



ADVISORY GUIDELINES ISSUED BY

THE INFO-COMMUNICATIONS MEDIA DEVELOPMENT AUTHORITY

ON

PROTECTION OF VULNERABLE CONSUMERS

WHO APPROACH TELECOMMUNICATION OPERATORS TO SIGN UP FOR TELECOMMUNICATION SERVICES

9 JANUARY 2024

1. INTRODUCTION

- 1.1. Telecommunication operators are required to protect the interest of consumers when they use telecommunication services. This includes taking measures such as verifying the subscribers' identity when they subscribe for telecommunication services, by checking against the relevant Identification Document ("ID") produced during registration, so as to ensure that there are no fraudulent registrations.
- 1.2. In view of scam incidents involving persons with intellectual disability being tricked into signing up for telecommunication services and saddled with unpaid bills, IMDA is of the view that these existing measures need to be enhanced, in order to give persons with intellectual disability better protection. This is to ensure such individuals are less likely to be tricked into registering for telecommunication service plans at shopfronts of both telecommunication operators and their associated retailers.
- 1.3. In consultation with the Ministry of Social and Family Development ("MSF"), social service agencies ("SSAs")¹ and the telecommunication operators, IMDA hereby issues this set of advisory guidelines for telecommunication operators to observe, in order to better protect vulnerable persons from being taken advantage of to subscribe for services that could be used by third parties for scams and other criminal activities. We are particularly concerned about persons who may have cognitive difficulty in making decisions on their own or comprehending the consequences of their actions, e.g., persons with intellectual disability ("**Vulnerable Consumers**"). To be clear, Vulnerable Consumers do not include persons who cannot communicate easily because of their disability (e.g., deaf persons, persons with physical disabilities), or elderly persons who lack familiarity with the English language or technology.
- 1.4. These guidelines will assist telecommunication operators and their retailers/agents during face-to-face/over the counter registrations, to better detect Vulnerable Consumers and improve frontline staff's handling of cases where Vulnerable Consumers appear to be exploited by other persons ("**Suspicious Cases**").

2. MEASURES TO DETECT AND ASSIST VULNERABLE CONSUMERS

- 2.1. Telecommunication operators' frontline service staff could look out for Vulnerable Consumers by using the following checklist as a guide.
- 2.2. A customer is likely to be a Vulnerable Consumer if he/she:
 - (a) Holds Specific Physical Identification Document

¹ These SSAs include the Movement for the Intellectually Disabled of Singapore (MINDS) and Association for Persons with Special Needs (APSN).

- (i) Customer displays/holds ID(s) that suggests or indicates his/her **cognitive** disability², and/or contains contact details of his family member, guardian or caregiver. Examples include Transitlink Persons with Disabilities Concession Card, Developmental Disability Registry Card.
- (b) Exhibits Communication Difficulties
- (i) Customer is unable to remember his/her basic personal details (e.g., address).
 - (ii) Customer is unable to provide his/her basic personal details with ease.
 - (iii) Customer exhibits repetitive speech or inability to maintain conversation (including understanding the questions asked, providing answers to questions asked or repeat the information provided to him/her), eye contact or other social norms.³
 - (iv) Customer is disoriented with dates and times.
- (c) Unable to Recollect Existing Subscriptions
- (i) Customer cannot recall application(s) for service(s) with telecommunication operator recently.
 - (ii) Customer cannot remember details/information on his/her existing subscription with telecommunication operator.
 - (iii) Customer is unable to provide details of existing subscription (e.g., existing number, last payment of bill, when he/she first subscribe to service from the telecommunication operator, etc.) with ease.
- (d) Subject to undue influence by a third party (if applicable)
- (i) Customer left the talking mostly to the accompanying party.⁴
 - (ii) Customer looks at the accompanying party before replying to any questions or instructions.
 - (iii) Customer does not pay attention to any questions asked and simply follows the instructions of the accompanying party.

