

## First Leasing UK Limited T/A Scaffold Finance Vulnerable Customer Policy

### 1. Introduction

At Scaffold Finance, we are committed to providing excellent service to all of our customers, including those who may be vulnerable. This policy outlines our approach to identifying and assisting vulnerable customers to ensure their needs are met and they receive the necessary support throughout their interaction with us.

### 2. Definition of Vulnerability

A vulnerable customer is someone who, due to their personal circumstances, is at risk of being unable to fully understand, make informed decisions, or access our services in the same way as others. Vulnerabilities may be permanent, temporary, or situational, and may include but are not limited to:

1. **Hard of Hearing:** Customers with impaired hearing who may require additional communication methods to engage effectively.
2. **Partially Blind:** Customers with visual impairments who may benefit from larger print or alternative document formats.
3. **Unable to Read or Write in English:** Customers who may have language barriers and require assistance in understanding our offerings.
4. **Unable to Speak English:** Customers who may have difficulty communicating in English may need support to express their needs.
5. **Financial Hardship:** Customers who are unable to afford lease or loan agreements and may require alternative solutions or financial guidance.
6. **Mental Impairment:** Customers with cognitive challenges that affect their decision-making abilities and require extra patience and support.
7. **Identifying Vulnerable Customers**

Our staff is responsible for identifying potentially vulnerable customers during interactions. This may involve actively listening to their needs, asking open-ended questions, and observing any cues that suggest a customer might require additional assistance. We encourage staff to treat all customers with empathy and respect.

Whilst our customer-facing teams have been trained on our Vulnerable Customer policy, we are by no way experts in this field and do not hold ourselves out to be. A

potential Vulnerable Customer may or may not know they are vulnerable. It may be that the individual(s) do/does not show any outward signs of vulnerability, or they do not bring this to our attention.

As a business, we can only use our best endeavours, our training and commonsense in spotting the signs.

#### 4. **Assisting Vulnerable Customers**

When identifying a vulnerable customer, staff should take the following steps:

1. **Active Listening:** Pay close attention to the customer's needs and concerns. Allow them to express themselves fully and be patient.
2. **Communication:** Adapt communication methods to suit the customer's preferences. This may include using larger print documents, providing multilingual support, or utilizing communication aids.
3. **Accessibility:** Ensure all documents and materials are accessible and provide alternative formats as necessary.
4. **Financial Guidance:** For customers facing financial difficulties, explore alternative solutions, flexible payment options, or refer them to appropriate financial counselling services.
5. **Empathy and Patience:** Demonstrate understanding and patience when dealing with mentally impaired customers, allowing them the time they need to make decisions.
6. **Confidentiality**

All information obtained from vulnerable customers must be treated with the utmost confidentiality. This information should only be shared on a need-to-know basis and with the customer's explicit consent.

#### 6. **Staff Training**

Regular training is provided to our staff to raise awareness of vulnerable customers, equip them with communication skills, and educate them on how to provide appropriate support.

#### 7. **Review and Improvement**

This policy will be reviewed at the start of every calendar year to ensure its effectiveness and to make any necessary improvements. Feedback from staff and customers will be actively sought and incorporated.

At Scaffold Finance, we are dedicated to ensuring that all our customers receive fair and equal treatment, regardless of their vulnerabilities. This policy serves as a guide for our staff to provide the necessary assistance and support to vulnerable customers, fostering a positive and inclusive experience for everyone.

### **Actions we take:**

**Hard of hearing.** We would look to use other forms of communication such as detailing information via an email.

**Partially blind.** Offering to send information in a written format using a larger font size. Please note, this is not possible with the standard finance and leasing documentation we use.

**Unable to read or write in English.** As you would be entering into a legally binding contract covered by the UK legal system, being able to read and fully understand English is very important. If you cannot read English, then we would have to get a signed letter from a solicitor appointed by you who has explained the agreement, the terms and conditions the financial commitment you are entering into. Without this letter from a solicitor, we would not proceed with any agreement.

**Unable to speak English.** The same would apply if you cannot either fully or partially speak or understand English. To protect yourselves, our employees, our company and the funders we represent, we would expect a third-party solicitor to confirm in writing you fully understand the agreement and the financial liability you are undertaking.

**Financial hardship.** This can sometimes be very challenging for us to recognise. Your bank statement may show a few returned direct debits, whilst we may say this represents financial hardship, you may say no. We also do not always investigate an individual's personal financial situation when it comes to commercial lending to a business or organisation. As we are not party to your private financial affairs, we reasonably would not know if you were in financial hardship.

In most instances, we are only aware of financial hardship when a customer is part-way through a commercial finance agreement and an individual brings financial hardship to our attention. We will use our best endeavours to assist you and will speak with the funder on your behalf. As we are mainly a broker and not a lender,

we are not the company you have a legal relationship with, hence cannot set out what the outcome will be.

**Mental impairment.** Our employees have not been trained on mental impairment other than a basic knowledge gained at our company via training and through life skills. Hence, in a commercial situation, if a prospect or customer hides the fact they are mentally impaired, it is reasonable to expect we would not be aware of this.

Mental impairment can also mean different things to people and there is a very wide scope of impairment, where some signs are very obvious to our employees, others may not be.

If you feel that you are mentally impaired and are aware of this, please bring it to our attention so we can provide more clarity around financial documentation and the obligations you will be undertaking. We may well ask for third parties to confirm they have read and understood the terms and conditions and they have spoken to you about this prior to an agreement commencing.