



# Consumer vulnerability

**How CPIN plays a vital role in improving outcomes for vulnerable consumers**

## **BSI Consumer & Public Interest Network (CPIN)**

CPIN is an independent network of volunteers trained to represent the UK consumer voice in standards. CPIN focuses its work in five priority areas:

- Consumer safety
- **Consumer vulnerability**
- Digital
- Services
- Sustainability



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## Recognition of consumer vulnerability

Vulnerability has risen up the consumer protection agenda in recent years. At an international level, the United Nations considers understanding of consumer vulnerability to be central to delivering effective and inclusive legislation, enforcement and redress. The UN Guidelines for Consumer Protection, revised in 2015, cite the protection of vulnerable and disadvantaged consumers as a key principle to be taken into account by governments, policy makers and businesses.

In the UK, leading organizations are working to raise awareness of the issues and drive improvements. This is particularly important when it comes to the delivery of essential services, such as financial services, energy, water and telecoms, where harm could be potentially life-changing. So, it is reassuring to see UK regulators in these sectors, such as the Financial Conduct Authority, Ofgem, Ofwat and Ofcom, striving to increase business understanding and encourage good practice.

UK charities and consumer groups have led the way in raising awareness, but some forward-thinking businesses, such as banks, energy providers and water companies, have developed policies to deal with consumer vulnerability.

### Factors that may contribute to vulnerability



#### Cognitive impairment

- Dementia
- Illness or injury that affects mental capacity
- Learning difficulties, e.g. dyslexia
- Mental health issues e.g. depression, anxiety



#### Physical impairment

- Hearing loss, deafness, tinnitus
- Reduced physical mobility
- Visual impairment



#### Personal circumstances

- Addiction e.g. alcohol, drugs or gambling
- Bereavement
- Caring responsibilities
- Financial e.g. low income, debt
- Lifestyle changes e.g. having a baby, separation, divorce
- Limited technological capability e.g. no access to internet or computer
- Loneliness/isolation
- Low level of literacy or numeracy
- Old age (increased chance of cognitive or physical impairment)
- Serious illness of self, partner or family member
- Youth or inexperience

<sup>1</sup> <https://unctad.org/en/Pages/DITC/CompetitionLaw/UN-Guidelines-on-Consumer-Protection.aspx>

<sup>2</sup> <https://www.citizensadvice.org.uk/about-us/policy/policy-research-topics/consumer-policy-research/consumer-policy-research/tackling-consumer-vulnerability/>

<sup>3</sup> <https://www.fca.org.uk/publications/occasional-papers/occasional-paper-no-8-consumer-vulnerability>

<sup>4</sup> CPIN Stakeholder Workshop on Consumer Vulnerability, London, January 2019

Consumer vulnerability can be caused by a wide range of factors, such as illness, disability or personal circumstances, which may change over time. (See box 'Factors that may contribute to vulnerability')

It is a common misperception that vulnerability only affects certain groups of people. In reality, vulnerability can affect anyone at any time and doesn't, by itself, always lead to harm. People in vulnerable situations may be more susceptible to harm when interacting with providers of goods and services. For example, they might struggle to understand information, compare options, access suitable products and services or make decisions in their best interests. But how organizations treat consumers can make things better or worse.

If organizations fail to meet the needs of people in vulnerable situations, there is a greater chance that the interaction will result in a negative outcome - such as losing money, being unable to access a product or

service, ending up with something unsuitable, or struggling to make a complaint. However, if there are systems and procedures in place to support consumers in vulnerable situations, the risk of financial, physical or emotional harm can be minimized.

It is crucial that organizations understand the wide range of difficulties that consumers may be facing, and how best to provide support. The key is to provide accessible products and inclusive services that can be used by the largest possible number of people, and to adopt a flexible approach that can be adapted to meet the varied needs of individuals, providing the best possible outcome for each.



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## The value of standards

Standards can play a vital role in improving outcomes for vulnerable consumers, by detailing good practice for organizations such as government, public authorities, manufacturers, retailers and service providers. They can encourage organizations to think about accessibility and inclusivity at each stage of design, development and delivery of products, processes and services. BSI's Consumer and Public Interest Network makes sure that the needs of vulnerable consumers are considered in the development of all relevant standards.

Standards can help providers of services, such as financial, health, tourism and retail, to be inclusive. UK vulnerability experts agree that key principles should be embedded in organizational culture, and reflected in systems, policies and procedures. Staff training is central to success, so that they can identify consumers in vulnerable situations, encourage conversations to understand individual needs and provide a flexible response. BS 18477: Inclusive Service Provision, published in 2010, was a ground-breaking standard offering guidance to businesses on how to identify and respond to consumer vulnerability. Following the success of this standard in the UK, and recognizing that vulnerability is a global issue, it was agreed that the standard be updated as an international standard (ISO 22458).

