. Lack of access to any of these services could cause great hardship and possibly further vulnerability to customers so as an authority, we need to make sure that each department has the required access to what they need from each service line in a way that supports their needs and accessibility.

3.2 Equality and Diversity

Liberata Ltd have an Equality and Diversity policy that not only applies to staff but also ensures that everyone accessing our services are treated fairly. We also have a legal duty to follow the Equality Act 2010 and it's principles to ensure everybody has an equal opportunity, and is not treated differently or discriminated against because of their characteristics.

It is against the law to discriminate against someone because of:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

Some of these categories fall into vulnerability categories within the borough such as age and disability. We need to recognise this and make sure Liberata undertakes to provide the required and desirable level of service to all clients, customers and members of the general public in a manner that is non-discriminatory.

4 Digital Exclusion

As mentioned in 'Why vulnerability matters' we need to make sure all services are accessible to all vulnerable groups. As an organisation, it is easy to focus on our overall objectives for example 65% of Customers transacting online within the next 2 years or a goal of becoming 'Digital by Default' but, like all new developments, a percentage of the population are at risk of not being able to access these new service channels and alternative measures need to be introduced to protect their access.

However there are some vulnerable and disadvantaged groups who are more at risk of being digitally excluded within the UK and these include:

- those in social housing - 37% of those who are digitally excluded are social housing tenants
- those on lower wages, or unemployed - 17% of people earning less than £20,000 never use the internet, as opposed to 2% of people earning more than £40,000. 44% of people without basic digital skills are on lower wages or are unemployed
- those with disabilities - 33% of people with registered disabilities have never used the internet. This is 54% of the total number of people who have never used the internet
- older people - over 53% of people who lack basic digital skills are aged over 65, and 69% are over 55
- young people - 6% of people who lack digital skills are between 15 and 24 years. Only 27% of young people who are offline are in full-time employment
- There are other groups who have a higher tendency to be digitally excluded such as offenders and ex-offenders. Their risk of reoffending drops significantly when digital skills, training and support is used to complement existing approaches. 21% needed help with maths, reading and writing, 41% with their education, and 40% to help improve their work related skills.

Liberata need to be mindful of the above when new services lines bring in new digital services and processes, although we may promote this as a preferred method for the customer to access our services, we need to confirm it is not limited or become difficult for the digitally vulnerable groups to access the said service.

The London Borough of Bromley already has almost the highest percentage in the UK of users who access the internet daily, with over 92%* of residents claiming to have used the internet at some point. It also has one of the highest percentages of households with Internet access, with an increasing number of households (95%*) having some form of broadband coverage.

Increasingly, internet access via a mobile device has also surged in the last few years with a 100%* increase from 2011 in individuals accessing the internet 'on the go' across all age ranges.

*ONS 2013

5 What are the vulnerability categories in the borough?

There are many reasons someone may be vulnerable and the council recognises it can come in many forms. As explained earlier vulnerability can also be temporary, permanent or come in a series of episodes and anyone at any time could potentially be deemed vulnerable. Many of these vulnerabilities cannot be 'seen' therefore worth noting a vulnerable customer may present and look 'normal'. The characteristics or circumstances that **may** lead to identifying a person as vulnerable within Bromley are as follows:

- **Age** – Young Adult, Children, Old, Care Leavers, Fragile due to age
- **Mental Health** – Depression, Personality Disorders, at risk of suicide
- **Health** – Disability, Terminal Illness, Deaf, Blind, Late term pregnancy, Medicated
- **Learning Difficulties** – Cognitive Impairment, Autism, Asperger's, ADHD, Tourette's, Dyslexia
- **Addiction** – Substance abuse (drugs/Alcohol), Gambling
- **Bereavement** – Recent death of spouse/parent/child/friend
- **Financial Difficulties** – Financial impoverishment, Long-term unemployed, Possession proceedings, at risk of homelessness, Debt Management Agency Involvement
- **Language Barriers/Right to reside** – Language difficulties, No right to reside/Immigration, victim of war, minors dealing with parents matters
- **Digital Exclusion** – Lack of internet access, no internet knowledge or know-how
- **Marital/Home Status** – Marital status change (Divorce etc), Empty nest syndrome, Using male privilege
- **Victim on domestic violence/abuse** – Control, physical abuse, emotional abuse and intimidation. verbal abuse

