

Comparing British Standard  
(BS) 18477:2010 to International  
Organisation for Standardisation  
(ISO) 22458

As the pandemic has shown, we can all become vulnerable at any time. Ill health, financial hardship, mental health problems or life events such as relationship breakdown can impact anyone. For consumers, that vulnerability makes it so much harder to make smart, informed choices.

BS 18477 helps organisations identify and meet the needs of vulnerable customers. In 2022, a new international standard, ISO 22458 was developed and published from this ground-breaking British standard. This document compares the two, highlighting areas of similarity and difference.

From these standards, we can pick out the following steps that should be followed by any organisation to make sure it's as inclusive and accessible to vulnerable consumers as possible, at every stage of its design and delivery:



BS 18477	ISO 22458	Comments
0 Introduction	Introduction	These have the same intention.
1 Scope	1 Scope	These have the same intention.
	2 Normative references	There are no normative references in ISO 22458.
2 Terms and definitions	3 Terms and definitions	Addition of Artificial Intelligence, Essential service, Frontline staff, Service-related product, Touchpoint and Vulnerable situation
3 Guiding principles for inclusive service provision 3.1 General"	4 Organisational commitment, principles and strategy	These have the same intention.
3.2 Commitment to customer service and inclusivity	4.1 Commitment	These have the same intention.
3.5 Transparency 3.6 Accessibility 3.9 Fairness 3.10 Awareness"	4.2 Principles	4.2 has brought together a few clauses from 18477 and added further principles which will be clearly communicated to staff at all levels."
	4.3 Strategy	This is a new clause heading.
	4.3.1 Outcomes focused	This is a new requirement – it brings together several clauses from clause 3 in 18477 with a new requirement that 'the organisation shall be outcomes focused', with 6 sub-clauses.

- No change
- Enhanced clause
- New clause/requirement

	4.3.2 Responsibility	This is a new requirement – a specific requirement on designating specific member(s) of staff with overall responsibility.
	4.3.3 Proactive needs-based approach	This is a new clause – the intent was in the previous standard, now formalised into a specific clause.
5.5 Policies and procedures 5.5.1 General	4.3.4 Policies	This is an enhanced clause – it takes the previous clause and adds the requirement for the policies that will be developed as a minimum.
<b>5 Planning, design and development of inclusive service delivery</b>	<b>5 Inclusive design</b>	This is only a heading.
5.1 General 5.4 Planning for inclusive provision of services	5.1 General	"This is an enhanced clause in terms of structure, but the intention remains the same – it takes the previous clause and adds more structure and specific sub-clauses."
	5.2 Touchpoints	New clause, however the intention remains the same – this clause is used as a signpost to later clauses.
5.2 Review existing service 5.2.1 Impact assessment	5.3 Understanding consumer vulnerability	The intention remains the same across these, it is just presented in a different way and new terminology has been used (e.g. consumer insight methodology, stakeholder partnerships, user research). Clause is now more structured and easier to understand and the terminology used tends to be used already in organisations so appears more aligned.
	5.3.1 Consumer insight methodology	
	5.3.2 Research and mapping	
	5.3.3 Stakeholder partnerships	
	5.3.4 User research	

- No change
- Enhanced clause
- New clause/requirement

<b>3.7</b> Communication <b>5.7</b> Provision of information <b>5.11.2.2</b> (sub clause in Enquiries and complaints)	<b>5.4</b> Consumer contact channels	References to contact channels are mentioned in 18477, however more detail has been added to the new standard and given a specific section of the standard.
	<b>5.4.1</b> Choice	
	<b>5.4.2</b> Ease of use	
	<b>5.4.3</b> Awareness	
	<b>5.4.4</b> Telephone services	
	<b>5.4.5</b> Online services	
<b>5.7</b> Provision of information <b>5.8</b> Promotions and marketing	<b>5.5</b> Consumer information	Presented in a different way but the intention of these points remain the same.
	<b>5.5.1</b> General	
	<b>5.5.2</b> Presentation of key information	
<b>5.9</b> Sales activities <b>5.10</b> Contracts and sales documentation <b>5.10.1</b> Responsibilities of sales agents <b>5.10.2</b> Contract forms <b>5.10.3</b> Right to cancel and acknowledgement of cancellation	<b>5.6</b> Sales and contracts	Presented in a different way but the intention of these points remain the same.
	<b>5.6.1</b> Sales code of conduct	
	<b>5.6.2</b> Contract terms	

