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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:

Culture and strategy

Organisational
commitment to treating
customers fairly, embedded
through culture and
strategy (see
Clause 4).

Inclusive design and tools for delivery

Planning for vulnerability by making sure services are inclusive and adequately supported (see Clauses 5 and 6).

Identifying consumer vulnerability

Recognising signs of vulnerability, identifying risks and understanding individual needs (see Clause 7).

Responding to consumer vulnerability

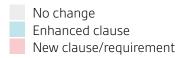
Providing a fair, flexible response that meets individual needs (see Clause 8).

Continual improvement

Regular review of service provision and consumer outcomes, learning from experience and making improvements (see Clause 9).

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 Transparency3.6 Accessibility3.9 Fairness3.10 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.

	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.
5 Planning, design and development of inclusive service delivery	5 Inclusive design	This is only a heading.
5.1 General5.4 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.
	5.3 Understanding consumer vulnerability	The intention remains the same across these, it is just
5.2 Review existing service5.2.1 Impact assessment	5.3.1 Consumer insight methodology	presented in a different way and new terminology
	5.3.2 Research and mapping	has been used (e.g. consumer insight methodology, stakeholder partnerships, user research). Clause is
	5.3.3 Stakeholder partnerships	now more structured and easier to understand and the terminology used tends to be used already in
	5.3.4 User research	organisations so appears more aligned.



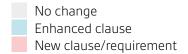
	5.4 Consumer contact channels	
	5.4.1 Choice	
3.7 Communication 5.7 Provision of information	5.4.2 Ease of use	References to contact channels are mentioned in
5.11.2.2 (sub clause in Enquiries and complaints)	5.4.3 Awareness	18477, however more detail has been added to the new standard and given a specific section of the standard.
	5.4.4 Telephone services	
	5.4.5 Online services	
	5.5 Consumer information	Presented in a different way but the intention of these points remain the same.
5.7 Provision of information5.8 Promotions and marketing	5.5.1 General	
	5.5.2 Presentation of key information	
 5.9 Sales activities 5.10 Contracts and sales documentation 5.10.1 Responsibilities of sales agents 5.10.2 Contract forms 5.10.3 Right to cancel and acknowledgement of cancellation 	5.6 Sales and contracts	
	5.6.1 Sales code of conduct	Presented in a different way but the intention of these points remain the same.
	5.6.2 Contract terms	

	5.7 Payments and billing	
5.10.4 "Safety net" procedures and acting		Presented in a different way but the intention of these points remain the same.
responsibly to non-payment	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	6 Resources to support service delivery	
5.12 Resources (including training)	6.1 General	
5.12.1 Determine resources needed	6.2 Frontline staff 6.2.1 Resources	This is an enhanced/new clause — it takes the previous clauses and adds a few additional requirements. For
5.4 Planning for inclusive provision of services5.11.2.3	6.2.2 Empowerment	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.
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.

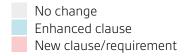
	6.4 Management of consumer vulnerability data	This is an enhanced/new clause — more detail has been
	6.4.1 General	
2.0 Canfidantiality	6.4.2 Data policy	
3.8 Confidentiality5.5.2 Using and managing records	6.4.3 Privacy and security	added to ISO 22458 around data protection. Since BS 18477:2010, GDPR has come into effect.
	6.4.4 Informed consent	
	6.4.5 Internal data sharing	
	6.4.6 External data sharing	
5.5.2.4 third parties	6.5 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.
5.10.4.2 provision of service temporarily suspended	6.6 Interruptions to service	This is an enhanced/new requirement – more detail
	6.6.1 Interruption due to external events	has been added to ISO 22458 around interruption to service (operational problem in BS 18477). There's also much more structure to the clause.
	6.6.2 Interruption to essential services	

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

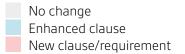
	8 Responding to consumer vulnerability	
	8.1 General	
	8.2 Taking action to improve outcomes for individuals	
	8.2.1 Understanding risks and needs	
	8.2.2 Understanding the individual's relationship with the organisation	This is a new area of the standard with no direct comparison to BS 18477. Elements of this are covered in the training clause 5.12.2, enquiries
	8.2.3 Response options	clause 5.11.2 and safety net 5.10.4.
	8.2.4 Shared decision making	
	8.2.5 Directing to specialist information, advice, and support	
	8.3 Taking action to improve outcomes for others	
	9 Monitoring, evaluation, and improvement	This is only a heading.
 5.11 Customer satisfaction, enquiries, and complaints 5.11.1 Performance indicators of customer satisfaction 6.5 Monitoring 	9.1 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.