6 How Customers access our services

Bromley Needs Assessment Framework

Vulnerability	Sub Categories	What services they will contact the council for?	How would they access the service?
Age	Young Age Children Old Age Fragility due to age	At risk of ASB Care Leavers Victim of War	<ul style="list-style-type: none"> • Online • Customer Services – Telephone (7.30am-5.30pm R&B / 8.30am-5pm for Corporate Services) • Face-to-face • Local Libraries • Support from Local Charities (ie Age UK)
Mental Health	Personality Disorders Depression Anxiety Bipolar Social Services Involvement At Risk of Suicide	PTSD Schizophrenia Paranoia	<ul style="list-style-type: none"> • On-line • Customer Services – Telephone (7.30am-5.30pm R&B / 8.30am-5pm for Corporate Services) • Face-to-face • Local Libraries • Support from Local Charities (ie Mind)
Health	Disability Fragility due to age Medicated Terminal Illness Late Term Pregnancy Deaf & Blind	Health & Safety Pest Control Housing Streetscene Blue Badges Freedom Passes	<ul style="list-style-type: none"> • On-line • Customer Services – Telephone (7.30am-5.30pm R&B / 8.30am-5pm for Corporate Services) • Face-to-face • Local Libraries • Support from Local Charities (ie Bromley Healthcare, ConnectWell)
Learning Difficulties	Cognitive Impairment Autism Asperger's Attention deficit-hyperactivity disorder (ADHD)	Tourette's Dyslexia	<ul style="list-style-type: none"> • On-line • Customer Services – Telephone (7.30am-5.30pm R&B / 8.30am-5pm for Corporate Services) • Face-to-face • Local Libraries • Support from Local Charities (ie NHS – Learning Disability Team)
Bereavement	Recent death of spouse/parent/child/friend		<ul style="list-style-type: none"> • On-line • Customer Services – Telephone Telephone (7.30am-5.30pm R&B / 8.30am-5pm for Corporate Services) • Face-to-face • Local Libraries • Support from Local Charities (ie Bromley Bereavement Services)
Financial Difficulties	Possession Proceedings Financial Impoverishment Long-term unemployed Debt Management Agency Involvement At risk of Homelessness		<ul style="list-style-type: none"> • On-line • Customer Services – Telephone (7.30am-5.30pm R&B / 8.30am-5pm for Corporate Services) • Face-to-face • Local Libraries • Support from Local Charities (ie Bromley Citizens Advice Bureau)
Language barriers/Public Status	Language Difficulties No right to reside / Immigration At Risk of Homelessness Victim of War Minors dealing with parents matters		<ul style="list-style-type: none"> • On-line • Customer Services – Telephone (7.30am-5.30pm R&B / 8.30am-5pm for Corporate Services) - if the resident has support to translate on the call • Face-to-face (if the resident has support to translate) • Local Libraries • Bromley Council can use translation services
Digitally Excluded	Lack of Internet Access Digital Exclusion		<ul style="list-style-type: none"> • Customer Services – Telephone (7.30am-5.30pm R&B / 8.30am-5pm for Corporate Services) • Face-to-face • Local Libraries
Addiction	Substance Abuse Gambling		<ul style="list-style-type: none"> • On-line • Customer Services – Telephone (7.30am-5.30pm R&B / 8.30am-5pm for Corporate Services) • Face-to-face • Local Libraries • Support from Local Charities (ie Bromley Drug and Alcohol Service)
Domestic Abuse	Control Physical Abuse Emotional Abuse and Intimidation Verbal Abuse Isolation		<ul style="list-style-type: none"> • On-line • Customer Services – Telephone (7.30am-5.30pm R&B / 8.30am-5pm for Corporate Services) • Face-to-face • Local Libraries • Support from Local Charities (Bromley & Croyden Womens Aid)
Marital/Home Status	Recently Divorced Empty Nest Syndrome		<ul style="list-style-type: none"> • On-line • Customer Services – Telephone (7.30am-5.30pm R&B / 8.30am-5pm for Corporate Services) • Face-to-face • Local Libraries • Support from Local Charities (Bromley & Croyden Womens Aid)

7 Identifying Vulnerable Customers

7.1 Age

Young People

Services they might access: Housing, Social Services, Council Tax and Benefits, Education, Planning, Parking Registrars, Elections

How they engage with us: May often want to self-serve and avoid interaction with an agent. Young people's first thought is no longer to pick-up the phone so they may look online first. Services are available online but if it is a more complex query, they may prefer to communicate via email or possibly call the Contact Centre.

