

BSI Launch of BS ISO 22458 Consumer Vulnerability

May 5 2022

‘Helping organizations to deliver fair, flexible and inclusive services’

Summary Report



INTRODUCTION

Vulnerability is not a label. It's a complex, dynamic state that can affect anyone, anywhere, at any time, and can be temporary, permanent or sporadic. Our understanding of vulnerability has evolved over time and traditional assumptions about what makes someone 'vulnerable' are no longer fit for purpose. While disabled people, for example, can often be automatically labelled as vulnerable, in practice this depends on the situation. For example, a person in a wheelchair taking out a phone contract online is no more likely to be vulnerable than an able-bodied person carrying out the same task. Meanwhile, the Covid-19 epidemic has demonstrated how challenging external influences can have a detrimental impact on the well-being of individuals you might not think of as 'vulnerable'.

As David Bell, BSI's Director of Standards Policy, put it in his opening statement as he welcomed stakeholders to the launch: 'I don't think I've been to a launch of a standard that is more timely, more relevant, more necessary than the one we're going to talk about today.'

Following the publication of BS ISO 22458 – Consumer Vulnerability, BSI brought together UK stakeholders, including from consumer groups, government, academia, business and regulators, to launch the content of the new standard and explain how organizations and consumers alike can benefit from adoption of this new international standard.

SETTING THE SCENE: Consumer vulnerability standards 2010 to 2022

- Michael Hill, ISO/PC 311 Chair
- Sadie Dainton, Senior Consumer Policy Manager, British Standards Institution (BSI) and ISO/COPOLCO Chair

Key points

- Michael noted that he was involved in the original British Standard back in 2010, and how wonderful it's been to have the opportunity to bring it up to date. In 2010, the Equality Act had just been introduced in the UK, and many organizations were focused on more static aspects of vulnerability such as age, gender, sexuality, faith, and disability. BS 18477 (the predecessor to BS ISO 22458) broadened that definition and provided a valuable tool kit for organizations, particularly those providing essential services, helping them to identify, support and protect those who were most vulnerable in society.
- Since 2010 there has been a greater broadening of understanding, particularly within regulated markets such as energy and personal finance, of vulnerability and its more situational aspects. A bereavement, mental illness or sudden change in income, for example, can make someone temporarily vulnerable, impacting the way they interact with an organization and risking harm if that organization does not behave appropriately.
- Just before the coronavirus pandemic, the Competition and Markets Authority (CMA) published a paper that highlighted the importance of understanding the situational aspects of consumer vulnerability, and encouraged regulators and government to take further steps. The result was a number of regulators developing sector-specific policies and guidance around consumer vulnerability.
- In 2018, when BS 18477 came up for review, it became clear that BS 18477 needed to be updated to reflect evolving definitions of consumer vulnerability and global best practice. Regulators around the world have also been putting measures in place to protect vulnerable consumers – such as those experiencing financial hardship in Australia.

- With the support of ISO/COPOLCO and participation from standards bodies from around the globe, the original British Standard was used as the base document for a new international standard. Bringing in different cultures and different experiences has internationalised and strengthened the approach to the standard.
- Within the UK there has been a truly multi-stakeholder approach to the development of BS ISO 22458, including businesses, regulators, government and consumer groups, which has ensured the final standard meets the needs of all stakeholders.
- By video, we heard from two international stakeholders involved in development of the standard, who highlighted its value in their countries.
 - Jeanne Bank, Chair of the Canadian Committee to ISO 22458, noted that recent emergencies and natural disasters in Western Canada have underscored the dynamic aspect of vulnerability recognized in the new standard, and the value of being able to look at vulnerability differently.
 - Malaysia's Saral James highlighted that there has previously been no code or standard in Malaysia that provides guidance on best practices for vulnerability in the service industry. The detailed, comprehensive guidance in ISO 22458 will help organizations in Malaysia, including utility and communication providers, to understand and apply best practice, and to proactively identify and support vulnerable consumers.

INTRODUCTION TO BS ISO 22458: Evolution of best practice, key principles and goals

- Julie Hunter, Chair, Consumer and Public Interest Network (CPIN) and ISO 22458 Project Lead

Key points

- From the beginning, BS ISO 22458 has aimed to help service providers understand and plan for vulnerability, to identify vulnerable consumers and to provide meaningful support. The ultimate goal was to reduce harm and improve outcomes for consumers in vulnerable situations; to make sure that they had a better experience in their interactions with service providers.
- The way that firms behave can help reduce vulnerability – but their actions can also create vulnerability or make it worse. The new international standard can be used by any service provider, of any size, in any sector or country. It provides detailed guidance for organizations to help them deliver inclusive services and minimize the risk of harm occurring. Too often vulnerability is dealt with by a handful of employees in the customer service team. It must not be an 'add-on' or 'afterthought' and must be embedded within the organization's culture and its service design and delivery.
- The standard's guidance covers six key areas: organizational commitment, principles and strategy; identifying consumer vulnerability; inclusive design; responding to consumer vulnerability; resources to support service delivery; and monitoring, evaluation and continual improvement.
- Organizations must listen to people who have lived experience of vulnerability, using research and data to inform their service design. The standard also encourages them to build partnerships with stakeholders who can help them understand the challenges faced by different vulnerable groups.
- There's no such thing as an 'average consumer'; everyone's needs, abilities and circumstances are unique. So, treating customers fairly does not have to mean treating them all the same. It means tailored, flexible support that meets the needs of individuals. If someone is struggling to understand something, can the information be provided in a different format, for example?

