

Ofcom Treating vulnerable customers fairly guide – Proposals to amend the guide to help ensure customers in debt or struggling to pay are treated fairly

Introduction

Citizens Advice Daventry & District welcome the opportunity to respond to the Ofcom proposals to amend the *Treating vulnerable customers fairly guide* (referred to as TVCF in this response document).

Citizens Advice Daventry & District is a member of the National Citizens Advice service and fully supports the twin aims of Citizens Advice of:

- To provide the advice people need for the problems they face, and
- To improve the policies and practices that affect people's lives

We fully support Ofcom regarding the importance of having the right level of protections in place for vulnerable customers in debt or struggling to pay.

We note that in the Ofcom's plan of work 2022/23, there is a commitment to:

Supporting vulnerable customers. We will monitor whether providers are treating customers in vulnerable circumstances fairly and giving them the support and services they need. This will include contributing to joint policy work with the UK Regulators Network to improve outcomes for vulnerable consumers.

In the course of gathering information to support our response to the proposed changes to the TVCF, we determined that there is substantial evidence that providers are not fully embracing the good practices suggested. We still believe there is a pressing need to review more fully how far providers have progressed in implementing the guidance contained in the TVCF. We would welcome the opportunity to partake in such a review and share the evidence we have gathered to help ensure that vulnerable customers are really being treated fairly.

Ofcom Question 1: Do you agree with the proposed revisions to our guide? Please provide your views with supporting evidence.

Yes, from our experience the guide should be amended in the ways proposed.

We firmly believe that if providers routinely include clear and prominent information about sources of free debt advice in their payment and collection related communications to customers in arrears or struggling to pay, it will greatly help customers seek help at the earliest opportunity. This combined with a direct way for consumer organisations to contact providers

on a customer's behalf will assist in addressing not only arrears issues, but also to help resolve other account issues before they become an arrears issue or a problem debt.

We still believe that providers could do more to identify and record vulnerable customers and their needs. We fully support the proposed changes for providers to use the customer's preferred communication channel – not only for arrears matters, but more generally for all account matters for vulnerable customers. We have recorded numerous instances demonstrating that providers do not understand their legal requirements under the Equality Act 2010 to make Reasonable Adjustments.