How we assist/what is available: Forms are available online for all services, if it is a more complex query, Contact Us Forms are available for the customer to complete. Provide telephone assistance for Revenues and Benefits 7.30am – 5.30pm and for any other corporate services 8.30am – 5.00pm Monday to Friday.

Additional Assistance:

Bromley Youth Support Programme - 020 8466 3080

Change Grow Live - 020 8289 1999

Leaving Care Team - 020 8313 4108

Elderly

Services they might access: Revenues, Benefits, Blue Badges, Freedom Passes, Street and Waste Services, Greenspaces, Electoral Service, Registrars, Social Services and Planning

How they engage with us: As we know from the 'Digital Exclusion' section above, older people - over 53% of people who lack basic digital skills are aged over 65, and 69% are over 55 and we do have to be mindful of that statistic. Although, it is easy to stereotype an older age customer with the thought of them not being able to transact online but an 82 year old lady might be happy to use online forms & systems elderly residents

How we assist/what is available: Customers are able to contact regarding Revenues and Benefits services 7.30am-5.30pm and other Corporate services 8.30am-5pm Monday to Friday. The Civic Centre is also open to the public Monday to Friday 9am – 5pm (Currently appointment only). Elderly customers may also prefer written communication which all services will accept and respond to via letter. The council also have visiting teams for some of their services such as Revenues and Benefits and many of the Adult Social Care Assessments are conducted from home.

Additional Assistance:

Bromley & Greenwich Age UK - 020 8315 1850

Bromley Well – 0808 278 7898

7.2 Mental Health

Mental health can effect customers in many ways: depression, anxiety, bipolar, post-natal depression, PTSD, schizophrenia, paranoia to name a few. Not every customer suffering with poor mental health has the same wants, needs & solutions.

Depression/Anxiety

Services they might access: Housing, Waste Services, Freedom Passes, Registrars, Revenues and Benefits, Social Services, Parking

How they would engage with us: There are many symptoms of depression, including low mood, feelings of hopelessness, low self-esteem, lack of energy and problems with sleep. When customers that may have depression contact, they will want this to be done in their own time and will likely avoid speaking to a person. It is possible they will try and transact online in the first instance.

How we assist/What is available: Forms are available online for all services and a good communication method for this customer may be the Bromley Contact Us forms or email. The customer will also appreciate Link Me Up's being sent to them for ease of access.

Additional Assistance:

Bromley Mental Health – Council assisted project for homeless in Bromley and provides all help for mental health issues, need to be referred through a GP.

Bromley, Lewisham & Greenwich Mind - 01689 811222

Talk Together Bromley – 0300 003 3000 / <https://www.talktogetherbromley.co.uk/>

7.3 Health

Deaf & Blind

Services they might access: Revenues & Benefits, Waste Services, Blue Badge, Freedom Pass, Education, Electoral Services, Planning and Social Services

How they would engage with us: A visually impaired customer may want to transact over the phone or the web with assistive technology. Residents that are hard of hearing may prefer to transact via the web or email.

How we assist/What is available: It can be very frustrating for the customer if we are directing to them towards something inappropriate for them – for example directing a blind person online. A blind customer may wish to come to the Civic Centre where assistance dogs are welcome. We can request written letters and emails to be sent in large print and this request can say on their account for future correspondence. If the customer is deaf, all services can be accessed online and another communication method if struggling on the website is the Bromley Contact Us forms. The customer could also write or email in to designate a representative to be able to discuss their account.

Additional Assistance:

Kent Association for the Blind (KAB) - 01622 691357/ enquiry@kab.org.uk

Royal National Institute for the Blind – 03031239999

Blind Veterans UK – 08003897979

Deaf Umbrella Ltd - 0333 700 7474

Bromley Healthcare – provide a range of high-quality services, clinics and health programmes, from pre-natal care to support for the elderly - 0300 330 5777

Physical Disability

Services they might access: Revenues & Benefits, Waste Services, Street Services, Greenspaces, Blue Badge, Freedom Pass, Education, Planning, Electoral Services and Social Services, Health & Safety, Pest Control, Housing, Parking

How they would engage with us: Customers preference of engagement method may vary if disabled, many residents will transact online for ease and availability to do this at any time of day. Others may prefer assistance over the phone. The Civic Centre does have disability access.

