



● BSI Inclusive Service Kitemark™ for Financial Services

Client guide to assessment and testing of the system



● Exclusive to BSI

BSI Kitemark has been tailored specifically to demonstrate best practice for financial services. This includes alignment with the FG21/1 Guidance for firms for their fair treatment of vulnerable customers.

This guide provides you with the information, specification and requirements you need to meet to achieve BSI Kitemark certification.

If you have any questions, please get in touch with one of our advisors who will be able to provide expert information:

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Email: **kitemark@bsigroup.com**

Visit: **bsigroup.com/inclusive-service-uk**



● How to achieve a BSI Kitemark for Inclusive Service Financial Services

The Inclusive Service Kitemark certification is based on compliance with an International Standard and test measures relevant to the sector.

There are three main parts the BSI Kitemark assessment:

1

This Kitemark scheme is based on ISO 22458:2022. This International Standard specifies requirements and guidelines for organizations on how to design and deliver fair, flexible and inclusive services that will increase positive outcomes for consumers in vulnerable situations and minimize the risk of consumer harm. It covers organizational culture and strategy, inclusive design and how to identify and respond to consumer vulnerability.

2

Testing your process – we'll test your system and review evidence to determine the effectiveness of your processes against test measures developed through best practice guidelines including the requirements outlined by the Financial Conduct Authority.

3

Ongoing assessment – Once you have successfully achieved the Kitemark we will continually assess successfully and test your organization to confirm your ongoing compliance with the scheme.

Please read on for detailed explanations of the process. →

● Consumer vulnerability

Requirements and guidelines for the design and delivery of inclusive service ISO 22458:2022

The Organization must demonstrate an effective system is in place, meeting all requirements and guidelines of the International standard.

The following points are guidelines, the full requirements are specified in the clauses of BS ISO 22458:2022

Activity	Further Detail
Organizational Commitment – Principles & strategy	The organization shall demonstrate a clear commitment to improving outcomes for consumers in vulnerable situations and minimizing the risk of consumer harm by following the principles detailed in 4.2. This commitment shall be led by top management and embedded across the organization through ongoing engagement and communication with staff.
Inclusive design	As anyone can be vulnerable at any time, inclusive design is vital to help organizations plan for vulnerability and to ensure that services, service-related products, processes and procedures reduce barriers and problems, rather than create them.
Resources to support delivery	The organization shall ensure that it has sufficient resources in place to deliver an inclusive service.
Identifying Consumer Vulnerability	Vulnerability is not always obvious. Many people do not think of themselves as vulnerable. They might be unwilling to share personal information or might not think it is relevant.
Responding to Consumer Vulnerability	The organization shall provide frontline staff with necessary resources and support to enable them to: <ul style="list-style-type: none"> a) think creatively and innovatively about potential response options; b) be flexible in their response and tailor options to meet individual needs; c) improve outcomes and minimize harm for the individual, now and in the future; d) improve outcomes and minimize harm for others using the service.
Monitoring Evaluation & improvement	The organization shall have systems in place to monitor the effectiveness of its service provision in delivering positive outcomes for consumers in vulnerable situations.

● Measures for Testing

The Organization must meet or exceed the test measures below which have been created based on best practice guidance for consumer vulnerability including meeting or exceeding the requirements of the Financial Conduct Authority (FCA) FG21-1 Guidance for firms for their fair treatment of vulnerable customers.

Area	Kitemark requirement	Test method
Competence	Organisations shall have in place methods to ensure their front-line staff are competent to identify and support vulnerable customers. Note: Examples include but are not limited to; The training and assessment being one programme delivered to all staff or one core programme delivered to front line staff with specialised dedicated training to specialist groups who are escalated to or calls are funnelled to (such as Priority service register) as the organization deems appropriate.	All staff in frontline roles to be provided initial training in helping vulnerable customers with an ongoing training plan. Competency effectiveness to be conducted to ensure the effectiveness of training every 3 months via all channels. Including but not limited to; <ul style="list-style-type: none"> ● Identification of vulnerability risks ● Resolution at FPOC of dissatisfaction ● Escalation to a complaint where appropriate.
	Offering practical and emotional support to frontline staff dealing with customers in vulnerable situations.	Evidence that an organization has in place practical measures to support employees where appropriate. Examples may include time out for challenging calls, opportunities for staff to share/discuss their experiences, have in place mental health first aiders or employee assistance services. Some organizations may already have in place other standards such as BS ISO 45003:2021, which would be accepted as evidence this was met.
	Teams handling vulnerable customers should be free from targets relating to call handling time (if applicable).	Confirmation of no target in place. Evidenced through review of contact centre.
Vulnerable consumer – Contact	A range of support services and 3rd party representation should be available to provide to vulnerable customers if required.	Evidenced through call centre procedures, call listening, and frontline staff interviews.

