



# LEEDS UNITED FOOTBALL CLUB

**THE LEEDS UNITED**

## **Vulnerable Customer Policy**

**Safeguarding Children, Young People and Adults at Risk**

## Table of Contents

<b>Document Control</b> .....	3
<b>1.0 Introduction</b> .....	4
<b>2.0 FCA Guidance</b> .....	5
<b>3.0 Understanding the needs of the customer</b> .....	5
<b>4.0 Skills and Capability</b> .....	6
<b>5.0 Product &amp; Service Design</b> .....	6
<b>6.0 Customer Service</b> .....	7
<b>7.0 Communications</b> .....	7
<b>8.0 Monitoring and Evaluation</b> .....	8
<b>9.0 Examples of Customer Harm</b> .....	8
<b>Appendix A Signs and phrases to actively look out for when engaging with customers</b> .....	9

## Document Control

### Revision history

Version	Status	Revision date	Author	Summary of changes
0.1	draft	14/02/24	H. Evans	New document
1.0	final	27/02/24	H. Evans	Input from v12

### Review and approvals

This document requires the following approvals:

Name	Signature	Title	Date of issue
K. Holmes		Head of Ticketing & Matchday	28/02/24

### Distribution

This document has been distributed to:

Name	Title	Date of issue	Version

## 1.0 Introduction

The FCA (Financial Conduct Authority) defines a vulnerable customer as:

***...someone who, due to their personal circumstances, is especially susceptible to harm, particularly when a firm is not acting with appropriate levels of care.***

Leeds United Football Club (the Club) adheres to the belief that everyone has the right to grow up and live their life free from abuse, neglect or exploitation, and all staff and volunteers have a part to play in making this a reality.

We have both a moral and a legal obligation to protect children, young people and adults at risk across all of our activities. Safeguarding is ultimately the responsibility of all of us and depends on the everyday vigilance of staff, even if they do not work directly with members of the public.

Ultimately, the Club wants vulnerable customers to experience outcomes as good as those for other customers.

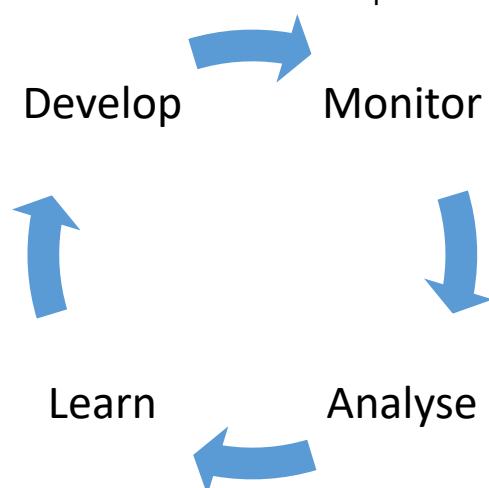
The purpose of the vulnerable customer policy is to communicate the minimum requirements for our colleagues, business areas and relevant third parties to identify and treat our vulnerable customers appropriately. The Club should be able to identify vulnerabilities and tailor support for these.

The requirements specified in this policy have been devised to help us manage risk and mitigate potential customer harm, be it inconvenience, loss or unfair outcome as a result of the Club not providing reasonable adjustment.. This is in line with our regulatory obligation to treat customers fairly and our legal obligation to make reasonable adjustments where possible.

The policy has been designed in partnership with our Supporter Advisory Board and Disability Advisory Group and is a guide to our staff, partners and contractors when working with vulnerable people.

In addition to this policy, the Club has a duty to comply with other legal obligations covered in the Equality Act 2010 and Mental Capacity Act 2005.

The FCA recommends the model of continuous improvement:



Therefore the policy will be reviewed annually and brought to the Strategic Safeguarding & EDI Board for approvals.

## 2.0 FCA Guidance

The FCA Guidance is issued under section 139A of the Financial Services and Markets Act 2000 as guidance on our Principles for Businesses (the Principles). It sets out their view of what firms should do to comply with their obligations under the Principles and ensure they treat vulnerable customers fairly.

It explains that to achieve good outcomes for vulnerable customers, firms should:

- Understand the needs of their target market / customer base
- Ensure their staff have the right skills and capability to recognise and respond to the needs of vulnerable customers
- Respond to customer needs throughout product design, flexible customer service provision and communications
- Monitor and assess whether they are meeting and responding to the needs of customers with characteristics of vulnerability, and make improvements where this is not happening

## 3.0 Understanding the needs of the customer

<b>FCA recommended actions</b>
<ul style="list-style-type: none"><li>• Understand the nature and scale of characteristics of vulnerability that exist in their target market and customer base.</li><li>• Understand the impact of vulnerability on the needs of consumers in their target market and customer base, by asking themselves what types of harm or disadvantage their customers may be vulnerable to, and how this might affect the consumer experience and outcomes</li></ul>
<b>Club Actions</b>
<ul style="list-style-type: none"><li>• Annual disabled supporter survey</li><li>• Recognise that one size does not fit all</li><li>• Allow additional time if required</li><li>• Recognise that we may need to use different contact methods – email / phone / face to face / interpreters</li><li>• Annual supporter survey</li><li>• Consultation with disability advisory group and supporter advisory board</li><li>• Meet with external experts when required</li><li>• Keep a record of a person's specific needs so they do not have to explain it more than once</li></ul>

## 4.0 Skills and Capability

### FCA recommended actions

- Embed the fair treatment of vulnerable consumers across the workforce. All relevant staff should understand how their role affects the fair treatment of vulnerable consumers.
- Ensure frontline staff have the necessary skills and capability to recognise and respond to a range of characteristics of vulnerability.
- Offer practical and emotional support to frontline staff dealing with vulnerable consumers.

