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Consumer vulnerability - Requirements and guidelines for the design and delivery of inclusive service

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National foreword

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Consumer vulnerability — Requirements and guidelines for the design and delivery of inclusive service

Consommateurs en situation de vulnérabilité — Exigences et lignes directrices pour la conception et la fourniture de services inclusifs

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Foreword

ISO (the International Organization for Standardization) is a worldwide federation of national standards bodies (ISO member bodies). The work of preparing International Standards is normally carried out through ISO technical committees. Each member body interested in a subject for which a technical committee has been established has the right to be represented on that committee. International organizations, governmental and non-governmental, in liaison with ISO, also take part in the work. ISO collaborates closely with the International Electrotechnical Commission (IEC) on all matters of electrotechnical standardization.

The procedures used to develop this document and those intended for its further maintenance are described in the ISO/IEC Directives, Part 1. In particular, the different approval criteria needed for the different types of ISO documents should be noted. This document was drafted in accordance with the editorial rules of the ISO/IEC Directives, Part 2 (see www.iso.org/directives).

Attention is drawn to the possibility that some of the elements of this document may be the subject of patent rights. ISO shall not be held responsible for identifying any or all such patent rights. Details of any patent rights identified during the development of the document will be in the Introduction and/or on the ISO list of patent declarations received (see www.iso.org/patents).

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For an explanation of the voluntary nature of standards, the meaning of ISO specific terms and expressions related to conformity assessment, as well as information about ISO's adherence to the World Trade Organization (WTO) principles in the Technical Barriers to Trade (TBT), see www.iso.org/iso/foreword.html.

This document was prepared by Project Committee ISO/PC 311, *Vulnerable consumers*.

Any feedback or questions on this document should be directed to the user's national standards body. A complete listing of these bodies can be found at www.iso.org/members.html.

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Introduction

0.1 What is consumer vulnerability?

Vulnerability can affect anyone at any time. All consumers are different, with a wide range of needs, personal characteristics, health, abilities, and skills. These factors, plus the impact of life events and external conditions, such as organizational behaviour, can place consumers in a vulnerable situation, increasing the risk of them experiencing harm when dealing with organizations. Table 1 contains further information about these risk factors.

Consumer vulnerability can be permanent, temporary or sporadic, long or short term. A consumer's needs and abilities can change over time, particularly if the consumer is faced with an unexpected change of circumstance or a particularly urgent or complex situation.

0.2 Impact of vulnerability on individuals

It is important to recognize that an organization's systems, policies and processes can reduce or exacerbate consumer vulnerability and the risk of harm occurring. The presence of one or more vulnerability risk factors does not automatically mean that an individual is vulnerable. However, the presence of one or more of these factors, combined with organizational poor practice, can contribute to consumer vulnerability and lead to harm.

Consumers in vulnerable situations can find it difficult to:

— obtain, assimilate or retain information;

— access or choose suitable services;

— switch providers or tariffs;

— make decisions in their best interests;

— understand their rights;

— pursue complaints and obtain redress;

— pay for services.

Therefore, consumers in vulnerable situations are at a greater risk of experiencing negative outcomes when interacting with organizations. For example, financial loss, being unable to access services, receiving services unsuitable for needs, stress, inconvenience, exploitation or other harm.

Organizations that understand consumer vulnerability, and provide an inclusive and flexible approach, are better able to meet a diverse range of consumer needs, making it easier for consumers to access services and information, make good decisions and achieve positive outcomes.

0.3 Organizational benefits of adopting an inclusive service approach

This document specifies requirements and gives guidance for organizations on how to provide an inclusive service at all stages of service delivery, helping them to identify and support consumers in vulnerable situations. It is recognized that organizations will need to develop a tailored approach to the development and implementation of an inclusive service (see Annex A), dependent on the nature of their business and level of existing provision.

Adopting an inclusive service approach offers many potential benefits for organizations:

— increased customer base, by making services accessible to a greater number of individuals;

— improved service provision for all customers irrespective of their vulnerability status;

— improvement in the quality of consumer interactions, thereby minimizing the risk of harm;

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— reduced likelihood of problems and complaints, as a result of operating effectively and getting things right first time, leading to a reduced cost of complaints handling;

— improved customer satisfaction, building consumer trust and enhancing the organization's reputation;

— ability to demonstrate ethical behaviour and social responsibility;

— strengthened staff loyalty and engagement by ensuring that they feel valued, supported and confident in handling difficult situations;

— help to achieve compliance with legal obligations related to fairness and equality, by following good practice in the fair treatment of consumers in vulnerable situations.