● Measures for Testing

Area	Kitemark requirement	Test method
Vulnerable consumer – Contact	Proactively spot unusual – and damaging - behaviour that isn't fraud, in particular patterns of behaviour that predate serious financial problems.	Evidenced through assessment of products/tools or services offered to customers.
	<p>Providers shall offer to record their customer's channel of choice for communication so that they can take this into account when they need to get in touch, if the circumstance allows. When circumstances change this shall be reviewed.</p> <p>Note: For some scenarios (such as fraudulent activity on an account or a power cut it may not be possible to use the channel of choice). Channel of choice should be used where it is possible.</p> <p>Frontline staff shall be able to provide information to customers using a variety of channels which suit the customers' needs once they have been determined. This shall include being able to offer information in writing if the need has been determined or the customer has requested it (this can be templated or written).</p>	<p>Evidenced through call centre procedures, call listening, and frontline staff interviews.</p> <p>Evidenced through call centre procedures, call listening, and frontline staff interviews.</p>
Customer Feedback & complaint resolution	<p>Compliance with FCA (FCA Handbook DISP 1 – 1.6 Complaints time limit rules).</p> <p>Complaints shall be addressed in a timely manner.</p>	<p>Assessor to sample evidence of;</p> <ul style="list-style-type: none"> ● Compliance with internal complaint policy. ● Written acknowledgement of receipt of complaint. ● Evidence of the complainant is kept informed thereafter of the progress of the measures being taken for the complaint's resolution. ● Final or other response to complainant in writing within 8 weeks. ● EMD (Electronic money) & PSD (Payment services) complaints – final response within 35 working days.

● Measures for Testing

Area	Kitemark requirement	Test method
Accessibility	The organisations digital services shall be subject to a digital accessibility assessment compliant with Web Content Accessibility Guidelines (known as WCAG) WCAG 2.1 Guidelines and demonstrate they are working towards meeting AA standard.	Organizations shall evidence they have used software to assess their web content against AA standard and all identified accessibility issues shall be actioned or an improvement action plan in place.
	Access to vulnerable services through an organisation's website.	Shall be no more than 3 clicks.
Payment & Account control	Flexible payment options shall be available to vulnerable customers if appropriate, such as their vulnerability putting them at financial difficulty. Note: examples could include an illness which stops them working or a life event which is impacting them financially.	Flexible payment terms shall be available if appropriate and with customers full understanding and agreement
	If debts are sold on, or collection outsourced, the organization shall only use companies whose staff have some form of vulnerability training.	All staff to receive vulnerability training and the effectiveness to be monitored. Training as a minimum shall cover the requirements of ISO 22458:2022 Clause 6.2.3.1.
	All banks and current account providers should offer customers the right to opt out of marketing of credit and to cancel their overdraft without moving to a basic account. People should also be provided with access to create a Notice of correction or power of attorney as appropriate to support the future management of access to services.	Evidenced through assessment of products/ tools & services offered to customers.

● Measures for Testing

Area	Kitemark requirement	Test method
Management Information	<p>Produce Management Information to monitor and evaluate the effectiveness of the outcomes delivered to vulnerable consumers.</p> <p>The organization shall;</p> <ul style="list-style-type: none"> ● Define clear MI targets appropriate to their organization. ● Demonstrate resource. <p>On a Monthly basis;</p> <ul style="list-style-type: none"> ● Publish to Top Management MI, ensure its understood and reviewed. ● Robustly challenge anomalous or unexpected results. ● Analyse the data and monitor conclusions – the right messages and conclusions were drawn from the data. ● Acted on– where appropriate, actions were taken to remedy the situation, to investigate further and to follow up on those actions, providing resources to resolve as required. ● Maintain records of review and actions to monitor the effectiveness of actions taken. <p>The data collected shall be validated for accuracy via Internal audit or sampling minimum of once per year, or when new processes or products are introduced (whichever is sooner).</p>	<p>Review of records of Monthly review of MI:</p> <ul style="list-style-type: none"> ● The data within the MI shall be independently validated by the assessor through assessment sampling. ● Independent analysis by the assessor of the MI results to identify any unexpected trends and review corrective action. ● Assessor to review evidence of the organizations review of Customer feedback: using formal and informal feedback from vulnerable customers to identify trends and areas for improvement. ● Numbers of complaints: trends in numbers of complaints involving vulnerable customers in comparison to other customers. ● Complaint root cause analysis: investigating vulnerable customer complaints fully to understand the cause of customer complaints, not just dealing with the symptoms. ● Review evidence of call data including Call answering times and abandoned calls and evidence of actions if trends are underperforming.

● The scale of vulnerability

14.1 million

UK residents have a **disability**



Dementia affects almost



1 million

people in the UK

1 in 6 adults

Experience common **mental health** problems every week



23%

of us suffer **anxiety** when dealing with service providers

2.5 million

People in the UK are living with **cancer**



310 people

Declared **bankrupt** or insolvent per day Feb-Ape 2021



The FCA Annual report included a Post-Covid vulnerability snapshot

27.7 million adults across the UK showed one or more characteristics of **vulnerability**.

An increase of **15%**



● Why BSI?

BSI is the business improvement company that enables organizations to turn standards of best practice into habits of excellence.

For over a century BSI has championed what good looks like and driven best practice in organizations around the world. Working with over 86,000 clients across 193 countries, it is a truly international business with skills and experience across a number of sectors including automotive, aerospace, built environment, food, and healthcare. Through its expertise in Standards Development and Knowledge Solutions, Assurance and Professional Services, BSI improves business performance to help clients grow sustainably, manage risk and ultimately be more resilient.

bsi.

“The BSI Kitemark is a highly recognized mark which consumers can trust. In fact, 70% of British consumers emphasize that they feel more confident when buying a product or service if it displays the BSI Kitemark.”

Natasha Bambridge, Global Director
Consumer Promise Practice, BSI



By Royal Charter



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