

Vulnerable Customer Policy

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The purpose of this policy is to ensure that the operations of TG Builders Merchants & TG Dream Kitchens and Bathrooms do not have any negative impact upon vulnerable customers.

For the purposes of this policy vulnerable customers are customers and prospective customers whose ability or circumstances require us to take extra precautions in the way that we sell and provide our services to ensure that they are not disadvantaged in any way.

What is a vulnerable customer?

The Financial Conduct Authority (FCA) defines a vulnerable customer 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.”

The FCA expects firms like ourselves to treat customers fairly when we are dealing with people with vulnerable circumstances.

Identifying a vulnerable customer

Our staff are trained to identify vulnerable customers so we can take extra steps to assist outside of our standard procedures. However, it is not always possible to recognise these characteristics. Therefore, if you believe you may fit the criteria for a vulnerable customer, please read this policy and notify us immediately of your particular needs.

Vulnerability groups

We recognise that certain groups of customers may be vulnerable. Whilst not all customers in these groups may be vulnerable, we will consider a customer’s individual circumstances where a potential vulnerability is identified. These groups may include, but are not restricted to:

- Customers with communication difficulties (including learning difficulties and English not being their first language, dyslexia)
- A customer with a reduction in physical or mental capacity
- Customer with health issues - illness, whether physical or mental illness, severe or long term
- A sudden diagnosis of serious illness to the customer or close family member
- Personal circumstances of the customer – factors such as financial difficulties, bereavement, caring responsibilities or redundancy
- The customers age particularly older and younger people. For example, a younger person may be considered inexperienced and the older person may be less technologically able

Our key principles when engaging with a vulnerable customer

As soon we think we may be engaging with a vulnerable customer, whether this is through our identification or you are approaching us, we will:

- Immediately make a record of this and ensure we adhere to this policy
- Provide additional opportunities for you to ask questions about the information we have provided
- Continuously seek confirmation that you have understood the information that has been provided
- Ask if there is anybody with you who is able to assist. If not, and we believe this will be beneficial, we will make arrangements to continue with the subject matter at another time
- Offer you the opportunity to complete the transaction after a period of further consideration

Any information gathered will be processed in line with GDPR and the Data Protection Act 2018. Where necessary, explicit consent will be obtained from a customer to enable us to process the details of their vulnerability accordingly. Customers will also be fully informed of how we will process this information.

We will always:

- Ask for a customer's explicit consent in order to record, store or process the details of their vulnerability, where it is necessary and appropriate to do so
- Clearly explain to the customer why we need to record, store or process the details of their vulnerability

- Clearly explain to the customer who the details of their vulnerability will be shared with

Typically, we would only look to process the details of a customer's vulnerability where we may need to tailor our approach during our communications with them, or when we are entering their home for the purposes of a sales consultation or installation. We would therefore only share the details of the vulnerability with the relevant staff and representatives.

If we can't help a customer, we will try and make sure that they understand what alternative options are available to them.

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