

# Vulnerability Policy / Training

## Vulnerability Policy / Training

### Identifying & Training

Training is provided to all staff both internally and externally on the important issue of dealing with debtors who may be Vulnerable.

A 'Vulnerable Person' is anyone who needs:

Community care services because of mental or physical disability, age or illness.

Is unable to take care of himself or herself; or

Is unable to protect themselves against significant harm or exploitation.

And potentially part of the following Groups:

Disabled

Elderly

Seriously ill

Mentally ill

Single parents

*(the above is not an exhaustive list)*

Each member of staff goes through a Course for Safeguarding Vulnerable adults. The course covers all areas that are required to identify where possible vulnerability. Each member of staff isn't just trained on this area but also has to take a written multiple-choice examination to be awarded a certification of training and understanding.

The examination and certification is provided by an external organisation to ensure the highest of standards in this area, Utilising a specialist in this field provides the assurance that our staff have the best possible training to help anyone who is possibly in the category of vulnerable.

We pride ourselves in always safeguarding vulnerability in all our operations and have done so since our conception. We understand it is a very delicate issue and not always easily identifiable so our staff are highly trained to identify debtors who may fall into this category.

Our internal training programme for adult safeguarding follows the government's policy, however it focuses on the job we have to do and what stages we can identify a person who is vulnerable.

We also fully understand that people who are ill, in debt or are permanently on medication do not always fall under the category of vulnerable. Each case therefore if raised is looked into carefully with managerial involvement.

Refresher training is undertaken with both Head Office staff and at Enforcement Agent meetings. Any cases encountered are talked through as part of our practical training policy (*excluding data that is protected under data protection*).

Linked to our vulnerable adult policy we provide our staff with additional training on identifying child protection issues, human trafficking, animal cruelty and illegal substances as it fits with our Enforcement Agents attending people's property.

## Dealing with Vulnerable Debtors

If a debtor is noted and recorded by ourselves as a vulnerable person this data is shared immediately with the local authority together with any evidence gained.

We may then discuss the case with the Local Authority in order to decide what action should be taken and how we proceed.

With regard to dealing with the vulnerable person to collect payment we could offer, subject to the Local Authorities approval, the following options:

Instant access to our welfare team for support and advice.

A meeting at the Local Authority or Penham Excel's Offices between the vulnerable debtor, the Local Authority and us to discuss the situation in a comfortable stress free surrounding.

A conference call between the Local Authority, the vulnerable debtor and our welfare team to discuss the situation.

Issue a different type of letter clearly explaining the situation.

Take the collection stage back a stage (remove the enforcement fee).

Cease all enforcement action.

Offer to deal with a family member, close friend or representative from a Debt Advisory Service subject to authority from the Local Authority in order to not break any data protection.

Since the changes in the regulations in April 2014 an emphasis has been made on Vulnerability, and ensuring adequate training and identification takes place. However this is not a change to Penham Excel and its staff; we have always encountered people throughout our work as enforcement agents who are vulnerable. We have always dealt with any case carefully and discussed them with our clients.

Identifying Vulnerability is key part of the training all our staff go through, asking tactful questions to obtain the needed evidence to support that person(s) with the enforcement process. Looking for traits that (*potentially*) point to vulnerability, such as:

A change of telephone conversation email or letter

Behavior of a person

Language difficulties

Paperwork evidence

History / family background

Information gathered by others / the instructing client

## Language

Dealing with Debtors who may not speak English can also be deemed as being Vulnerable. At Penham Excel we ensure every effort is made to communicate with all of the debtors, including those who may not be able to speak or understand English written content. To this end we ensure the following practices are in place:

## Letters

With the issue of our Notice of Enforcement will also send out a debt advice leaflet, talking through the process of enforcement, providing the advice agencies that can be visited / talked to and also flags for languages to try and assist with identifying language barriers.

To translate this letter to your language please visit Google Translate here: [www.translate.google.co.uk](http://www.translate.google.co.uk) and type in the contents.

Our system can also flag different languages per case and can then translate any letters produced into that language for posting out and door step attendances. In our offices we use Babylon Translator – This covers 77 different languages – This software does not just translate word for word which can then be deemed unreadable. This software contextually translates and to a very high level of accuracy. We also use type talk which again translates over 200 language but which also uses accents to help further with understanding.

## Website

Our website [www.penhamexcel.co.uk](http://www.penhamexcel.co.uk) displays a visible panel on the home page of nationalities flags which links through to a page on the Debtor Information page which directs the debtor in their own language to Google Translate.

We are also currently working with a company to have the web site translated (*only the debtor information part*) into a talking site varied in a number of different languages – this is in progress and will be live and tested by the middle of 2019.

## Enforcement Agents

All of our Enforcement Agents carry Language Line cards with them. If a debtor does not understand English our agents will show them the card and ask to point to the language they understand. At this point the agent will contact Language Line by telephone and request an Interpreter who will then speak to the debtor and explain why the agent is there and what the debtor must do or agree to.

The agents' handheld devices (*IPADs*) have the letters in a variety of different languages to help alongside the Language Line person who would be assisting. The data is removed with regards to figures but the wording is translated. These letters can be emailed to the helpline person upon acceptance by the debtor. Additionally the EA's can use Google translate and Google documents translate on their IPADs.

All agents have Voice Translate Pro as an application that translates the spoken voice of the agent to the language required. This is one of three applications operated by our enforcement agents that does not just translate into text but also with the required accents.

## How we make a difference:

If vulnerability is identified we can:

Take the enforcement back a stage

Remove fees where applicable

Advise the local advice agencies and client of the situation to gain help

Provide a free of charge welfare visit to assist with understanding and provide support

Ensure they are getting the correct support and financial benefits they should be

Attending Citizens Advice and all advice sector meetings to work with them on the latest understanding of vulnerability and how to deal with it

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