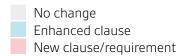
 6 Compliance, evaluation, and improvement 6.1 Commitment 6.2 Responsiveness 6.3 Proactive approach 6.4 Foresight 6.5 Monitoring 6.6 Review of policies and procedures 	9.2 Evaluation	Presented in a different way but the intention of these points remain the same.
6.7 Continual improvement	9.3 Continual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



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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.
3.3 Resources 3.4 Competence	6 Resources to support service delivery 6.1 General 6.2.3 Training in consumer vulnerability	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.
3.5 Transparency	4.2 Principles	4.2 has brought together a few clauses from 18477 and
3.6 Accessibility		added further principles which will be clearly communicated to staff at all levels.

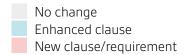


3.7 Communication	5.4 Consumer contact channels 5.4.1 Choice 5.4.2 Ease of use 5.4.3 Awareness 5.4.4 Telephone services 5.4.5 Online services	References to contact channels are mentioned in 18477, however more detail has been added to the new standard and it has been given a specific section of the standard.
3.8 Confidentiality	6.4 Management of consumer vulnerability data 6.4.1 General 6.4.2 Data policy 6.4.3 Privacy and security 6.4.4 Informed consent 6.4.5 Internal data sharing 6.4.6 External data sharing	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
3.10 Awareness		communicated to staff at all levels.
4 Understanding risk factors	7 Identifying consumer vulnerability	This is only a heading.
4.1 Identifying consumer vulnerability	7.1 General	
4.2 Identifying the needs of individual consumers	7.2 Risk factors7.3 Signs of vulnerability7.3.1 General	Presented in a different way but the intention of these points remain the same.
4.3 Dealing with consumer vulnerability	7.3.2 Frontline staff observation 7.4 Encouraging sharing of vulnerability information	

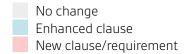


5 Planning, design, and development of inclusive service delivery	5 Inclusive design	
5.1 General	5.1 General	The intention remains the same, these are just
5.2 Review existing service	 5.3 Understanding consumer vulnerability 5.3.1 Consumer insight methodology 5.3.2 Research and mapping 5.3.3 Stakeholder partnerships 5.3.4 User research 	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 Identify areas requiring attention		Objectives are not mentioned in the main section of ISO 22458. This is now in the appendix.
5.4 Planning for inclusive provision of services	5.1 General 6.2.2 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.
5.5 Policies and procedures	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.
5.5.1 General		

5.5.2 Using and Managing Records	 6.4 Management of consumer vulnerability data 6.4.1 General 6.4.2 Data policy 6.4.3 Privacy and security 6.4.4 Informed consent 6.4.5 Internal data sharing 7.5 Recording information about vulnerability 7.5.1 Creating customer records 7.5.2 Referring to customer records 7.5.3 Updating customer records 6.5 Dealing with third-party representatives 	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.
5.6 Billing	5.7.3 Billing	Presented in a different way but the intention of these points remain the same.
5.7 Provision of information	5.4 Consumer contact channels 5.4.1 Choice 5.4.2 Ease of use 5.4.3 Awareness 5.4.4 Telephone services 5.4.5 Online services 5.5 Consumer information 5.5.1 General 5.5.2 Presentation of key information	Presented in a different way but the intention of these points remain the same.
5.8 Promotions and marketing	5.5 Consumer information5.5.1 General5.5.2 Presentation of key information	Presented in a different way but the intention of these points remain the same.



5.9 Sales activities	5.6 Sales and contracts 5.6.1 Sales code of conduct 5.6.2 Contract terms	Presented in a different way but the intention of these points remain the same.
5.10 Contracts and sales documentation		
5.10.1 Responsibilities of sales agents		
5.10.2 Contract forms		
5.10.3 Right to cancel and acknowledgement of cancellation		
5.10.4 "Safety net" procedures and acting responsibly to non-payment	 5.7 Payments and billing 5.7.1 Choice and flexibility of payments 5.7.2 Acting responsibly to non-payment 6.6 Interruptions to service 6.6.1 Interruption due to external events 6.6.2 Interruption to essential services 	Presented in a different way but the intention of these points remain the same.
5.11 Customer satisfaction, enquiries, and complaints	9.1 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.
5.11.1 Performance indicators of customer satisfaction		
5.11.2 Enquiries and complaints	5.4 Consumer contact channels 5.4.1 Choice 5.4.2 Ease of use 5.4.3 Awareness 5.4.4 Telephone services 5.4.5 Online services 5.8 Complaints and disputes 6.2.2 Empowerment	Presented in a different way but the intention of these points remain the same.



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	
6 Compliance, evaluation, and improvement		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.

New clauses – no direct clause in BS 18477		
	4.3 Strategy	
	4.3.1 Outcomes focused	
	4.3.2 Responsibility	
	4.3.3 Proactive needs-based approach	
	5.2 Touchpoints	
	6.3 Artificial intelligence (AI) systems	
	7.3.3 Automated flags	
	8 Responding to consumer vulnerability	
	8.1 General	
	8.2 Taking action to improve outcomes for individuals	
	8.2.1 Understanding risks and needs	
	8.2.2 Understanding the individual's relationship with the organisation	
	8.2.3 Response options	
	8.2.4 Shared decision making	

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