



Inspiring trust for a more resilient world.



Delivering fair, flexible and inclusive services for all

Find out how **BS ISO 22458: Consumer Vulnerability** can help service providers to understand, identify and support consumers in vulnerable situations.



Anyone can be vulnerable at any time, placing them at risk of harm. It is important that organizations understand the risk factors that contribute to vulnerability and how these impact people's lives, so that they can identify and support consumers who are struggling or disadvantaged.

BS ISO 22458 is a voluntary international standard that provides guidance for organizations, helping them to design and deliver fair, flexible and inclusive services, which can reduce risks and improve positive outcomes for consumers in vulnerable situations.

Importance of addressing consumer vulnerability

Vulnerability affects millions of consumers. Everyone has different needs, abilities, characteristics and personal circumstances. Negative life events such as illness, bereavement and job loss can have a significant and sudden impact on consumers' lives.

The risk factors for vulnerability are complex and can change over time, but they all place consumers in situations where they are at greater risk of experiencing harm in their interactions with service providers. Being vulnerable can make it difficult to:

- access or choose services
- understand or communicate information
- pay for services
- make good decisions
- pursue complaints and obtain redress

External factors, such as natural disasters and economic conditions, can increase vulnerability. For example, the Covid-19 pandemic had a negative impact on consumers'

physical and mental health and household finances. In October 2020 the Financial Conduct Authority (FCA) estimated that 27.7 million adults (53%) were living with one or more characteristics of vulnerability, an increase of 3.7 million since the beginning of the pandemic.

It is important to recognize that vulnerability doesn't always lead to harm. How organizations design systems and treat consumers can increase or decrease the risk of harm occurring. As it is difficult to know when or how someone might be vulnerable, it is vital that service providers plan for vulnerability. BS ISO 22458¹ can help organizations to adopt an inclusive approach, which can minimize harm and make sure the right support is available for those who need it.

¹ BS ISO 22458: 2022 – Consumer Vulnerability – Requirements and guidelines for the design and delivery of inclusive service

Who should use BS ISO 22458 and why?

BS ISO 22458 may be used by any organization that provides services to consumers, regardless of size, type or location. However, supporting consumers in vulnerable situations is particularly important in essential services - such as energy, water, telecoms, healthcare and banking - which are central to consumers' lives and have the potential for serious harm if things go wrong.

BS ISO 22458 aims to help businesses provide meaningful support for consumers in vulnerable situations. The standard is voluntary but organizations that choose to comply are demonstrating their commitment to 'doing the right thing' for all consumers. Following the standard can help them to:

- improve quality, inclusivity and customer satisfaction
- increase their customer base
- reduce complaints
- minimize consumer harm
- achieve compliance with national obligations related to fairness and equality
- build loyalty and trust.

Journey from BS 18477 to BS ISO 22458

In the UK, BS ISO 22458 will replace BS 18477: Inclusive Service Provision, which was published by BSI in 2010. This was a pioneering standard at the time, developed by consumer stakeholders who wanted to raise awareness of consumer vulnerability and encourage businesses to provide fair and flexible services.

The standard has been used widely in the essential services sector. The Financial Ombudsman Service (FOS) was the first organization to adopt the standard's guiding principles to improve its service to consumers. BS 18477 was cited by Ofgem as a way for suppliers to meet their vulnerability obligations and has also been referenced as good practice by Ofwat and the FCA.

When BS 18477 came up for review, [Consumer and Public Interest Network \(CPIN\)](#) with the support of BSI, proposed it was converted into an international standard. CPIN recognized consumer vulnerability as a global issue and wanted to develop good practice that could be applied consistently across borders. The definition of vulnerability and industry practice had evolved considerably since 2010 and it was important to bring the guidance up to date.

Experts from 16 countries - including the UK, Australia, Canada, Malaysia and Japan - came together to develop the content of the standard, sharing insight and best practice to build on the requirements of BS 18477. [CPIN](#), [ANEC](#) and [Consumers International](#) actively participated to strengthen the consumer voice.

CPIN proactively collaborated with UK consumer stakeholders, such as Fair by Design, Macmillan, Which?, StepChange, Scope, Mind, and Age UK to understand the needs and experiences of vulnerable consumers and identify key objectives. The result is a strong consumer-focused standard that reflects best practice from around the world and can be applied across all service sectors and countries.



BS ISO 22458: Key requirements and recommendations

The standard specifies good practice for the design and delivery of inclusive services in the following areas.



