

# Telecom Vulnerability Policy

August 2025

**This document sets out Utility Warehouse’s policy for meeting the needs of vulnerable customers, and customers with disabilities who take telecommunications services (Landline, Broadband or Mobile) from us.**

## Introduction

At Utility Warehouse, we recognise that all customers are different, with a wide range of needs, abilities and personal circumstances. Our focus is to ensure we provide a fair, flexible, and inclusive service which is appropriate to the needs of the customer, irrespective of their particular situation; making it easier for all customers to obtain information, access a service, or seek an effective resolution if something goes wrong. We understand that vulnerability may be caused by a range of unique factors and that vulnerability is a situation or characteristic and not a trait. Our approach is to identify and record factors that may lead to a customer being in a vulnerable situation and offer a tailored service based on individual requirements. Utility Warehouse uses the following definition: “a customer may be in a vulnerable situation due to circumstances of age, physical or learning disability, physical or mental illness, low literacy, communication difficulties or changes in circumstances such as bereavement”.

## Policy objectives

1. Provide practices for ensuring the fair and appropriate treatment of vulnerable customers.
2. Outline reasonable steps that will be taken to identify vulnerable customers.
3. Describe how information about vulnerable customers’ needs will be recorded.
4. Explain how staff will be made aware of, and trained, to act in accordance with the policies.
5. State how the impact and effectiveness of the policies and procedures will be monitored and evaluated.

# Key Principles

**Our approach is supported by these principles:**

- We act on the broad principle to take appropriate steps to consider the needs of any person who is in a vulnerable situation and therefore needs appropriate adjustments to how we communicate with them; support them; make decisions about their account; record their circumstances.
- We understand that vulnerability is a situation or characteristic and not a trait.
- We recognise that people are different, meaning that some individuals could be vulnerable in circumstances where others might not be.
- We believe that the welfare of any vulnerable person should be considered above all else.
- We recognise that in special circumstances it may be necessary to adopt an individually tailored approach that may mean stepping outside of our normal process.
- We have clear processes and solutions available to vulnerable persons so we can give the best support possible.
- We consider any complaint related to the treatment of a vulnerable person with the utmost seriousness and priority.
- We believe care and transparency are key to building and maintaining trust with vulnerable persons and we will demonstrate this through our actions, behaviour and outcomes

## Identifying vulnerability

Customers can let us know about any personal circumstances or characteristics that may lead them to be in a vulnerable situation:

- Call us 0333 777 0777. You'll find our opening hours at [uw.co.uk/help/contact-us](https://www.uw.co.uk/help/contact-us)
- If you're hearing or speech impaired, you can email [deafmemberservices@uw.co.uk](mailto:deafmemberservices@uw.co.uk) or visit [uw.co.uk/help/contact-us](https://www.uw.co.uk/help/contact-us) to use SignVideo.
- Write to us at Customer Services, Utility Warehouse, Network HQ, 508 Edgware Road, London, NW9 5AB.

Each customer service adviser has been trained to identify the circumstances or characteristics that may lead to a vulnerable situation; the following list provides factors that may be used to identify and record vulnerability:

1. **Disability:** the customer, or a permanent member of the household, is disabled (including learning disabilities). For example, they have been identified as a person within the scope of the Chronically Sick and Disabled Persons Act 1970.
2. **Age:** the customer is of pensionable age.
3. **Capacity:** the customer is learning disabled, has speech impairments, a low level of literacy, or does not speak English fluently.
4. **Chronic illness:** the customer, or a permanent member of the household, suffers from long term ill-health (including mental ill-health).

5. **Circumstantial:** the customer has had a temporary change in circumstances which means that they are less likely to be able to access our services or be at risk of significant detriment. Such a change to circumstances may include bereavement, pregnancy, personal injury or financial position.
6. **Landline dependency:** the customer has a telecare system (lifeline alarm or similar); they use a textphone (text relay) on a fixed line; they are signed up to network controlled calling and/or 123 or 118 barring (or similar). Or they identify as having a disability or accessibility requirement that would indicate they are more reliant on their landline and/or broadband service requiring a priority fault repair. Or they have a VoIP service with no back up if there is a power or network failure.