- No change
- Enhanced clause
- New clause/requirement

5.10.4 "Safety net" procedures and acting responsibly to non-payment	5.7 Payments and billing	Presented in a different way but the intention of these points remain the same.
	5.7.1 Choice and flexibility of payments	
	5.7.2 Acting responsibly to non-payment	
5.6 Billing	5.7.3 Billing	
5.11.2 Enquiries and complaints 5.11.3 Problem resolution	5.8 Complaints and disputes	Presented in a different way but the intention of these points remain the same.
3.3 Resources 5.12 Resources (including training)	<b>6 Resources to support service delivery</b>	This is an enhanced/new clause – it takes the previous clauses and adds a few additional requirements. For example, 6.2.3.2 Training records and 6.2.3.3 Training Programme review. It tidies up the resource clause, which was split into a few areas in BS 18477.
	6.1 General	
5.12.1 Determine resources needed	6.2 Frontline staff 6.2.1 Resources	
5.4 Planning for inclusive provision of services 5.11.2.3	6.2.2 Empowerment	
3.4 Competence 5.12.2 Training	6.2.3 Training in consumer vulnerability	
	6.3 Artificial intelligence (AI) systems	This is a new requirement.

- No change
- Enhanced clause
- New clause/requirement

<b>3.8 Confidentiality</b> <b>5.5.2 Using and managing records</b>	<b>6.4</b> Management of consumer vulnerability data	This is an enhanced/new clause – more detail has been added to ISO 22458 around data protection. Since BS 18477:2010, GDPR has come into effect.
	<b>6.4.1</b> General	
	<b>6.4.2</b> Data policy	
	<b>6.4.3</b> Privacy and security	
	<b>6.4.4</b> Informed consent	
	<b>6.4.5</b> Internal data sharing	
	<b>6.4.6</b> External data sharing	
<b>5.5.2.4</b> third parties	<b>6.5</b> Dealing with third-party representatives	This is an enhanced clause – the organisation will now have a policy for guidance to frontline staff on how to deal with third-party representatives. More detail has been added to the new clause.
<b>5.10.4.2</b> provision of service temporarily suspended	<b>6.6</b> Interruptions to service	This is an enhanced/new requirement – more detail has been added to ISO 22458 around interruption to service (operational problem in BS 18477). There's also much more structure to the clause.
	<b>6.6.1</b> Interruption due to external events	
	<b>6.6.2</b> Interruption to essential services	

- No change
- Enhanced clause
- New clause/requirement

<b>4 Understanding risk factors</b>	<b>7 Identifying consumer vulnerability</b>	Presented in a different way but the intention of these points remain the same.
<b>4.1</b> Identifying consumer vulnerability <b>4.2</b> Identifying the needs of individual consumers <b>4.3</b> Dealing with consumer vulnerability	<b>7.1</b> General	
	<b>7.2</b> Risk factors	
	<b>7.3</b> Signs of vulnerability	
	<b>7.3.1</b> General	
	<b>7.3.3</b> Automated flags	This is a new requirement.
<b>4.3</b> Dealing with consumer vulnerability	<b>7.4</b> Encouraging sharing of vulnerability information	This is an enhanced clause – more detail added in ISO 22458.
<b>5.5.2</b> Using and managing records	<b>7.5</b> Recording information about vulnerability	This is an enhanced clause – more detail added in ISO 22458.
	<b>7.5.1</b> Creating customer records	
	<b>7.5.2</b> Referring to customer records	
	<b>7.5.3</b> Updating customer records	