- A key section that has been added to the new standard is intended to reflect the changing ways in which consumers interact with firms. Much more interaction now happens online than it did in 2010. Effective use of data is essential to good service provision, and service providers should collect more information about vulnerability to understand the needs of their customers and support good practice. The standard addresses how organizations collect and make smart use of data in a way that is securely managed and respects customers' privacy rights and expectations.
- The standard provides an overarching framework and guiding principles that promote innovation and support businesses to take a tailored and proactive approach to identifying risk and reducing harm, and to think of inclusively-designed solutions that work for them and their customers. If issues are identified, the standard encourages businesses to look at the root of the problem and put in place steps to mitigate such issues arising again in the future.
- Continual improvement is key. Our way of thinking about vulnerability has changed between 2010 and now, and will continue to do so. Organizations must constantly listen to and learn from feedback, adapting their practices in line with this.

Q&A with Julie Hunter

Q *How can organizations become more proactive about their approach rather than making assumptions? For example, there is generally an assumption that if people are engaging online, they have the capability to deal with digital systems.*

A A key part of inclusive service is the need to provide a choice of contact methods for consumers at all points of interaction, for example, new customers, queries, complaints. Some people will choose to engage with an organization digitally, others might prefer face-to-face or a telephone conversation. There is a section within the standard about the use of AI and online systems, that defines good practice for organizations when they are engaging with somebody online, such as avoiding forcing them down a particular route to get information, asking them about any specific needs or providing space for disclosure of relevant information.

Q *This was previously a British Standard. What's the single most important difference between the previous version and the new international Standard?*

A The definition of 'consumer vulnerability' has remained the same from BS 18477 in 2010 to ISO 22458 in 2022: 'the 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.'

However, a key difference is how these risk factors are defined and explained. BS ISO 22458 raises awareness of a much broader range of risk factors that can place consumers in vulnerable circumstances, including situational vulnerability (job loss, bereavement, family break up, abuse) and the influence of external factors (such as the economic situation, natural disasters, pandemics). Having an international working group of experts helped to broaden this understanding. We are now more aware of how these factors can impact consumers in their interactions with service providers. BS ISO 22458 reflects this, providing more detailed guidance about how staff can recognize individuals who are experiencing difficulties, understand their needs, and provide tailored and meaningful support.

Also, crucially, there is a new focus on organizational behaviour and inclusive service. How organizations design their services and treat their customers is fundamental to this. Without realizing it, they can often create or exacerbate vulnerability, which can lead to harm. That's why ISO 22458 is so important – it recognizes how vital the role of business is and provides more practical guidance to

help them implement change, reduce the risk of harm and empower and protect their vulnerable customers.

Q *Is there value in moving from a subjective assessment of vulnerability to having some more objective measures to assess if someone is vulnerable?*

A The standard gives clear guidance on how to recognize signs of vulnerability. Although automated tools can be used, for example to flag unusual activity on a bank account, these need to be interpreted and followed up on with sensitivity and care. It might be that someone is vulnerable, but is reluctant to talk about it. Or, that someone is exhibiting signs of vulnerability, but is not actually vulnerable provided the right measures are in place. Vulnerability is often complex and, in most cases, I believe that it is difficult to replace human empathy and flexibility in understanding needs and finding solutions. It takes skill to start a conversation that reassures the customer, encouraging them to share relevant information so that meaningful support can be provided. It's important to involve consumers in what the right solutions are.

PANEL DISCUSSION: How ISO 22458 can benefit organizations and their customers.

- David Bell (Facilitator)
- Julie Walker, ED2 Consumer Vulnerability Mobilisation Manager, Scottish and Southern Electricity Networks
- Peter McClenaghan, Director of Infrastructure and Sustainability, Consumer Council of NI
- Andy Clowes, Head of Customer Experience and Strategy, South East Water

Summary

Each organization involved in the panel discussion had followed the previous British Standard on consumer vulnerability, and plans to adopt the new ISO Standard. Discussion focused around how the organizations have been embedding principles from the Standard to date, with clear recognition of how doing so has benefited the business as well as consumers.

Key points

- The commercial benefits to a business of following vulnerability standards were clearly recognized by panellists. For example, a more focused and efficient approach has helped SSE Networks save money, which is ultimately reflected in consumer bills. A 'win-win'.
- For Southern Water, having clear guidance in the form of a standard helps to inform business KPIs, and to identify (and close) gaps.
- There was a clear recognition of the importance of training employees in how to recognize and deal with vulnerability, which can lead to higher levels of staff engagement.
- The importance and value of gathering consumer feedback was highlighted, for example by carrying out customer satisfaction surveys among vulnerable customers, including those experiencing payment difficulties. Building understanding of different customer needs can help an organization adapt its services.
- Partnerships with organizations that represent and support consumers can also be highly valuable, to gather insights, to reach the most vulnerable customers, and – where appropriate – to signpost customers to those organizations for support.

