



# Vulnerable Customer Policy

POL128

Class 1 – General B2B Use / Public



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## 1 Introduction

This Vulnerable Customer Policy applies to Nasstar Group Ltd (including Modality and Nasstar) and its operating divisions in the UK and overseas, hereafter referred to as 'Nasstar' or the 'Group'

This policy applies to:

- Customers
- Prospective Customers
- Former Customers

This policy has been established and embedded into the organisation to ensure that a fair, transparent and consistent approach is adopted universally to support any customer that is deemed vulnerable.

## 2 Our Commitment

Nasstar are committed to protecting the interests of all its customers and ensuring their fair and appropriate treatment. We take our additional responsibility towards vulnerable customers extremely seriously and are happy to explore suitable adaptations and modifications to suit their individual needs.

As vulnerability does not impact everyone in the same way, we strongly believe each vulnerable customer's needs must be assessed on an individual basis.

Nasstar embrace the following principles when determining the appropriate support measures:

- Customers should be supported in making informed decisions about Nasstar's products and services. No pressure must ever be placed on a customer to gain a sale.
- Nasstar will never assume that a customer's vulnerability means they do not have the mental capacity to make decisions.
- We will not discriminate against anybody because of their vulnerability.
- Nasstar and its employees will always treat customers with respect, be understanding and empathetic to their situation, providing practical support.
- Nasstar may sometimes need to take steps to safeguard customers where their welfare is a concern, in immediate or imminent danger.

## 3 What is a Vulnerable Person?

For the purpose of this policy, vulnerable customers are customers who, as a result of their personal circumstances could potentially be susceptible to harm or detriment. This includes any circumstances which may impact their ability to make an informed decision, access services or to take appropriate actions.

Nasstar doesn't judge a person's capacity simply based on age, an aspect of behaviours or circumstance, but recognises that the following circumstances can make a customer more vulnerable:

- Age
- Physical disability
- Learning disability
- Physical or mental illness
- Low literacy levels
- Communication difficulties
- Significant change in personal circumstance, such as a bereavement.

Nasstar's vulnerable persons policy also considers specific needs of individuals with additional accessibility requirements. Whilst not all people with a disability are vulnerable, we recognise that we may need to make reasonable adjustments to enable the effective interaction between Nasstar and our customers.

## 4 How Can Nasstar Help?

Nasstar provides several options to support its customers that find themselves in a position that makes them vulnerable. These services include:

- Access to free directory enquiries – any customer that experiences difficulties using a printed directory can apply for free 195 Directory Enquiries. This is an externally provided service that requires registration. Further details can be obtained from RNIB at the following link:
  - <https://www.rnib.org.uk/information-everyday-living-benefits-and-concessions-concessions/free-directory-enquiries-195>
  - Or call free on 0800 587 0195.
- Priority Fault Repair – for any customer that is medically dependent Broadband connection and/or telephone service due to illness or disability. Registration and Validation is required for this service.
- Communications in an Accessible Format – we can provide communications, including bills, letters & contracts in alternative formats to meet the needs of our customers. These alternative formats include Large Print, Coloured Paper, Braille etc. upon request.
- Third Party Bill Management – Customers who find themselves in a vulnerable position due to their personal circumstances can nominate a Third-Party to manage your account on your behalf, enabling them to discuss your account, make changes and payments. Your nominated Third-Party is not directly liable for any charges of your account, as these must remain the Account Holders responsibility.
- UK Emergency Video Relay Service – this is a third-party service offered to assist BSL relay for access to 999 services. The service is available from the BSL Website, link below, or alternatively via App download . Further details available on the BSL Website, link below:
  - <https://999bsl.co.uk/>
- Text Relay Service – for use by customers that are deaf, hard of hearing or speech impaired. This is a third-party service, full details available from the link below:
  - <https://www.relayuk.bt.com/>

In addition to the above, if your personal circumstances require a different type of support, please contact your account manager, or customer services. Nasstar are happy to discuss your individual needs and look at the available options we have to support you.

## 5 How to Notify Nasstar of your circumstances and requirements for support?

To make us aware if your circumstances or accessibility needs, please contact us using our main contact number (0345 003 0000), email address ([enquiries@nasstar.com](mailto:enquiries@nasstar.com)), or via your normal account management contacts.

Nasstar may need to ask your permission to keep a record of any personal information about your disability or circumstance making you vulnerable but will not disclose this information to any external party. This information will be stored securely within our IT Service Management Tools. The information will only be used to enable Nasstar meet your needs and will not be used for any other purposes.

For more information about how we hold or use your data, please refer to the privacy notice on the Nasstar website at the following link:

- <https://www.nasstar.com/privacy-notice>

## 6 Policy Review

Nasstar reviews this policy periodically to ensure that it effectively supports the needs of our vulnerable customers. The review cycle will include an assessment of any feedback from our customers or other interested parties regarding this policy.



## 7 Document Control

This document is the property of Nasstar Group.

It will not be reproduced wholly or in part without the permission of the author.

Any suggested changes or amendments must be communicated through the author for consideration and inclusion if suitable.

## 8 Document details and change summary

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