How we assist/What is available: All mentioned services are available online 24 hours a day and if the query is more complex, contact us forms are available. Link Me Up's can also be sent to the customer to take them directly to the web page they need. Telephone assistance is available for Revenues and Benefits services 7.30am-5.30pm and other Corporate services 8.30am-5pm Monday to Friday. The Civic Centre also has disability access and is also open to the public Monday to Friday 9am – 5pm (Currently appointment only).

Additional Assistance:

Bromley MenCap – 0208 466 0790

Bromley Citizens Advice Bureau (CAB) - 0808 2787 898

<https://www.gov.uk/financial-help-disabled>

Terminal Illness

Services they might access: Revenues & Benefits, Housing, Waste Services, Blue Badge, Freedom Pass, Registrars, Education and Social Services

How they would engage with us: A customer with a terminal illness may want to transact in their own time with the help if required, possibly online to avoid speaking to a person if they are very ill. Although they may have complex needs or circumstances which they would like to discuss with a person.

How we assist/What is available: Online forms and Contact Us forms would be a good way of communication and Link Me Up's can be sent to direct customers online easier.

Customers are able to contact via phone regarding Revenues and Benefits services 7.30am-5.30pm and other Corporate services 8.30am-5pm Monday to Friday.

Registrars deal with those with a terminal illness Registrars General License Marriage (death bed marriage) and waivers to speed up the process for those terminally ill.

Additional Assistance:

Bromley Healthcare – provide a range of high-quality services, clinics and health programmes, from pre-natal care to support for the elderly - 0300 330 5777
Marie Curie – 0800 090 2309

7.4 Learning Difficulties

Cognitive Impairment / Dementia

Cognitive Impairment usually refers to problems effecting memory loss but could involve a change in problem solving, concentration or attention. A person with cognitive impairment is more likely to develop Dementia.

Services they might access: Housing, Waste Services, Blue Badges, Freedom Passes, Registrars, Revenues and Benefits, Social Services

How they engage with us: A customer with cognitive impairment has trouble remembering, learning new things, concentrating, or making decisions that affect their everyday life. Due to this they will need support with the decisions they make. Therefore they will likely access our services via the phone or face-to-face at the Civic Centre. They will often have a relative, friend or representative call on their behalf or prefer to write things down so may communicate via letter.

How we assist/what is available: We can communicate with customers via letter so they then have this to remind them of situations and processes. If the customer has designated and declared a representative, we will contact them to avoid confusion for the resident. Also, they can call the contact centre or visit the Civic centre.

Additional Assistance:

Alzheimer's Society Bromley – 02084609245 – offers support, advice, financial advice

Autism Spectrum Disorder (ASD)

Autism is a development disability caused by differences in the brain and the abilities of people with Autism can vary significantly. For example, some people with ASD may have advanced conversation skills whereas others may be nonverbal. Some people with ASD need a lot of help in their daily lives; others can work and live with little to no support. Customers with Autism may find it hard to communicate and interact with other people and in turn find it hard to understand how other people think or feel. It is possible they'll take longer to understand information or do/think the same thing over and over. They may get anxious or upset about unfamiliar situations, loud noises and music. We need to understand that being autistic does not mean you have a disease or illness that needs treating. It means your brain works in a different way to others.

Services they might access: Revenues & Benefits, Housing, Waste Services, Blue Badge, Greenspaces, Freedom Pass, Education, Planning, Parking and Social Services

How they would engage with us: A customer with Autism may avoid face-to-face situations and will likely try to transact themselves online. If not they may call the Contact Centre.

How we assist/What is available: Online forms and Contact Us forms would be a good way of communication and Link Me Up's can be sent to direct customers online easier. Customers are able to contact via phone regarding Revenues and Benefits services 7.30am-5.30pm and other Corporate services 8.30am-5pm Monday to Friday.

Additional Assistance:

Bromley Mencap – 0208 466 0790

Dyslexia

Dyslexia causes problems with certain abilities used for learning, such as reading or writing.

Services they might access: Housing, Waste Services, Freedom Passes, Registrars, Revenues and Benefits, Social Services, Parking

How they engage with us: – A customer with learning difficulties may find it hard to transact online and complete forms if they struggle to read and write

How we assist/what is available: The customer may need the support from an advisor to take the information for them. We need to support these customers in this process therefore they can call the Contact Centre or come into the office at the times stated above. Social Services also complete a lot of their assessments face-to-face.

