



JWS Home Improvements Ltd

Unit 4 Millfield Business Park
Millfield Lane
Haydock
St Helens
WA11 9UT
01744 747030
Company Number: 07581714



Vulnerable Consumers Policy

Purpose

The purpose of this policy is to ensure that the operations of JWS Home Improvements Limited do not have any negative impact upon vulnerable consumers.

For the purpose of this policy vulnerable consumers are customers and prospective customers whose ability or circumstances require us to take extra precautions in the way that we sell and provide our services in order to ensure that they are not disadvantaged in any way.

Identifying a vulnerable consumer

When engaging with customers over the phone it is often difficult to identify a vulnerable consumer because it is not possible to see many of the characteristics, such as body language and facial expressions, which may identify whether prospective customer requires additional information and guidance to enable them to make an informed decision. For this reason, it is critically important to listen carefully to all customers and to identify people who may be classed as a vulnerable consumer.

Typical Telephone characteristics include:

- An inability to hear or understand what is being said
- Repeated questions of a similar nature
- Comments or answers which are inconsistent with the telephone discussion or which indicate they have not understood the information which has been provided.
- Verbal confirmation that they don't understand or that they require the assistance of somebody else in making a decision.

When assisting with signing up consumers we always engage with customers face to face. When doing this the same characteristics are likely to be evident, but body language and facial expressions may also assist in identifying the vulnerability.

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What to do if we are engaging with a vulnerable consumer

Just because somebody is vulnerable does not automatically mean that they are unsuitable for the products and services the firm supplies. As soon as we think we may be engaging with a vulnerable consumer we should immediately make a record of the same and ensure we adhere to this policy.

When communicating with the vulnerable consumer we:

- Provide additional opportunities for the customer to ask questions about the information we have provided.
- Continuously seek confirmation that they have understood the information that has been provided.
- Ask if there is anybody with them who is able to assist them and offer and offer them the opportunity to have a family member or friend present during any further conversations/meetings.
- Offer them the opportunity to complete the transaction after a period of further consideration.

If for any reason we think the customer does not understand the service which is being offered to them we will not proceed with the transaction and advise them that we will write to them with further information about the product or services they are seeking.

What is mental capacity?

Mental capacity is a person's ability to make a decision. Whether or not a person has the ability to understand, remember and weigh-up relevant information will determine whether he is able to make a decision based on that information. The person will also need to be able to communicate his decision.

The mental capacity of a person may be limited in a way which prevents him from being able to make certain decisions because of an impairment of, or disturbance in the functioning of, his mind or brain.

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Making decisions

Mental capacity is always defined in relation to a specific decision at a specific time. Consequently, when considering a request for a product or service we should take account of the customer's circumstances at the time at which their request is made. We should take appropriate steps to identify whether or not the customer appears able to understand, remember, and weigh-up the information and explanations provided to them, and, when having done so, make an informed decision.

Mental capacity limitations can be either permanent or temporary (or be fluctuating over time). Consequently, the fact that a person may not have had the mental capacity to make a particular type of decision in the past, does not necessarily mean that they currently do not have, or will never have, the capacity to make such a decision

Mental capacity limitations may also be partial. Under such circumstances the person concerned is likely to be able to make some decisions but not others. Decisions that may require the understanding, remembering and weighing-up of relatively complex information, are likely to be more challenging for many individuals with mental capacity limitations than more straightforward decisions.

Any information gathered will be processed in line with GDPR and the Data Protection Act 2018. Where necessary, explicit consent will be obtained from a customer to enable us to process the details of their vulnerability accordingly. Customers will also be fully informed of how we will process this information.

We will always:

- **Ask for a customer's explicit consent in order to record, store or process the details of their vulnerability, where it is necessary and appropriate to do so**
- **Clearly explain to the customer why we need to record, store or process the details of their vulnerability**
- **Clearly explain to the customer who the details of their vulnerability will be shared with**

Typically, we would only look to process the details of a customer's vulnerability where we may need to tailor our approach during our communications with them, or when we are entering their home for the purposes of a sales consultation or installation. We would therefore only share the details of the vulnerability with the relevant staff and representatives.



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END OF POLICY

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