Each customer service adviser has been trained to recognise that customers may find it difficult to disclose intimate details of personal circumstances or characteristics and to handle such situations with sensitivity, respect, and tact.

### Recording vulnerability

A record of a customer's needs will be added to their account as well as the inclusive services discussed or provided. Before making such a record we'll gain the customer's consent and ensure they know what we are recording and why. As a broad principle, we seek to hold the least amount of personal information that allows us to offer an inclusive service. For more on how we look after a customer's personal information please read our [privacy policy](#).

## Inclusive and accessible services

### Relay services

If you have difficulty with your hearing or speech you can use text relay (also known as Relay UK). When you are on a call, if you have difficulty hearing, the Relay Assistant types what the other person is saying and if you have difficulty speaking, the Relay Assistant will speak the words you type. If you have a textphone dial 18001 followed by the full telephone number to make a call. Someone calling you should dial 18002 followed by your telephone number. You can also use the service with your mobile, tablet or PC by downloading the Relay UK app. For more information visit [www.relayuk.bt.com/](http://www.relayuk.bt.com/)

### SignVideo service

If you have difficulty with your hearing or speech and wish to use British Sign Language to contact us via an interpreter you can use our SignVideo service. To use this service you will need to be on a PC, Mac, Laptop, Smartphone or Tablet and when you are ready you can then click the SignVideo Link button on our '[contact us](#)' page. This will take you to a page that will connect you with a member of the SignVideo team. SignVideo will in turn call UW so they can interpret the information via sign language from, and then back to you by speaking to a member of the UW customer service team. For more information click [here](#).

## Accessible communications

If you find it difficult to read your bills and other written communications, we can provide them in various alternative formats, including, Braille, large print, on coloured paper or in audio format.

## Bill management

We can arrange for your bills to be sent to someone you choose to nominate if they agree to receive them on your behalf. They will also be able to help you manage the account but you will remain responsible for paying your bills.

## Free 195 directory enquiries

If you are unable to hold or read a printed directory because of sight loss or other disability, you can access free directory enquiries by dialling 195. The Operator can also connect you and you'll be charged as if you'd dialled the number yourself. Before you can use this service, you need to fill in an application form and have it countersigned by a doctor, nurse or other medical practitioner who knows you. Call free on **0800 587 0195** to get an application form.

## Emergency SMS

Hearing and speech impaired customers can get in contact with the emergency services by sending a text message (SMS) on a mobile phone to **999** or **112**. The message will be passed to the police, ambulance service, fire rescue, or coastguard who will be able to reply. To register text 'register' to **999**, and follow the instructions you are sent.

## 999 BSL

999 BSL is a service that connects you to British Sign Language Interpreters remotely through an app or a web-based platform, who then will relay the conversation with the call handler and emergency authorities.

The 999 BSL service is for emergency situations ONLY, for example if someone is seriously injured; lives at risk; being in danger or harm; a serious offence is in progress or just has been committed. For less urgent situations, please use Police 101 (wherever possible) and NHS111 through SignVideo - not 999 BSL, unless there is an emergency.

There are two ways to reach the emergency authorities through 999 BSL service and they are:

- iOS and Android App (smartphone and tablet)
- Web-based ([www.999bsl.co.uk](http://www.999bsl.co.uk))

For more information click [here](#).

## Priority fault repair

Priority Fault Repair is a free service for customers who rely on their Utility Warehouse Broadband and Telephone services for health and mobility reasons. If you're eligible, you'll get priority when you report a fault to us. The service is only available to you if your household includes someone at risk, or someone with accessibility requirements.

[Contact us](#) for more information.

## Complaints

Our complaints handling procedure is readily accessible to all customers, and can be provided in a number of alternative formats, including large print, on coloured paper or braille, to ensure that customers with disabilities are able to lodge and progress a complaint with ease.

## **Inclusive and accessible services**

This policy is regularly reviewed to ensure it meets the needs of vulnerable customers. We also regularly assess the performance of our advisors and customer complaints to ensure that we continue to effectively support customers who need extra help.

Please [contact us](#) if you would like a copy of this policy in large print or braille.