Standards can also specify good practice in accessible design, such as domestic appliances, packaging, public buildings, houses and websites. BS EN 17161 Design for All specifies requirements for organizations to deliver products and services that can be accessed, understood and used by the widest range of users, including people with disabilities.

## Key consumer issues

Consumer vulnerability is relevant to a wide range of products and services and thinking about the key consumer principles can ensure that consumer issues are addressed and nothing vital is missed.

### Access

Consumers have a wide range of accessibility requirements and products and services should be accessible to the largest number of people possible. For example, hotels should think about ease of access for all, including people with visual impairments and wheelchair users. Service providers should offer a choice of contact methods for customers and simplify routes of access, for example by reducing the number of options on an automated phone system or minimizing the number of staff a customer has to speak to.

In some cases, organizations will need to limit access to particular groups of consumers. For example, manufacturers of medicines must make them difficult for children to open, while ensuring access for older people. Some service providers provide tools to enable people struggling with addictions to self-regulate their spending. For example, Barclays Bank allows customers to block spending with certain retailers, such as betting shops, online gambling sites and pubs.

### Choice

Consumers in vulnerable situations may struggle to compare options and understand the implications of different choices. For example, someone living with dementia might find it difficult to choose the best energy supplier and tariff. Or someone who has recently lost their partner might be more susceptible to aggressive sales techniques from a double-glazing salesperson.

Although the internet can be a useful research tool, the number of choices can be confusing or misleading. Growing reliance on digital services can also limit choice for some, as not everyone has access to a computer or the internet.

## Information

Vulnerable consumers might find it difficult to understand written or verbal information, due to learning difficulties, visual impairment, or low levels of literacy. Where information contains terms and conditions or important safety instructions, understanding is critical. All published information should be written in clear, simple language, and available in a variety of formats. Key facts, or important changes, should be clearly highlighted and, where possible, checks should be in place to make sure details have been fully understood. Staff should be trained to give additional explanations where needed.

## Redress

Consumers in vulnerable situations may find it difficult to understand their legal rights, or to assert those rights when things go wrong. The complaints process should be clearly spelt out, in a range of different formats. Staff dealing with complaints should be aware of issues associated with consumer vulnerability. Consumers in vulnerable situations should also be able to complain if they feel that they have been treated unfairly.

## Representation

It is important that organizations work with groups representing vulnerable consumers to better understand their needs and abilities. If user testing can be built into the design stage, products and services are more likely to meet the needs of consumers, avoiding problems later down the line, reducing complaints and building consumer trust.

## Safety

Consumers in vulnerable situations may find it more difficult to assess risks, understand safety advice and respond to problems. Manufacturers need to think about the wide range of people that might come into contact with their product, not just the intended users. For example, cookers must be made safe for children who might touch them, as well as older people who might have slower reactions or faster burn times. Service providers should have plans in place to identify vulnerable consumers and ensure that they are adequately protected in the case of emergency. This is particularly important when it comes to the delivery of essential services, such as energy. UK energy suppliers must have a Priority Services Register (PSR) that lists vulnerable customers so that they can provide extra help and support where needed. For example, give advance warning of power cuts to people who run medical equipment at home.

The growth of digital technology poses additional risks to consumer privacy and security, which must be considered.

## Sustainability

Specialist products cost more to make. A Design for All approach that develops products and services from the outset that can be used by people with a wide range of needs and abilities, is more cost-effective, less wasteful and better for the environment. Organizations also have a responsibility to help vulnerable consumers make sustainable and ethical choices.



## What is CPIN?

BSI's Consumer & Public Interest Network is an independent network of volunteers trained to represent the UK consumer voice in standards. Funded by the British Standards Institution (BSI) with additional support from the Department for Business, Energy and Industrial Strategy, CPIN works closely with consumer and public interest organizations to:

- Ensure that standards address real issues that matter to real people
- Represent the voice of all consumers, including children, older people and those with disabilities
- Add value to standards and help to build consumer confidence and trust in businesses that use them

CPIN focuses its work on its five priority areas, where there is high potential for consumer detriment, in order to improve outcomes for consumers and minimize harm.

## Further information

### BSI

UK's national standards body. To find out more about standards or to get involved:

[bsigroup.com](https://www.bsigroup.com)

[@bsi\\_UK](https://twitter.com/bsi_UK)

### ISO COPOLCO

Consumer Policy Committee of the International Organization for Standardization

[iso.org/copolco](https://www.iso.org/copolco)

[@ISOConsumers](https://twitter.com/ISOConsumers)

### ANEC

European consumer voice in standards

[anec.eu](https://www.anec.eu)

[@anectweet](https://twitter.com/anectweet)

### Consumers International

A membership organization that brings together 200+ consumer groups worldwide

[consumersinternational.org](https://www.consumersinternational.org)

[@consumers\\_int](https://twitter.com/consumers_int)

For more information about CPIN, or to find out how to get involved, email [consumer@bsigroup.com](mailto:consumer@bsigroup.com) or visit [bsigroup.com/consumers](https://www.bsigroup.com/consumers).



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