Additional Assistance:

Adult Early Intervention Service (Bromley Borough Council) - 020 8461 7777

Bromley Well – advice and guidance for carers as well as intensive support for crisis & emergency, they provide home visits and support groups to attend

7.5 Addiction

Addiction is a term that means compulsive physiological need for and use of a habit-forming substance. The addiction could be drugs, alcohol or gambling related and this vulnerability can intertwine with others such as mental health issues. It is likely the customer won't let u know they are dealing with addiction so we need to make sure we are treating every customer fairly to make sure they all have access to all services required.

Services they might access: Revenues & Benefits, Housing, Waste Services, Registrars, Education and Social Services

How they would engage with us: Customers suffering with addiction may avoid contacting us, or leave going so to a time when things become more difficult for them such as further recovery action on Council Tax. The resident may try contacting via email or online to explain their circumstances or contact via phone if they are uncertain of what to do to resolve their query. It might be that they do not have access to the internet or a phone, in these circumstances, face-to-face interaction may be their only option.

How we assist/What is available: Webforms and Contact Us Forms for the customers that would prefer to transact online, some departments also have email address that can be used. Customers are able to contact via phone regarding Revenues and Benefits services 7.30am-5.30pm and other Corporate services 8.30am-5pm Monday to Friday. The Civic Centre is also open to the public Monday to Friday 9am – 5pm (Currently appointment only) and there are phones available to each department.

Additional Assistance:

Bromley Drug & Alcohol Service (BDAS) – for addiction help. - 020 8289 1999

GamCare (Gambling Support) - 020 7801 7008

7.6 Bereavement

Bereavement is the period of grief and mourning we go through adjusting to the loss of someone close to us. The death of a loved one is probably the single most difficult challenge we will face in our life time.

Grief can sometimes leave people feeling overwhelmed and it affects people in all sorts of ways. If you experience the death of someone who is very important to you, it can be difficult adjusting to the immense changes happening in your life. Losing a loved one presents many challenges and in addition to dealing with the emotional pain, you may also be worrying about the practical issues that can follow bereavement.

Services they might access: Revenues & Benefits, Housing, Registrars, Blue Badge, Freedom Pass, Education and Social Services

How they would engage with us: Residents may look for the easiest way to inform the council of a death so they do not need to contact multiple departments. It is possible they may want to speak to a person over the phone or face-to-face rather than online due to the sensitive subject matter of informing of a death. Bereavement can often link to other vulnerabilities such as depression, if that is the case the customer may want this to be done in their own time and will likely avoid speaking to a person. It is possible they will try and transact online in the first instance.

How we assist/What is available: Tell Us Once Service - Tell Us Once is voluntary to use and very helpful. It enables you to report a death only once, telling central and local government services securely and confidentially without you having to inform them individually. This includes council services such as council housing, housing benefit, council tax, Blue Badge and remove the person from the electoral register, HMRC, DWP, DVLA and Pensions Services.

Customers are able to contact via phone regarding Revenues and Benefits services 7.30am-5.30pm and other Corporate services 8.30am-5pm Monday to Friday. The Civic Centre is also open to the public Monday to Friday 9am – 5pm (Currently appointment only) Also, Web forms and Contact Us forms for the customers that would prefer to transact online, some departments also have email address that can be used

Additional Assistance:

Bromley Bereavement Services – 0208 768 4595
Cruse Bereavement Care – 0808 808 1677

7.7 Financial Difficulties

Many people experience problems with their finances at some stage of their lives. And they may experience such problems because they've had an unexpected change in their personal or financial circumstances. For example, they may have lost their job or suffered an illness that has stopped them from working for an extended period. This change in circumstances can mean that they have to manage with a reduced income. And this in turn can lead to them experiencing difficulty meeting their existing financial commitments, such as repayments to outstanding credit.

Services they might access: Revenues & Benefits, Business Rates, Housing, Waste Services, Education and Social Services, Parking, Registrars

How they would engage with us: Residents may first see if their query can be dealt with online to avoid speaking to a person. If not, they will call to resolve the issue.

How we assist/what is available: Online platforms for Revenues and Benefits. Link Me Up's available for Customer Service staff to send to customers to make it easier to find what they need online. Bromley Welfare Fund - Council based fund to help Bromley residents on low incomes, it can provide temporary accommodation, help to buy beds, cookers, fridges and freezers. Customers are able to contact via phone regarding Revenues and Benefits services 7.30am-5.30pm and other Corporate services 8.30am-5pm Monday to Friday.