- No change
- Enhanced clause
- New clause/requirement



	<b>8 Responding to consumer vulnerability</b>	This is a new area of the standard with no direct comparison to BS 18477. Elements of this are covered in the training clause 5.12.2, enquiries clause 5.11.2 and safety net 5.10.4.
	<b>8.1</b> General	
	<b>8.2</b> Taking action to improve outcomes for individuals	
	<b>8.2.1</b> Understanding risks and needs	
	<b>8.2.2</b> Understanding the individual's relationship with the organisation	
	<b>8.2.3</b> Response options	
	<b>8.2.4</b> Shared decision making	
	<b>8.2.5</b> Directing to specialist information, advice, and support	
	<b>8.3</b> Taking action to improve outcomes for others	
	<b>9 Monitoring, evaluation, and improvement</b>	This is only a heading.
<b>5.11</b> Customer satisfaction, enquiries, and complaints <b>5.11.1</b> Performance indicators of customer satisfaction <b>6.5</b> Monitoring	<b>9.1</b> Monitoring	These are presented in a different way but the intention remains the same with one additional sub-clause. Covered in Clause 5.8 of ISO 22458. Reference made to ISO 10002 (both standards). The addition of proactively seeking staff feedback.

- No change
- Enhanced clause
- New clause/requirement

<b>6 Compliance, evaluation, and improvement</b> <b>6.1</b> Commitment <b>6.2</b> Responsiveness <b>6.3</b> Proactive approach <b>6.4</b> Foresight <b>6.5</b> Monitoring <b>6.6</b> Review of policies and procedures	<b>9.2</b> Evaluation	Presented in a different way but the intention of these points remain the same.
<b>6.7</b> Continual improvement	<b>9.3</b> Continual improvement	Worded slightly differently but the intention of these points remains the same.
<b>Annex A - Guidance for organisations on how to implement ISO 22458</b>		
	<b>A.1</b> Considering inclusive service at all stages of service design and delivery	
	<b>A.2</b> Implementation checklist	
	<b>A.3</b> Commitment to change	
<b>5.2</b> Review existing service	<b>A.4</b> Conduct gap analysis	Impact assessment is not mentioned in the main section of ISO 22458. This is now in the appendix. Other elements of 5.2 are covered in ISO 22458 clause 5.3.
<b>5.3</b> Identify areas requiring attention	<b>A.5</b> Create action plan	Objectives are not mentioned in the main section of ISO 22458. This is now in the appendix.
	<b>A.6</b> Implement changes	
	<b>A.7</b> Monitor, evaluate and improve (see clause 9)	

- No change
- Enhanced clause
- New clause/requirement

<b>BS 18477</b>	<b>ISO 22458</b>	<b>Comments</b>
<b>0 Introduction</b>	<b>Introduction</b>	These have the same intention.
<b>1 Scope</b>	<b>1 Scope</b>	These have the same intention.
	<b>2 Normative references</b>	There are no normative references in ISO 22458.
<b>2 Terms and definitions</b>	<b>3 Terms and definitions</b>	Addition of Artificial Intelligence, Essential service, Frontline staff, Service-related product, Touchpoint and Vulnerable situation.
<b>3 Guiding principles for inclusive service provision</b> <b>3.1 General"</b>	<b>4 Organisational commitment, principles and strategy</b>	These have the same intention.
<b>3.2 Commitment to customer service and inclusivity</b>	<b>4.1 Commitment</b>	These have the same intention.
<b>3.3 Resources</b> <b>3.4 Competence</b>	<b>6 Resources to support service delivery</b> <b>6.1 General</b> <b>6.2.3 Training in consumer vulnerability</b>	This is an enhanced/new clause – it takes the previous clauses and adds a few additional requirements. For example, 6.2.3.2 Training records and 6.2.3.3 Training Programme review. It tidies up the resource clause, which was split into a few areas in BS 18477.
<b>3.5 Transparency</b>	<b>4.2 Principles</b>	4.2 has brought together a few clauses from 18477 and added further principles which will be clearly communicated to staff at all levels.
<b>3.6 Accessibility</b>		

