

VULNERABLE CONSUMER PROCEDURE

The aim of this policy is to outline the practice and procedures for all McKernan Homes customer-facing staff (including employees, contractors or staff employed by third parties, such as estate agents) to ensure any Vulnerable Consumers are identified and given the extra support and guidance they require to make an informed decision about buying a New Home.

The policy covers all staff and areas of work which involve direct contact with a customer.

Background

Buying a New Home is likely to be one of the most expensive purchases that anyone makes and although buying a New Home can be exciting, the process can also be very stressful.

We want to support Buyers of our New Homes throughout the purchase process and we are committed to providing high levels of customer service at all times.

As part of this goal, it is important to acknowledge that certain Vulnerable Consumers may need additional support during the New Home purchase process and we aim to achieve this by ensuring customer facing staff are well trained, knowledgeable, friendly and helpful.

Our staff must have sufficient knowledge of the New Homes for sale, the purchase process and also the requirements of the Consumer Code for New Homes. They must keep Buyers informed throughout the process, and ensure that there is a suitable handover process and that high levels of customer service are demonstrated in the After Sales Service we provide.

All customer-facing staff must be able to identify any Buyers of New Homes who could be considered to be vulnerable, and ensure they receive the extra support and guidance they might need.

Definition of "Vulnerable"

The Consumer Code for New Homes defines Vulnerable Consumers as:

"Someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when a firm is not acting with appropriate levels of care. Vulnerability may come in many forms and may be temporary, sporadic, or permanent. It may need a flexible, tailored response from Developers."

Identification of Customers in Vulnerable Circumstances and Offering Support

Some vulnerability may be immediately apparent, such as age, language barrier or a physical disability. Other vulnerability may become apparent during the sales process, such as divorce or bereavement.

However some vulnerability may be much harder to identify. All customer-facing staff must ensure that all customers are provided with high levels of customer service and look out for signs of vulnerability so that vulnerable customers can be given the extra support, guidance and time they need to make an informed decision.

Examples of extra support include:

- Spending longer explaining terms and conditions of sale, the sales process or fees and costs.
- Asking if a customer would like to discuss the matter with a relative or friend before making a decision, or bring someone with them when signing paperwork at a later date.
- Offering to text or email a customer who is hard of hearing rather than calling them as the preferred method of contact. Offering more face-to-face meetings to go through the details, rather than over the telephone.

Responsibilities of our Company

1. To ensure staff are aware of this policy and are adequately trained.
2. To support individuals in relation to identified risk and vulnerability.
3. To provide means of reporting any instance where we believe that a client might be in vulnerable circumstance.
4. To provide means of reporting any instance where we believe that staff are not acting in line with this policy and the requirements of the Consumer Code for New Homes.

Responsibilities of our Customer-Facing Staff

1. To be familiar with this policy and procedures and the sections of the Code that relate to Vulnerable Consumers.
2. To undertake all the mandatory training provided by us and the Code and to identify any further training needs.
3. To take appropriate action in line with these policies and as required by the Code.
4. To report any instance where you believe that a Buyer might be vulnerable (and you think they need additional support above and beyond what you can offer) to your Line Manager immediately and ask for support in managing the situation.
5. To report any instance where you believe that a colleague is not acting in line with this policy or the requirements of the Code.

Vulnerable Consumers Compliance Procedure

1. Peter McKernan is the person responsible for our Vulnerable Consumers Policy and Procedure.
2. Prior to the sales process commencing, all customer-facing staff are to be trained on the Consumer Code for New Homes requirements. All sales staff must undertake further training on how to identify and support Vulnerable Consumers.
3. Refresher training on how to identify Vulnerable Consumers must be taken annually by all customer-facing staff.
4. Training records must be maintained for all customer-facing staff.
5. The person with overall responsibility for selling New Homes in our company, must ensure that customer-facing staff are complying with the specific requirements of the Code relating to Vulnerable Consumers and can; demonstrate adequate competence in providing additional support and guidance to Vulnerable Consumers; advise all customers on the content and application of the Code; and offer high levels of customer service at all times.
6. Any issues or further training needs identified in relation to knowledge and application of Code requirements for Vulnerable Consumers by sales staff must be notified to your Line Manager.
7. A written record of any issues or training needs, and the corrective action taken must be recorded in the staff training files.

Further support & guidance

If you need additional support for dealing with Vulnerable Consumers, please contact Peter McKernan who is the person responsible for our Vulnerable Consumers Policy and Procedure.

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