Guiding principles

Meaningful change must be driven by genuine commitment from top management, leading to a shift in mindset and organizational culture. All frontline staff need to understand vulnerability and why it is important. BS ISO 22458 defines nine guiding principles that should underpin inclusive service provision:

- Accountability
- Empathy
- Empowerment
- Fairness
- Flexibility
- Inclusivity
- Innovation
- Privacy
- Transparency



Inclusive design approach

Organizations should be proactive in reviewing their systems, processes and procedures through a 'vulnerability lens' to make sure they don't create unfair or unnecessary barriers to those in vulnerable situations. This will help them to reduce the risk of harm and make their services accessible and easier to use for everyone.

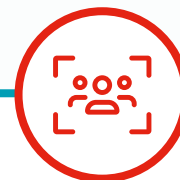
The standard states that inclusive design should be considered at all points where consumers interact with the organization e.g. contact centres, published materials, bills, websites, and complaints processes. It is vital that consumers are involved in service design so that their needs and experiences are taken into account.



Understanding vulnerability

To deliver inclusive services that meet consumer needs and mitigate risks, organizations must take proactive steps to understand the nature, scale and impact of vulnerability within their existing and potential customer base. To achieve this the standard recommends:

- undertaking research to map vulnerability characteristics;
- building partnerships with organizations that represent vulnerable consumers;
- engaging with consumers who have lived experience of vulnerability;
- monitoring customer satisfaction, feedback and complaints and using it effectively to inform continual improvement.



Identifying vulnerability

Vulnerability is not always obvious. Many people don't think of themselves as vulnerable or may be unwilling to share personal information. BS ISO 22458 explains how to identify signs of vulnerability through staff observation and digital tools. For example, difficulty remembering personal information, a sudden change in spending habits or missing payments could all be signs of someone struggling.

The standard offers guidance on how to encourage individuals to share relevant information about vulnerability, by asking sensitive questions and providing reassurance about the benefits of disclosure.



Responding to vulnerability

When organizations recognize that an individual is vulnerable, they should act to reduce the risk of harm by providing fair, flexible support that suits the consumer and their circumstances. For example, this could include providing information in an alternative format, offering a payment holiday, suggesting a new tariff or payment plan or signposting to external advice and support.

It is important that consumers are asked about their needs and preferences so that they can be involved in the decision-making process. Service providers should also look at the root of the problem to see if system changes could prevent other consumers experiencing similar problems in the future.



Personal information

Customer records are important to ensure that consistent and appropriate support is given, but personal information should be managed with the utmost care. BS ISO 22458 states that frontline staff should only record the minimum information necessary and clearly explain what is being written down, how it will be used and why.

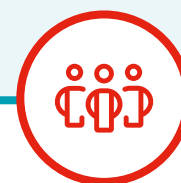
The standard provides guidance on how to keep effective customer records while safeguarding personal information and respecting consumer privacy.



Dealing with third parties

Consumers in vulnerable situations sometimes make arrangements (formal or informal) for a third party to deal with service providers on their behalf. For example, a friend, family member, carer or legal representative.

BS ISO 22458 offers guidance on how frontline staff should deal with third-party representatives, how to check credentials and what to do if they suspect a third party is acting fraudulently or not in the customer's best interests.



Frontline staff

Frontline staff play a key role in identifying and supporting consumers in vulnerable situations. BS ISO 22458 recognizes the importance of staff training, specifying what should be covered. It also states that staff should have access to specialist information and advice and be empowered to make decisions about flexible support options, reducing the need for customers to speak to lots of different staff and departments.

Consumer and Public Interest Network (CPIN)

CPIN is an independent network of trained consumer volunteers, supported by BSI, which exists to represent the consumer voice in British Standards.

CPIN works closely with other consumer and public interest organizations in the UK, and beyond, to build better British Standards.



To find out more about CPIN and consumer participation in standards visit the consumer pages on the BSI website: www.bsigroup.com/consumers

Further information

ANEC

European consumer voice in standards

anec.eu

 @anectweet

BSI

UK's national standards body

To find out more about how standards are developed, the benefits they can offer to responsible businesses and how to get involved.

bsigroup.com

 @bsi_UK

To search, or buy, standards published by BSI.

shop.bsigroup.com

Consumers International

Membership organization for international consumer groups.

consumersinternational.org

 @consumers_int

ISO

International organization for standardisation

iso.org

 @isostandards and @isoconsumers

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