- No change
- Enhanced clause
- New clause/requirement

3.7 Communication	<b>5.4 Consumer contact channels</b> <b>5.4.1 Choice</b> <b>5.4.2 Ease of use</b> <b>5.4.3 Awareness</b> <b>5.4.4 Telephone services</b> <b>5.4.5 Online services</b>	References to contact channels are mentioned in 18477, however more detail has been added to the new standard and it has been given a specific section of the standard.
3.8 Confidentiality	<b>6.4 Management of consumer vulnerability data</b> <b>6.4.1 General</b> <b>6.4.2 Data policy</b> <b>6.4.3 Privacy and security</b> <b>6.4.4 Informed consent</b> <b>6.4.5 Internal data sharing</b> <b>6.4.6 External data sharing</b>	This is an enhanced/new clause – more detail has been added to ISO 22458 around data protection. Since BS 18477:2010, GDPR has come into effect.
3.9 Fairness	4.2 Principles	4.2 has brought together a few clauses from 18477 and added further principles which shall be clearly communicated to staff at all levels.
3.10 Awareness		
<b>4 Understanding risk factors</b>	<b>7 Identifying consumer vulnerability</b>	This is only a heading.
4.1 Identifying consumer vulnerability	<b>7.1 General</b> <b>7.2 Risk factors</b> <b>7.3 Signs of vulnerability</b> <b>7.3.1 General</b> <b>7.3.2 Frontline staff observation</b> <b>7.4 Encouraging sharing of vulnerability information</b>	Presented in a different way but the intention of these points remain the same.
4.2 Identifying the needs of individual consumers		
4.3 Dealing with consumer vulnerability		

- No change
- Enhanced clause
- New clause/requirement

<b>5 Planning, design, and development of inclusive service delivery</b>	<b>5 Inclusive design</b>	
<b>5.1</b> General	<b>5.1</b> General	The intention remains the same, these are just presented in a different way and new terminology has been used (e.g. consumer insight methodology, stakeholder partnerships, user research). Clause is now more structured and easier to understand and the terminology used tends to be used already in organisations, so appears more aligned.
<b>5.2</b> Review existing service	<b>5.3</b> Understanding consumer vulnerability <b>5.3.1</b> Consumer insight methodology <b>5.3.2</b> Research and mapping <b>5.3.3</b> Stakeholder partnerships <b>5.3.4</b> User research	
<b>5.3</b> Identify areas requiring attention		Objectives are not mentioned in the main section of ISO 22458. This is now in the appendix.
<b>5.4</b> Planning for inclusive provision of services	<b>5.1</b> General <b>6.2.2</b> Empowerment	This is an enhanced clause in terms of structure, but the intention remains the same – it takes the previous clause and adds more structure and specific sub-clauses.
<b>5.5</b> Policies and procedures	<b>4.3.4</b> Policies	This is an enhanced clause – it takes the previous clause and adds the requirement for the policies that will be developed as a minimum.
<b>5.5.1</b> General		

- No change
- Enhanced clause
- New clause/requirement

<p><b>5.5.2</b> Using and Managing Records</p>	<p><b>6.4</b> Management of consumer vulnerability data  <b>6.4.1</b> General  <b>6.4.2</b> Data policy  <b>6.4.3</b> Privacy and security  <b>6.4.4</b> Informed consent  <b>6.4.5</b> Internal data sharing  <b>6.4.6</b> External data sharing  <b>7.5</b> Recording information about vulnerability  <b>7.5.1</b> Creating customer records  <b>7.5.2</b> Referring to customer records  <b>7.5.3</b> Updating customer records  <b>6.5</b> Dealing with third-party representatives</p>	<p>This is an enhanced/new clause – more detail has been added to ISO 22458 around data protection. Since BS 18477:2010, GDPR has come into effect.</p>
<p><b>5.6</b> Billing</p>	<p><b>5.7.3</b> Billing</p>	<p>Presented in a different way but the intention of these points remain the same.</p>
<p><b>5.7</b> Provision of information</p>	<p><b>5.4</b> Consumer contact channels  <b>5.4.1</b> Choice  <b>5.4.2</b> Ease of use  <b>5.4.3</b> Awareness  <b>5.4.4</b> Telephone services  <b>5.4.5</b> Online services  <b>5.5</b> Consumer information  <b>5.5.1</b> General  <b>5.5.2</b> Presentation of key information</p>	<p>Presented in a different way but the intention of these points remain the same.</p>
<p><b>5.8</b> Promotions and marketing</p>	<p><b>5.5</b> Consumer information  <b>5.5.1</b> General  <b>5.5.2</b> Presentation of key information</p>	<p>Presented in a different way but the intention of these points remain the same.</p>

