

## PSA's work programme for its review of vulnerability

Last year the PSA commenced a review of its approach to vulnerability. A review was necessary because:

- we want to ensure that our approach to vulnerability supports us to deliver on our new [strategic purpose](#)
- we need to consider the impact of market changes, particularly given that our current approach and guidance has been in place since 2015/16
- our review of our Code of Practice provides an opportunity for us to ensure that we have clear standards and expectations to ensure any specific needs of consumers who may be vulnerable or at risk are able to be met
- it is in the interests of consumers, industry and the reputation and longevity of the market, that we ensure that all consumers, including those who may be vulnerable, can use phone-paid services with confidence
- there are a range of other work-streams set out in our [Business Plan](#) for 2020/21 that focus on improving the consumer experience of services and it is critical that these work-streams are well aligned. For example, our review of our approach to consumer education.

As part of our review we commissioned a report looking at best practice across other regulators, our current approach, and what we could or should do differently. Following that report we have developed a work programme setting out the work we intend to take forward, which is summarised below.

### Summary of our vulnerability work programme

As part of our Code 15 work, we will be:

- considering best practice, as set out in the report, and whether new regulatory requirements are needed to support us to develop proposals for regulatory requirements related to vulnerability (including in relation to customer care and refunds)
- developing policy options for better information sharing between us and the value chain to give us a clear and early understanding of market and consumer issues and risks
- considering how our Code 15 proposals can incentivise providers and give us good knowledge of what's happening across the phone-paid services industry to protect vulnerable or at-risk consumers and prevent harm before it occurs.

We aim to consult on draft Code 15 proposals in early 2021.

Outside of the Code 15 project we also intend to:

- review the effectiveness of our own processes and procedures in identifying and responding to consumers who may be vulnerable or at risk. This includes how we communicate with consumers who contact us
- seek opportunities to work with government and other regulators who may have more reach than us, to share information about phone-paid services and how they work
- work with industry to promote best practice.