2.3. Following detection of any of the above “red flags”, telecommunication operator’s frontline service staff should consider these as “Potentially Suspicious Cases” and step-up vigilance in handling such cases. This can be done by establishing the reasons for signing up for telecommunication service(s) and verifying whether the customer really requires the service(s).

² Cognitive disability alone does not necessarily indicate a person is a Vulnerable Consumer. Operators should go through the other items on this checklist to determine if the person is a Vulnerable Consumer.

³ Telecommunication operators should also note that there could be persons with disabilities who cannot communicate easily not because of any cognitive issues, but because of other aspects of their disability (e.g., deaf persons, persons with physical disabilities and respiratory issues may speak more softly).

⁴ Telecommunication operators should also note that there could be elderly persons who, when making purchasing decisions, rely on family members or other persons for assistance, due to the lack of familiarity with the English language or technology.

2.4. When handling Potentially Suspicious Cases, the telecommunication operator's frontline service staff could:

(a) Establish whether the Vulnerable Consumer has valid reasons for new telecommunication service(s) by conducting checks (e.g., check with customer and/or back-end systems)

- (i) Ascertain whether the Vulnerable Consumer had already completed one or more service sign-ups, within a short span of time, and/or at the same retail shop or with the Operator.
- (ii) Ascertain whether one or more of the service sign-ups involved subsidised handsets.
- (iii) Ascertain whether the Vulnerable Consumer would reach the prescribed limit for prepaid and/or postpaid mobile service with the latest service sign-up(s).

(b) Confirm with family member, guardian or caregiver of Vulnerable Consumer that Vulnerable Consumer requires new service(s)

- (i) If the Vulnerable Consumer is unaccompanied, obtain consent from the Vulnerable Consumer to the extent possible to contact his/her family member, guardian or caregiver to confirm that the Vulnerable Consumer requires the service(s). This is provided that the Vulnerable Consumer is able to provide the contact details of one of these persons or is holding documents with such information.
- (ii) If the Vulnerable Consumer is accompanied, check with the accompanying party (if it can be established that he/she is a family member, guardian or caregiver to the Vulnerable Consumer) and confirm that the latter requires the service(s). If the accompanying party is not a family member, guardian or caregiver⁵, and confirmation for the service cannot be reasonably obtained, the frontline service staff may raise alert as set out in Section C below.

(c) Escalate suspicious cases

- (i) Alert a supervisor or manager-in-charge immediately of Potentially Suspicious Cases, if the Vulnerable Consumer does not appear to give a coherent response or reason for signing-up for service(s) and confirmation from his/her family member, guardian or caregiver cannot be obtained.
- (ii) Explain to the Vulnerable Consumer that a supervisor or manager-in-charge will need to review his/her application for the telecommunication service(s) before it can be processed further.

⁵ Telecommunication operators may rely on documentation such as IDs and/or court documents to establish the relationship between the Vulnerable Consumer and the accompanying party.

- 2.5. Telecommunication operators should only complete the registration for Vulnerable Consumers if telecommunication operators are fully satisfied that the registration is bona fide.

3. POST-REGISTRATION MEASURES

- 3.1. In the event that a Vulnerable Consumer approaches the telecommunication operator to claim that he/she was tricked into registering for telecommunication services, and request for a waiver of payments due, IMDA notes that such requests will be a commercial decision to be taken by telecommunication operators. Notwithstanding this, IMDA strongly encourages telecommunication operators to consider suspending or waiving any collection of monies from these Vulnerable Consumers, especially if the telecommunication operators could have, on their part, helped to prevent the registration by performing the necessary due diligence checks at the point of service registration, and/or it can be established by the relevant telecommunication operator(s) and/or law enforcement agencies (so far as is reasonably practicable) that the Vulnerable Consumers are victims of scams.

4. CONCLUSION

- 4.1. Scams affect the interest of all consumers, especially Vulnerable Consumers. While these guidelines serve as the first step in protecting Vulnerable Consumers from scams, success in protecting Vulnerable Consumers will depend on the collective action and cooperation from all stakeholders, including telecommunication operators.