- No change
- Enhanced clause
- New clause/requirement

<b>5.9</b> Sales activities		Presented in a different way but the intention of these points remain the same.
<b>5.10</b> Contracts and sales documentation		
<b>5.10.1</b> Responsibilities of sales agents		
<b>5.10.2</b> Contract forms		
<b>5.10.3</b> Right to cancel and acknowledgement of cancellation	<b>5.6</b> Sales and contracts <b>5.6.1</b> Sales code of conduct <b>5.6.2</b> Contract terms	Presented in a different way but the intention of these points remain the same.
<b>5.10.4</b> "Safety net" procedures and acting responsibly to non-payment		
<b>5.11</b> Customer satisfaction, enquiries, and complaints		
<b>5.11.1</b> Performance indicators of customer satisfaction		
<b>5.11.2</b> Enquiries and complaints	<b>9.1</b> Monitoring	Presented in a different way but the intent remains the same with 1 additional sub-clause. Covered in Clause 5.8 of ISO 22458. Reference made to ISO 10002 (both standards). The addition of proactively seeking staff feedback.
	<b>5.4</b> Consumer contact channels <b>5.4.1</b> Choice <b>5.4.2</b> Ease of use <b>5.4.3</b> Awareness <b>5.4.4</b> Telephone services <b>5.4.5</b> Online services <b>5.8</b> Complaints and disputes <b>6.2.2</b> Empowerment	Presented in a different way but the intention of these points remain the same.

- No change
- Enhanced clause
- New clause/requirement

5.11.3 Problem resolution	5.8 Complaints and disputes	Presented in a different way but the intention of these points remain the same.
5.12 Resources (including training)	6 Resources to support service delivery 6.1 General	This is an enhanced/new clause – it takes the previous clauses and adds a few additional requirements. For example, 6.2.3.2 Training records and 6.2.3.3 Training Programme review. Tidies up the resource clause, which was split into a few areas in BS 18477.
5.12.1 Determine resources needed	6.2 Frontline staff 6.2.1 Resources	
5.12.2 Training	6.2.3 Training in consumer vulnerability	
<b>6 Compliance, evaluation, and improvement</b>		This is only a heading.
6.1 Commitment	9.2 Evaluation	Presented in a different way but the intention of these points remains the same
6.2 Responsiveness		
6.3 Proactive approach		
6.4 Foresight		
6.5 Monitoring		
6.6 Review of policies and procedures		
6.7 Continual improvement	9.3 Continual improvement	Worded slightly differently but the intention of these points remains the same.

- No change
- Enhanced clause
- New clause/requirement



**New clauses – no direct clause in BS 18477**

	<b>4.3</b> Strategy	
	<b>4.3.1</b> Outcomes focused	
	<b>4.3.2</b> Responsibility	
	<b>4.3.3</b> Proactive needs-based approach	
	<b>5.2</b> Touchpoints	
	<b>6.3</b> Artificial intelligence (AI) systems	
	<b>7.3.3</b> Automated flags	
	<b>8</b> Responding to consumer vulnerability	
	<b>8.1</b> General	
	<b>8.2</b> Taking action to improve outcomes for individuals	
	<b>8.2.1</b> Understanding risks and needs	
	<b>8.2.2</b> Understanding the individual's relationship with the organisation	
	<b>8.2.3</b> Response options	
	<b>8.2.4</b> Shared decision making	

- No change
- Enhanced clause
- New clause/requirement

	<b>8.2.5</b> Directing to specialist information, advice and support	
	<b>8.3</b> Taking action to improve outcomes for others	