Additional Assistance:

Bromley Welfare Fund
Breathing Space -
Citizens Advice Bureau (CAB) - 0808 278 7898
Christians Against Poverty (CAP) - 07754 934722
Job Centre Plus – 0800 169 0190
[Gov.uk](https://www.gov.uk)

7.8 Language Barriers/Public Status

Experiencing language barriers can easily cause frustration on both the advisors and customer's side, while preventing advisors from providing accurate and efficient customer service to your clients. Also, not every customer has the right to claim benefits or have access to any public funds, this applies to a person who is 'subject to immigration control' in the UK. If a customer doesn't have the right to reside this can be an upsetting process for them, we can direct customers to the support available.

Services they might access: Revenues & Benefits, Housing, Waste Services, Street Services, Blue Badge, Freedom Pass, Education, Elections, Planning, Parking and Social Services

How they would engage with us: Customers with language barriers may try transacting online first with support from family or friends. They then may contact via phone or face-to-face and may bring a third party to support and translate (friend or family member) They may also get the third party to write a letter or email.

How we assist/What is available: All services are accessible online 24 hours a day and the text from the website can be translated using the 'Select Language' drop down box at the bottom of each page. Link Me Up's can also be sent to make it easier to direct the customer to find what they need. Customers are able to contact via phone regarding Revenues and Benefits services 7.30am-5.30pm and other Corporate services 8.30am-5pm Monday to Friday. The Civic Centre is also open to the public Monday to Friday 9am – 5pm (Currently appointment only). Agents will go through data protection checks with the caller to be able to discuss with a third party. The local authority has the power to provide emergency housing and/or financial support to a family when a child's welfare is at risk whilst assessments or enquiries are being carried out. Departments are responsible for finding out if a customer needs communication support and must offer appropriate translation and interpretation services; they may use a mix of bilingual staff, community organisations and professional interpreters and translators. A list of foreign language speakers is available on the LBB intranet.

Additional Assistance:

Refugee Council - 0808 196 7272
Migrant Help - 0808 8010 503

7.9 Digital Exclusion

Despite the transformative impact of technology on society many people remain digitally excluded. Those who are excluded digitally are also far more likely to be disadvantaged according to many other social and economic measures. The digital divide exacerbates inequality. Digitally-excluded people can lack skills, confidence and motivation, along with having limited or no access to equipment and connectivity.

Services they might access: Revenues & Benefits, Waste Services, Street Services, Greenspaces, Blue Badge, Freedom Pass, Education, Social Services, Planning, Parking Registrars and Elections.

How they would engage with us: Online is not possible for digitally excluded customers. They will engage with us via phone or face-to-face. They may get support online from friends or family.

How we assist/What is available: Customers are able to contact via phone regarding Revenues and Benefits services 7.30am-5.30pm and other Corporate services 8.30am-5pm Monday to Friday. The Civic Centre is also open to the public Monday to Friday 9am – 5pm (Currently appointment only). There is also Bromley out of hours service for emergencies that need reporting at the time when the lines are closed. Residents can also access the internet at Bromley's libraries and often then provide digital sessions and support.

Additional Assistance:

Age UK (Currently offering Digital Support Sessions) – [info@ageukbandg.org.uk/020 8315 1850](mailto:info@ageukbandg.org.uk/020_8315_1850)

Bromley Libraries - <https://www.bromley.gov.uk/libraries>

Cotmandene Community Resource Centre - [Cotmandene Community Resource Centre | Cotmandene Community Resource Centre | London Borough of Bromley](#)

Mottingham Community and Learning Shop - [Mottingham Community and Learning Shop | Mottingham Community and Learning Shop | London Borough of Bromley](#)

7.10 Domestic Violence/Abuse

Domestic Abuse can take many forms, from physical abuse, control, emotional or verbal abuse and financial abuse along with more. Any incident or pattern of these behaviours are defined as domestic abuse. Domestic abuse is perhaps most commonly thought of as violence between partners, but it can take many other forms and be perpetrated by a range of people. Domestic Abuse can also lead to other vulnerabilities such as depression, anxiety, long-term health conditions and financial vulnerabilities.

