giffgaff Policy

Accessibility and Vulnerable Members

Introduction

It's crucial we support members who may be vulnerable or have a disability that requires specific service needs. By identifying them, we can use our operating procedures to make sure they receive a consistent approach that takes account of their particular circumstances and meets their particular needs.

Objective

The purpose of this policy is to demonstrate how giffgaff is meeting its legal and regulatory obligations around accessibility and vulnerability and delivering the vulnerable members outcomes detailed below.

giffgaff obligations

giffgaff has general and specific obligations relating to members with disabilities and those in vulnerable situations:

- **OFCOM:** General Conditions of Entitlement Condition C5 – Measures to meet the needs of vulnerable consumers and end users with disabilities.
- **FCA:** Requires firms to identify and support customers who are unable to make an informed decision at a specific point in time.
- **Equality Act 2010:** All services must be accessible for persons with disabilities

Definitions and interpretations

FCA definition:
A vulnerable consumer is someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when a firm is not acting with appropriate levels of care.

Defining vulnerability – The Three Cs:
There are different types of vulnerability, and underlying situations where customers may experience varying degrees of vulnerability. These have been grouped into three key headings:

- **Channel & Access:** things like hearing, sight, language barriers and physical disability
- **Comprehension:** things like mental capacity, low financial understanding and issues relating to old age such as dementia
- **Circumstances:** things like childbirth, those suffering bereavement, family breakdown, illness or financial difficulties

This policy combines accessibility and vulnerability but acknowledges that a member can have a disability and not be vulnerable or can be considered vulnerable without having a disability.

Education and training

giffgaff is committed to acting professionally, fairly and with integrity. giffgaff ensures appropriate training is provided to all relevant members of staff – both permanent employees and temporary workers – to ensure they are aware of the Laws, Regulations and local policies that impact their day-to-day work.

Social Channels

We also monitor our social channels and ensure that any vulnerable individuals are provided with the support they require.

Mobile devices

We have a broad range of devices that can be customised with accessibility features and settings to suit the individual needs of customers with disabilities.

Bereavement and Power of Attorney (POA)

giffgaff has a member relations team who are able to support bereaved members, those who have been diagnosed with a terminal illness and POA's. Members can reach this department by contacting bereavement@giffgaff.com. The team take inbound requests from members and also process emails/voicemail calls and correspondence with POAs.

Contacting giffgaff

There are a number of different ways to contact us, these include:
- Online via [form](#)
- [Email](#)
- Voicemail service calling this number – 0330 041 4802
- Writing to us – giffgaff Ltd, Belmont House, Belmont Road, Uxbridge UB8 1HE
- Next Generation Text Service (NGTS) for those who are deaf, hard of hearing or speech impaired

Complaints handling

giffgaff is committed to ensuring that fair outcomes are provided for all its members that have made an expression of dissatisfaction. For more information on how to submit a complaint please visit this page [here.](#)

Policy adherence

Adherence to the procedures set out in this policy are monitored and measured through the following:

Quality monitoring (includes adherence to the requirements of Ofcom Condition 5)
Complaints and root cause analysis
Member feedback about Advisors.