

COMPANY POLICY STATEMENT

VULNERABLE CUSTOMER

2025

Introduction

At Vistry, we seek to provide a high-quality individual service that best suits the needs of all of our customers. Meeting all needs means we seek to ensure that customers in vulnerable circumstances are treated not only fairly, but with empathy and sensitivity to their circumstances.

Vulnerable customers are likely to need additional assistance, at some stage, to avoid detriment (financial or psychological) when purchasing a home. It is important for us to consider what reasonable steps might be taken to amend our usual processes, to ensure that the customer is treated fairly and so deliver a positive outcome for the customer.

The purpose of this policy is to ensure that the way in which we conduct our business does not have a negative impact on vulnerable customers and also complies with the requirements of the New Homes Quality Code, who provide the following definition of a vulnerable customer.

“When a customers’ disclosed personal circumstances and/or evident characteristics combine with aspects of the New Home buying process to create situations where they are significantly less able than a typical Customer to protect or represent their interests or is significantly more likely than a typical Customer to suffer detriment, or that detriment is likely to be more substantial. Vulnerability can come in a range of guises, and can be temporary, sporadic or permanent in nature that needs a flexible, tailored response from Developers.”

Vistry is committed to ensuring that all its staff are equipped to support vulnerable customers and that they are able to handle a situation involving a vulnerable customer with the required levels of care, attention and respect. Training is available and provided in support of this.

Employee Guidance

Identifying Vulnerable Consumers

A customer may find it difficult to make an informed decision about their available options for a variety of reasons.

The risk factors that contribute to vulnerability in buying a home include:

- low literacy, numeracy and financial capability skills
- physical disability
- severe or long-term illness
- mental health problems including common mental disorders (CMD)
- low income and/or debt
- caring responsibilities (including operating a power of attorney)
- being ‘older’ for example over 80, although this is not absolute may be associated with cognitive or dexterity impairment, sensory impairments such as hearing or sight, onset of ill-health.
- being young (associated with less experience)
- change in circumstances (e.g. job loss, bereavement, divorce)
- lack of English language skills.

Living with a disability, illness or diagnosis does not in itself make someone vulnerable.

In order to correctly address the needs of a vulnerable customer it is important to be able to identify them. Risk factors that can help to identify a vulnerable consumer include illness, disability, illiteracy, bereavement and other impairments as indicated above. The customer may have indicated a vulnerability in correspondence or one or more of the following indicators may become apparent during a telephone conversation or meeting. Key indicators that often highlight a risk factor include:

- a) Can the customer hear everything you are saying, and do they understand what you are saying? Do they ask you to slow down or to speak louder? Are you sure they have heard and understood all the relevant details? Do they ask you to clarify any details or advise they do not understand terminology being used?
- b) Does the customer stay on topic and hold a conversation that is coherent, or do they appear distracted or confused? Do the customer responses remain relevant and are their questions typical for the discussion you are having?
- c) Does the customer take an unusually long amount of time to answer a question that suggests they are struggling to process the information provided to them?
- d) Does the customer indicate they may have a disability or impairment based on their voice, pronunciation, breathing, hearing or ability to understand the conversation? Are they coherent and fluent in the language being used?

Dealing with Vulnerable Consumers

Just because somebody is vulnerable does not automatically mean that they are unsuitable for the products and services firms supply. As soon as we think we may be engaging with a

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vulnerable customer, we should take care to adhere to the requirements set out in this policy.

However, the service we provide does treat all customers as an individual and by following the guidelines below we will continue to ensure we deliver our high levels of service to all including customers who are vulnerable.

When dealing with all customers staff must remain aware of the following guidelines:

- a) Remain patient and empathetic; do not rush the customer, interrupt or appear impatient. Allow the customer to arrive at their own decisions and process the information sufficiently.
- b) Ensure the customer is able to hear and understand what you are saying, ask the customer to explain their understanding of what you are telling them, or include questions as frequently as possible to ensure they are aware of and understand what is being discussed.
- c) Allow the customer to explain thoroughly; do not assume you already know what their requirements or needs are and do not finish off their sentences which often implies you are rushing them to progress the conversation. Listen carefully to them and remain conscious of any absence of understanding, hints at unawareness, or forgetfulness of topics already discussed.
- d) Clarify that the customer is comfortable with the standard and method of communication and offer to provide details in an alternate format such as via post or email for clarity. Before acting on a vulnerable customer's advice, ask if there is anybody else, they need to speak to about their decisions.

Mental capacity

Mental capacity relates to the ability of the individual to understand and to retain and evaluate relevant information in order to be able to make a decision based on that information. In the event that a member of staff believes that a vulnerable customer is unable to make a decision for themselves regarding their purchase or aftercare, they should attempt to identify a carer or next of kin who is authorised to act on their behalf, in many cases, a parent or spouse will represent the interests of the vulnerable customer.

When a vulnerable customer has been identified and requested for a nominated person to support them, please ensure this contact is added to the customer record and written confirmation is received and stored confirming this request, (in line with GDPR) to ensure all those serving the customer are aware.

As with all of our customers, we seek to deliver individual and personalised service and as such take reasonable steps to accommodate customer requests to support all customer needs.

It is important that we maintain a consistent level of service, and that a vulnerable customer receives adequate care, irrespective of which staff they liaise with.

All staff members who deal directly with customers, regardless of department or position, must familiarise themselves with this policy and ensure they understand it completely.

Where vulnerability affects a person's ability to manage their financial responsibilities, customers can be advised of the free Vulnerability registration service via the link below.

Vulnerability Registration Service

The Vulnerability Registration Service ("VRS") gives vulnerable people a single place to [register their status](#), helping them avoid repeating the same difficult conversations every time they engage with organisations like lenders and creditors. It is a "Not for Profit Company Limited by Guarantee" whose aim is to help vulnerable consumers protect themselves against the financial, social and very personal hardship suffered as a result of debt and financial problems.



Greg Fitzgerald
Chief Executive
January 2025