- Vulnerability standards can be valuable for regulators as well as business. By following BS 18477, the Consumer Council of NI was able to demonstrate that it practices what it preaches as a consumer organization. This enabled it to work with industry to implement the standard across the utility industry in Northern Ireland.
 - The new ISO Standard will raise the bar around business expectations, in a positive way. Ensuring that staff have the right training and bringing them on board with the vision can be challenging, but the resulting behaviour changes have an incredibly positive impact.
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Panel Q&A

Q *What are the commercial benefits of delivering improvements in how a business handles consumer vulnerability?*

A (Andy Clowes) It's all about efficiencies. Having the standard helps us focus more on seeking consumers' views before make important changes. This means we are more likely to get those changes right first time.

Q *What was the most significant challenge of implementing BS 18477?*

A (Andy Clowes) The first time around we struggled to translate the principles in the standard into what we did in practice. There was a bit of a fear factor among the team at an operational level. But we overcame this challenge, and we were the first organization to apply and meet the requirements of the first standard. Now, my biggest fear is that we might not be the first to do so with BS ISO 22458!

Q *How does the standard work alongside regulation, and are there any conflicts?*

A (Peter McCleneghan) If regulators aren't already operating in line with the good practice outlined in the standard, a key question is why not? I would hope that there wouldn't be any conflicts – and if there are, it's likely that the regulator needs to shift and modernise.

A (Julie Hunter) Although it is an international standard, during its development we did consider regulatory guidance in the UK (such as that from Ofgem and the Financial Conduct Authority) to ensure there is no conflict with sector-specific guidance and obligations. In fact, BS ISO 22458 complements existing guidance and could be used as an overarching framework to promote consistency across sectors.

Q *We have heard how consumer vulnerability is fluid; how do the organizations with vulnerability databases manage this to ensure they don't miss short term vulnerability?*

A (Peter McCleneghan) Good staff training is key and, once this is in place, trusting staff to capture cues, record information and act accordingly so that lessons can be learned. And then it's about how we capture that data, how we pass our data on and how we record that information.

Q *How have frontline staff reacted to the changes they've needed to make? How warm a welcome has there been to the culture change?*

A (Julie Walker) For us, the hardest thing for us was the behavioural change, the culture change. Energy businesses' first priority is to keep the lights on, and back in 2010 customer service probably wasn't as big a focus as it has been in recent years. What made it work for us was the training that we provided frontline staff and getting them engaged, by helping them to understand how to recognize

vulnerability, how to respond to it. It was a tough journey, but now that people have got on board with the need for a shift in behaviour, it's become much easier.

Q (Answered post-event by Piera Johnson, BSI Standards Development Manager) What is BSI planning to endure the widest take up of the new standard, especially by local authorities and social care providers, for example?

A There is an ongoing, comprehensive marketing campaign in which local authorities and social care organizations have been targeted, along with third sector, financial services and utilities organizations.

Q (Answered post-event by Piera Johnson, BSI Standards Development Manager) How does BSI work with smaller businesses to help them implement the standard and achieve accreditation?

A There are planned free webinars from BSI Assurance to support businesses of all sizes in understanding the changes to the standard in addition to the Kitemark elements of the scheme. These are aimed initially at the water, energy and financial sectors. [Visit the following links to register].

- [Inclusive Service Kitemark for Water Provision](#)
- [Inclusive Service Kitemark for Energy Provision](#)
- [Inclusive Service Kitemark for Finance](#)

Details of the Inclusive Kitemark Scheme for businesses that operate in industries outside the regulated industries of energy, water and finance will be released shortly.

BSI Assurance is also planning to release a document outlining the differences between BS 18477 and BS ISO 22458. BSI Assurance, acting as the certifying body, has to avoid a conflict of interest and is not able to offer consultancy. However, if businesses require additional support, we can introduce them to a member of our Associate Consultant Programme.

Closing remarks: Sadie Dainton, Senior Consumer Policy Manager, BSI

Closing the launch event, Sadie reinforced the fact that British Standards, including BS ISO 22458, are developed by a wide range of stakeholders, facilitated by BSI, the UK's National Standards Body, and are instrumental in ensuring that UK voices are heard in the development of European and international standards. BS 18477 was a ground-breaking standard when it was first published in 2010 and is now used by business regulators and consumer organizations throughout the UK to improve outcomes for UK citizens.

It's a great example of delivering standards which protect consumers, but also of the responsible business practice that can be implemented by following the good-practice guidance in BS ISO 22458 towards a fairer, better society.

The key thing going forward is to implement and demonstrate the value and impact of BS ISO 22458 to consumers, businesses and other organizations, such as charities and consumer groups. Application of its best-practice solutions can help to improve outcomes for citizens and society, and drive socially responsible and ethical behaviour more widely.

Sadie concluded by linking the BS ISO 22458 launch event with the subsequent [BSI Consumer Forum Conference](#), in which we would continue to explore how multi-stakeholder standards can help us as we strive to create a truly inclusive society.

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