Services they might access: Revenues & Benefits, Housing, Waste Services, Street Services, Parking, Education, Registrars, Elections and Social Services, Noise/ASB Team

How they would engage with us: Residents experiencing domestic violence may engage with us online to avoid communicating with a person due to their feelings of isolation or possible poor mental health, they will unlikely come into the office face-to-face unless they are wanting support. We need to make sure we notice this when it happens and pick up on signs of this from customers (looked at in training) If the customer is struggling online, they may call the Contact Centre.

How we assist/What is available: All services are accessible online 24 hours a day. Customers are able to contact via phone regarding Revenues and Benefits services 7.30am-5.30pm and other Corporate services 8.30am-5pm Monday to Friday. Although this is the case, we want residents talk to get the help they need, therefore if we notice potential domestic abuse or a customer discloses this, we need to follow the safeguarding policy.

Additional Assistance:

Bromley & Croydon Women's Aid – 0208 313 9303

7.11 Marital/Home Status

A household change can really effect a person, is the customer going through a divorce? Are they recently married/cohabiting and struggling to adjust?

Services they might access: Revenues & Benefits, Housing, Waste Services, Education, Registrars, Elections and Social Services, Noise/ASB Team

How they would engage with us: A resident struggling with a marital or home change could engage with us via either of our methods, possibly more likely via phone as they might not be sure what to do or want to ask questions and prefer to speak to a person.

How we assist/What is available: All services are accessible online 24 hours a day and Link Me Up's can also be sent to make it easier to direct the customer to find what they need. Customers are able to contact via phone regarding Revenues and Benefits services 7.30am-5.30pm and other Corporate services 8.30am-5pm Monday to Friday.

Additional Assistance:

Novo Mediation (mediation divorce services) – 0800 612 4426 / info@novomediation.co.uk

8 Identifying Vulnerable Customers

We need to make sure that all staff, whether face-to-face, over the phone or email can recognise all types of vulnerabilities and quickly pick up any signs of vulnerability to be able to deal with the enquiry in the appropriate way. It may be easy to stereotype customers, especially

As a simple best practice, for identifying vulnerable customers, a call agent should first proceed with CARE – picking up four signs under this acronym to assess customer vulnerability.

- **Comprehend** – Is the customer following and understanding the discussion taking place?
- **Assess** – Is the customer able to work out what they are being told?
- **Retain** – Is the customer able to retain and remember the information you give them? Re you often needing to repeat things or explain in a different way?
- **Evaluate** – Is the customer able to properly express, explain or communicate their decisions? Are they genuinely contributing to the discussion or merely agreeing with what you are saying.

8.1 System Flag

Across each of Bromley Council's departments, different systems are used to access customer data and log reports. Some of these systems allow us to put a flag on the account of a vulnerable customer, so we can give vulnerable customers the best possible support when they need it. . Once set up, the flag will stay on the account and there is no need for the customer to tell us every time they call in. Accounts with the flag can also have an important notepad entry, to explain the kind of support the customer needs.

Academy

Academy is used for Revenues, Benefits and Business Rates. A flag can be added thorough the creating of a notepad to the Revenues and Business Rates system by going to the notepad. This then puts the alert below on the customer account, this can be seen at the top of the screen every time the account is open. We can highlight the type of vulnerability as an important notepad alongside the flag.

9 Training and handling of vulnerable customers

Liberata understands that for our vulnerable customers to get the best service where they feel supported, training of our staff is key to provide them with the required understanding and tools to do this.

9.1 Walks of Life

As part of Liberata's Customer Service Training, all employee's take part in a session called 'Walks of Life'. In this training session, staff learn the different types of vulnerabilities, advice on how to recognise it and the best way to support vulnerable customers. Along with supporting agencies and charities to direct the customer to if required.

Advisors also go through the '3 R's'. By approaching each interaction with the customer this way, we are providing structure to the call to make it easy for the vulnerable customer to follow and creates purpose to what you are saying:

- Try and **relate** to the customer – this should help you empathise with the customer's situation and be more understanding throughout the call.
- Try and **reassure** the customer – we are there to help & you must reassure you will do that, if you genuinely want to help the customer this will come across & the customer normally will become reasonable once they understand you do care
- Try and **resolve** the query – the customer may feel like you haven't resolved the query due to procedures however the resolution may be; talking to someone, gaining advice on next steps & procedure, booking an appointment, directing to organisations with expertise in an area where they are struggling.