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Consumer vulnerability — Requirements and guidelines for the design and delivery of inclusive service

1 Scope

This document specifies requirements and guidelines for organizations on how to design and deliver fair, flexible and inclusive services that will increase positive outcomes for consumers in vulnerable situations and minimize the risk of consumer harm. It covers organizational culture and strategy, inclusive design and how to identify and respond to consumer vulnerability.

It is applicable to any organization that provides services, including service-related products, to consumers, regardless of location or size.

NOTE 1 The term "services" refers to any service provided to consumers online or offline. Service sectors can include, for example, healthcare, leisure and entertainment, retail, energy, communication, financial services, travel and tourism, digital services, professions and trades.

NOTE 2 Service providers can include private or public organizations, charities, government agencies, local authorities of any size.

NOTE 3 It can be fair and reasonable, in some cases, for an inclusive service provider to limit access for individuals outside of the organization's target audience, where the main objective is to protect consumers and prevent harm. For example, preventing children from accessing online gambling sites.

2 Normative references

There are no normative references in this document.

3 Terms and definitions

For the purposes of this document, the following terms and definitions apply.

ISO and IEC maintain terminological databases for use in standardization at the following addresses:

— ISO Online browsing platform: available at https://www.iso.org/obp

— IEC Electropedia: available at https://www.electropedia.org/

3.1
accessible
product, service, environment or facility that is usable by the greatest number of people with a diverse range of capabilities

3.2
artificial intelligence
engineered system with capability to acquire, process and apply knowledge and skills

[SOURCE: ISO/IEC TR 24028:2020, 3.4[15] — modified, deleted Note 1 to entry and changed "capability of an engineered system" to "engineered system with capability".]

3.3
consumer
individual member of the general public who is the end user of services or service-related products

Note 1 to entry: For the purposes of this document, use of the term "consumer" includes a range of potential and existing service users, e.g.

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— those thinking about using or purchasing a service;

— those who have purchased a one-off service;

— those in a short- or long-term service contract;

— end users of a service paying directly for the service;

— end users of a service not paying for the service.

Note 2 to entry: The end user might not be the customer who purchased the service (e.g. persons having a meal at a restaurant that is paid for either by one person in this group or by a different person).

[SOURCE: ISO/IEC Guide 76:2020, 3.5[16] — modified, deleted "(e.g. a smart speaker)".]

3.4
consumer harm
consumer detriment
instance of a *consumer* (3.3) suffering or experiencing negative outcomes, as a result of their dealings with an organization

Note 1 to entry: Harm is often caused by organizations unintentionally.

Note 2 to entry: Harm can be caused by an organization treating a consumer unfairly, providing poor service, giving unsuitable advice, using inaccessible or inflexible systems and/or making it difficult to access complaints handling systems.

Note 3 to entry: Harm includes, for example, financial loss, physical harm, loss of dignity, inconvenience, stress, being denied a service available to others and/or paying for a service that is unsuitable or does not meet individual needs.

3.5
consumer vulnerability
state in which an individual can be placed at risk of harm during their interaction with a service provider due to the presence of personal, situational and market environment factors

[SOURCE: ISO/IEC Guide 76:2020, 3.14[16] — modified, changed "his/her" for "their", changed "detriment" to "harm".]

3.6
essential service
service that is vital to consumer health and wellbeing, where the risk of harm is particularly high if *consumers* (3.3) are unable to access it

Note 1 to entry: Essential services can vary depending on geographical area, current circumstances and the needs of the community. For example, during the COVID-19 pandemic, access to online grocery deliveries became an essential service for many people who were confined to their homes.

Note 2 to entry: Essential services can include, for example, energy, water, healthcare and communications.

3.7
frontline staff
staff responsible for interacting with *consumers* (3.3) in person or remotely via telephone, email, internet or any other form of interaction in the nature of conversation or discussion

Note 1 to entry: Frontline staff can include, for example, customer service advisors, sales advisors, tradespeople.

Note 2 to entry: Frontline staff can be permanent or temporary employees or contracted third parties.

