

# Standardisation of vulnerability definitions

# 1. Introduction

## **Problem statement**

- 1.1 To ensure the needs of vulnerable consumers are met it is important that communications providers are able to identify those with vulnerabilities and their needs.
- 1.2 Currently the definition of vulnerability is extremely wide, and there are not standardised sub-sections of vulnerability. This means that providers may interpret the definition of vulnerable differently, leading to differing outcomes between providers.
- 1.3 Additionally, whilst there is intersectionality between different groups of vulnerable consumers, the needs of those with different types of vulnerability is likely to differ significantly. Consumers may benefit from communications providers having a greater understanding of what their needs may be.
- 1.4 Furthermore, the breadth of the definition makes it hard to apply regulations to specific groups of vulnerable consumers, meaning that regulations are applied with a broad brush across everyone falling within the definition.

## **Improved approach**

- 1.5 We believe that were there to be standardised definitions of sub-categories within the vulnerable consumer definition this would enable more targeted regulation and approaches from communications providers, leading to better outcomes for relevant consumers.
- 1.6 For example, vulnerability could be split into those who are:
  - (a) Medically vulnerable
  - (b) Financially vulnerable
  - (c) In receipt of a social tariff/social tariff eligible
  - (d) Technologically vulnerable
  - (e) Geographically vulnerable
- 1.7 Customers could fall into multiple categories of vulnerability, and this should be captured.
- 1.8 Categorising vulnerabilities like this would enable CPs to have potentially differing approaches to different groups, allowing for a more nuanced approach and better outcomes.
- 1.9 We will discuss the different categories in more detail below.

## 2. Categorising Vulnerabilities in a standardised manner

2.1 The categories of vulnerability captured in paragraph 1.6 could be captured in a form similar to the below non-exhaustive list:

(a) Medically Vulnerable

- (i) Individuals with chronic or life-threatening illnesses
- (ii) Individuals with physical disabilities
- (iii) Individuals with cognitive or learning disabilities
- (iv) Individuals with mental health issues

(b) Financially Vulnerable

- (i) Low-income households
- (ii) Unemployed individuals
- (iii) Single-parent families
- (iv) People at risk of homelessness
- (v) Recipients of government benefits
- (vi) Those struggling to pay their bills or going through the collections process

(c) Social Tariff Eligible

- (i) Those who are eligible for social tariffs

(d) Technologically Vulnerable

- (i) Individuals with limited digital literacy or access to technology
- (ii) Individuals reliant on assistive technology

(e) Geographically Vulnerable

- (i) People living in rural or remote areas with limited access to services
- (ii) Individuals residing in areas prone to natural disasters or extreme weather conditions
- (iii) Those in areas at higher risk of power cuts

2.2 It is important to recognize that the categories of vulnerability previously outlined are not mutually exclusive. Vulnerable customers may experience multiple dimensions of vulnerability, which can intersect and compound the challenges they face. Telecommunications providers must be cognisant of the intersectionality to tailor their services and support effectively.

## 3. The benefits of standardisation

3.1 Having standardised definitions and groups of vulnerability will allow for:

- (a) **Consistency and Clarity:** A standardised categorisation of vulnerability allows for consistent identification and support across different telecommunications providers. This ensures that all vulnerable customers receive the necessary assistance in a consistent manner, regardless of the service provider they choose.
- (b) **Enhanced Support:** With a clear understanding of the various dimensions of vulnerability, telecommunications providers can tailor their services and support to meet the specific needs of different customer groups. This should lead to improved consumer outcomes.
- (c) **Informed Decision-Making:** A standardised approach to vulnerability helps providers make data-driven decisions when allocating resources, designing products, and formulating policies. This, in turn, enables them to better address the needs of vulnerable customers and make more effective use of their resources.
- (d) **Regulatory Compliance:** Standardising vulnerability categorisation helps providers meet the requirements set by regulatory bodies and industry watchdogs.
- (e) **Enhanced Collaboration:** A shared understanding of vulnerability across the industry facilitates collaboration among stakeholders, including government agencies, non-profit organisations, and advocacy groups. This can lead to the development of more comprehensive and coordinated strategies to address the needs of vulnerable customers.
- (f) **Social Responsibility:** Embracing a standardised approach to vulnerability demonstrates the market's commitment to social responsibility, fostering a positive brand image and enhancing customer trust.
- (g) **Reducing Inequalities:** By addressing the needs of vulnerable customers, telecommunications providers contribute to the reduction of inequalities in society and help ensure that all individuals have the opportunity to participate fully in the digital world.