9.2 Handling a difficult caller

With the kinds of services we deliver, sometimes we have to be prepared to deal with challenging customers, specifically those that are unhappy who could then become irate.

Whether over the phone or face to face, aggression from customers can be scary, we cover this in training to provide advisors with the skills needed to achieve a successful resolution.

Anger is a protective emotion, often activated by a dual perception of vulnerability and threat. The more vulnerable we feel, the more threat we perceive.

In training we look at different theories such as the PAC Ego - The Parent, Adult, Child Ego explores how our attitude & behaviours effect the customers and how these different states can get different reactions.

Conflicted management is also looked at with 'Handling Difficult Callers', from the meaning of conflict, different conflict management styles and a quiz to find out your own conflict management style. This helps advisors understand their own personalities and conflict management styles and in turn, understanding different customers.

9.3 6 Step Plan

It is possible, due to the nature of the calls we handle that vulnerable customers might say they intend to harm themselves or family members that are in the household with them. It is important that systems,

procedures and responses are in place and that members of staff know what to do if a customer says they intend to harm themselves. Liberata's 6 Step Plan is as follows;

1. Take the statement seriously – remain calm, listen & ask gentle questions. Give the customer your full attention & let them know you are there to help.
2. Seek help – do not put the caller on hold but alert a supervisor/manager (they will listen in)
3. Gather Information – talk to them, assess the risk. Are they at home, are they with anyone? We need as much information as possible to pass to the emergency services.
4. Provide referral advice – this could be GP, Mind, family, CAB (depending on the issue will depend where you refer the customer to)
5. Seek emergency help – the manager/supervisor listening in will call the emergency services. We do not need the customers consent to contact the emergency services.
6. Review – after the incident you may want to take time with your manager to discuss the call or contact our EAP.

As well as the above, we provide staff with call listening to live calls and mentors for support when agents start dealing with customers either on the phone or face-to-face.

10 GDPR/Data Protection Constraints and regulations (how we manage)

10.1 What is GDPR

The General Data Protection Regulations (GDPR) is the data protection law that was put into effect on the 25th May 2018 and applies to most UK businesses and organisations. It governs the processing of personal data and is used alongside the data protection act 2018.

It is imperative we comply with GPDR to avoid penalties and reputational damage and we need to know who we are sharing residents data with and why. A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed. So this means more than just loss of data, it also includes data being accessed inappropriately or by someone unauthorised to have such access to that data. If we breach GDPR, we must notify the ICO.

10.2 Constraints of GDPR for vulnerable customers.

Protecting vulnerable consumers and treating them fairly is a key focus for us. When speaking to a resident about some of our services, we must ascertain that we are speaking to the account holder of the account the caller is wanting to discuss for their own security. We need to confirm their name and address and ask 2 additional security questions before discussing and disclosing anything on the account. Advisors have a desk aid to follow with the questions they can ask the customer.

On occasion, vulnerable customers can find it difficult to answer these questions, whether it be due to memory loss, learning difficulties, previously accounts being dealt with by spouses or many other reasons. GDPR is a regulation we have to follow and these questions do need confirming and we cannot avoid asking them in this circumstance. The advisors are trained to be mindful of this and understand they may need to give the customer more time. They may also ask the customer questions such as; Do they need to go and check something to get the answer? Would it be better if we call them back at a later time? Is there someone else available that can support them?

Vulnerable customers often have relatives, friends or representatives interact with Bromley Council on their behalf. We cannot speak to a 3rd party without clear verbal or written consent from the party concerned, even if the person confirmed data protection questions. If we receive verbal consent, it is only

valid for that call or visit. If we receive written consent, it will remain on the account until the account older advises otherwise.

10.3 Ensuring Compliance with GDPR and Managing Vulnerable Customers

To ensure our staff are complying with GDPR procedures, they firstly go through Data Protection and GDPR training so they understand what it is, why it is necessary, what happens if we do not comply and how it effects their role so they know what is needed.

Secondly, each agent have the required amount of their calls listened to by a Supervisor or Team Leader to make sure that our GDPR policy is being adhered t and they're asking the required questions of the customer. If they do not follow the required procedure, the agent fails the call and will go through additional training, if this is repeated a formal plan is required.

Although we need to follow this procedure, we understand that some vulnerable customers may not be able to answer some of the required questions, whether this be due to cognitive reasons or language barriers for example. In this circumstance, we may ask if the customer has anyone to support them that they would be happy with us speaking with.