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3.8
inclusive service
design of a service, service-related product or service environment that enables access and use by as many individuals as possible, regardless of their personal circumstances

Note 1 to entry: It can be fair and reasonable, in some cases, for an inclusive service provider to limit access for individuals outside of the organization's target audience, where the main objective is to protect consumers and prevent harm. For example, preventing children from accessing online gambling sites.

3.9
risk factor
characteristic or circumstance which can contribute to, or cause, *consumer vulnerability* (3.5)

3.10
service-related product
intangible product, linked to service provision, delivered by a service organization

Note 1 to entry: Examples of service-related products include mortgages and insurance policies, energy tariffs, telephone, mobile or internet plans.

3.11
touchpoint
place at which *consumers* (3.3) contact or interact with an organization to exchange information, access services or make transactions

Note 1 to entry: Touchpoints can include, for example, service environments such as branches, shops, hotels, or methods of communication such as telephone, email, websites or apps.

3.12
vulnerable situation
temporary, sporadic or permanent circumstance which places a *consumer* (3.3) at risk of harm or disadvantage, if an organization does not act with appropriate levels of care

4 Organizational commitment, principles and strategy

4.1 Commitment

The organization shall demonstrate a clear commitment to improving outcomes for consumers in vulnerable situations and minimizing the risk of consumer harm by following the principles detailed in 4.2. This commitment shall be led by top management and embedded across the organization through ongoing engagement and communication with staff.

4.2 Principles

The organization's top management shall demonstrate a clear commitment to the following principles at all stages of service design and delivery.

a) **Accountability** – Embed a culture of accountability by taking responsibility for organizational actions and resulting consumer outcomes.

b) **Empathy** – Treat consumers in vulnerable situations with kindness and without judgement or assumption.

c) **Empowerment** – Provide consumers with the tools they need to make informed decisions about services. Provide staff with the tools they need to support consumers in decision making and to facilitate quick and effective resolution of problems.

d) **Fairness** – Treat all consumers fairly, and do not discriminate against or seek to mislead or exploit any particular group(s) of consumers.

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e) **Flexibility** – Adopt a flexible approach to service provision, which can be adapted to suit the specific needs and abilities of an individual in a vulnerable situation.

f) **Inclusivity** – Design and deliver services so that they are accessible to, and usable by, a diverse range of individuals, including those who are vulnerable.

g) **Innovation** – Be creative in using new technology and processes to identify and support consumers in vulnerable situations. Recognize and adapt to emerging marketplace issues and new concepts in consumer protection, while ensuring that use of new technology and processes does not risk unintended exclusion of some consumers.

h) **Privacy** – Treat personal information respectfully and confidentially.

i) **Transparency** – Be clear and open about the intent to provide an inclusive service, the nature of support available for consumers in vulnerable situations, details of policies, terms and conditions and potential risks.

The organization's top management shall ensure that these principles are clearly communicated to staff at all levels within the organization to ensure that consumers in vulnerable situations are identified and supported.

4.3 Strategy

4.3.1 Outcomes focused

The organization shall be outcomes-focused with the aim of achieving positive outcomes for consumers in vulnerable situations.

NOTE For example, positive outcomes for consumers in vulnerable situations would be receiving fair and flexible treatment, being supported through difficulties, benefitting from risks being minimized and harm being prevented.

The organization shall ensure that:

a) consumers in vulnerable situations can be confident that they will receive fair treatment from the organization and experience outcomes as good as those for other consumers;

b) services are designed inclusively to meet the requirements of consumers with a wide range of needs and abilities and do not create or increase the risk of harm;

c) consumers are able to obtain, understand and make informed decisions based upon information and support provided by the organization;

d) where consumers receive information, advice or support, this is suitable for their needs and takes account of their personal circumstances related to vulnerability;

e) consumers do not face unreasonable barriers to accessing services, communicating with the organization, switching products or price plans, submitting complaints and obtaining satisfactory redress;

f) services do not unfairly disadvantage or penalize those in vulnerable situations, making their life more difficult (e.g. through higher prices, financial penalties or inability to switch products or plans).

4.3.2 Responsibility

The organization shall designate (a) specific member(s) of staff with overall responsibility for:

— advocacy and coordination of consumer vulnerability strategy across the organization;

— implementation of policies, processes and procedures related to inclusive service;

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