### Club Actions

- Annual Staff training (or as required) in EDI and vulnerabilities – this includes
  - Appropriate language
  - Disability awareness
  - Feedback from the disability advisory group
- Report any concerns on MyConcern and log lessons learned for future staff training
- The Club has:
  - A Disability Liaison Officer who works specifically to enable disabled fans to access the matches
  - A Disability Access Officer who looks at the fabric of the building and manages the actions from the Access audit
  - A Head of Safeguarding & EDI who oversees policy and practice as well as managing any concerns
  - A Supporter Liaison Officer who works with different supporters regarding their journey with the Club. The SLO also attends away matches to provide support and information where needed.
  - Hospitality staff members looking after customers in the hospitality areas on a matchday
  - Wellbeing staff available on a matchday to support fans with additional needs.
- The Club has an Employee Assistance programme to support staff emotionally
- The Club has a staff appraisal system that allows staff to gain specific support for their roles
- The Club has a network of Mental Health First Aiders across the departments

## 5.0 Product & Service Design

### FCA recommended actions

- Consider the potential positive and negative impacts of a product or service on vulnerable consumers. Design products and services to avoid potential harmful impacts.
- Take vulnerable consumers into account at all stages of the product and service design process, including idea generation, development, testing, launch and review, to ensure products and services meet their needs.

### Club Actions

- The Club is implementing Equality Reviews for all new products and programmes to take into consideration positive and negative impacts of change to our services.
- Where appropriate, the Club will look for feedback from end users when developing new services

## 6.0 Customer Service

### FCA recommended actions

- Set up systems and processes in a way that will support and enable vulnerable consumers to disclose their needs. Firms should be able to spot signs of vulnerability.
- Deliver appropriate customer service that responds flexibly to the needs of vulnerable consumers.
- Make consumers aware of support available to them, including relevant options for third party representation and specialist support services.
- Put in place systems and processes that support the delivery of good customer service, including systems to note and retrieve information about a customer's needs.

### Club Actions

- Enable staff to spot and respond to vulnerabilities through training and mentoring
- Staff can signpost to the DLO if they need additional support
- DLO keeps a record of particular requirements with membership details so staff are aware of preferred contact details
- Access guide on website goes through contact options and personal assistant guidance

## 7.0 Communications

### FCA recommended actions

- Ensure all communications and information about products and services are understandable for consumers in their target market and customer base.
- Consider how they communicate with vulnerable consumers, taking into consideration their needs. Where possible they should offer multiple channels so vulnerable consumers have a choice.

### Club Actions

- The Club is working on an Inclusive Communications Policy. This will be looking at:
  - Font size
  - Use of Plain English
  - Forms of communication used
  - Language used

## 8.0 Monitoring and Evaluation

The Club:

- Conducts an annual disabled ticket holder survey that asks about barriers to services and how people would like to communicate the Club. The results are transferred to membership records by the DLO.
- Sits on a Disability Advisory Group and Supporter Advisory Board to discuss issues and elicit feedback.
- Updates this policy annually with any findings and learning from real life situations

## 9.0 Examples of Customer Harm

The FCA provides a number of examples that could be described as ‘customer harm’:

<b>Health</b>	<b>Life Events</b>	<b>Resilience</b>	<b>Capability</b>
Physical Disability	Retirement	Inadequate (outgoings exceed income) or erratic income	Low knowledge or confidence in managing finances
Severe or long-term illness	Bereavement	Over- indebtedness	Poor literacy or numeracy skills
Hearing or visual impairment	Income shock	Low savings	Poor English language skills
Mental health condition or disability	Relationship breakdown	Low emotional resilience	Poor or non-existent digital skills
Addiction	Domestic abuse (including economic control)		Learning difficulties
Low mental capacity or cognitive disability Caring responsibilities	Caring responsibilities		No or low access to help or support
	Other circumstances that affect people’s experience of financial services e.g. leaving care, migration or seeking asylum, human trafficking or modern slavery, convictions		

All consumers are at risk of becoming vulnerable, particularly if they display one or more characteristics of vulnerability. They may become more or less vulnerable, and so have an increased or reduced risk of harm throughout their lives. A heightened period of vulnerability can be short, such as a hospital stay, or long term, such as long-term unemployment affecting financial resilience.



## Appendix A Signs and phrases to actively look out for when engaging with customers

(mainly from FCA Occasional Paper 8 practitioners pack)

Changes in payment behaviour such as:

- payments stopping suddenly
- late or missed payments
- regular unarranged overdrafts and charges
- unusual activity on an account

Phrases such as:

- I can't pay
- I'm having trouble paying
- mention of breathing space/debt moratorium or contacting a debt advisor
- I can't read my bill
- I can't understand the letter you sent me
- I can't hold on all day
- I hate these press buttons

Staff could also be on the lookout for:

- shortness of breath or signs of agitation
- asking for repetition (a sign that the customer is not retaining information)
- signs that the consumer has not understood or signs of confusion
- mention of medication