Are Vulnerable Customers Being Left Behind by Voice Mechanisms Embedded in Quality Frameworks?

Patrícia Moura e Sá[1]

Research Centre in Political Science (CICP) & Faculty of Economics - University of Coimbra
Email: *pmourasa@fe.uc.pt*
Corresponding author

Rita Martins

CeBER & Faculty of Economics – University of Coimbra
Email: *rvmartin@fe.uc.pt*

Abstract

Customer voice mechanisms are essential to both quality planning and assessment. However, customers with some characteristics or facing particular circumstances might have difficulties in expressing their views. This paper aims to critically analyse customer voice mechanisms typically associated with quality frameworks in what concerns their ability to capture feedback from vulnerable customers.

The main quality management frameworks are analysed to identify the tools and mechanisms suggested to collect customer input. Then, using the concept of vulnerability suggested in the literature, it is evaluated to what extent such mechanisms are capable of meeting the needs and challenges raised by vulnerability factors.

The analysis conducted suggests that the main quality frameworks tend to implicitly assume the existence of 'an average customer' and underestimate the challenges associated with vulnerable customers. Quality models give considerable freedom for organisations to select the tools and instruments they use to communicate with customers. The research also shows that, regardless of the channel at stake, vulnerable customers tend to be at a disadvantageous position when using such mechanisms. Based on the problems identified, some recommendations on how to improve quality frameworks and tools in what the involvement of vulnerable customers is concerned are derived. Such recommendations can be used for service providers to improve their communication channels.

The issues associated with the existence of vulnerable customers have been somehow absent from the quality debate. This research partially addresses this gap by pointing out some concerns that need to be taken into account when collecting their feedback.

Keywords:

Vulnerable customers, voice, quality assessment, quality models, communication channels, feedback

---

1. Introduction

Different management disciplines (notably, marketing, innovation and quality) converge around the idea that customer feedback is essential to drive improvement in a way that contributes to better meet users' needs and expectations. In this sense, customer empowerment has been on public discourses and agendas for some time, the main argument being that demanding customers contribute to increase the quality of products and services by forcing producers and services providers to be aware of their needs and expectations and to work continuously to meet them. It is relatively consensual that processes of involvement and representation (i.e. the use of voice mechanisms) are essential to ensure that customers' interests are adequately taken into account. However, having empowered consumers capable of making fully informed choices is not easy to achieve.

Customer focus is a key principle of quality management with all major models and frameworks emphasising its importance. As Lagrosen (2001, p. 350) puts it, "TQM texts are full of exhortations about quality for the customers" with customer focus being considered to be "one of the majors, if not the major, building block of TQM". Regardless of the particular definition adopted, customer focus implies listening to customers and offering them alternative forms of service delivery. Having a customer focus requires organisations to involve users in the development, management and operation of services as well as in the assessment of what has been provided and how.

Customer voice can emerge from a range of sources and several tools exist to capture and analyse it. Surveys, complaint and redress systems and participation in user groups and forums are among the most widely used. More recently, co-productive initiatives making use of more interactive and unstructured channels have also emerged. On an assessment perspective, total quality management models heavily rely on such mechanisms to measure customer satisfaction and to identify potential areas of improvement. Equally, on a more quality planning perspective – when designing products, services and processes – involving users from early stages and incorporating their views has been increasingly emphasised.

Yet, research highlights two major problems. The first one is the fact that mechanisms for fostering and capturing user voice are nor fully understood and their potential is often underdeveloped (Simmons and Brennan, 2017). The second, and most important one for our purposes, is the inability of such mechanisms to give 'voice' to the so-called vulnerable customers, whose needs and difficulties are often discarded by service providers. In fact, customers are very diverse in terms of their needs and expectations, but also in what their skills and competences is concerned. Vulnerable customers in particular might have increased difficulties in exercising voice, a core element of quality management.

Based on the identification of the customer voice instruments suggested by the main quality models, the aim of the current paper is thus to analyse their potentialities and pitfalls, particularly with reference to their capacity to capture the views of customers, including those who are vulnerable. From such analysis, some recommendations on how to improve quality frameworks and tools in what the involvement of vulnerable customers is concerned are derived.

The remainder of the paper is structured as follows. Next section briefly reviews the main quality management models in what concerns the tools and mechanisms they propose to collect feedback from customers and users. Then, in the following section, the concept of customer vulnerability is addressed and its implications to quality planning and assessment discussed. Bringing together the points raised in these two sections, the paper then presents a critical

Excellence in Services
21ᵗʰ International Conference
Conference Proceedings ISBN 9788890432781

524

Le Cnam
Paris (France)
30 and 31 August 2018

evaluation of existing customer voice mechanisms. The paper concludes with some recommendations to improve their relevance and effectiveness in capturing the views of vulnerable customers.

2. Review of quality management models and customer voice mechanisms

The involvement of customers might occur at different stages of the service delivery process. Shortly, three main stages can be identified: 1) service design, when the value proposition is identified and the service features are selected; 2) during service provision, when customers necessarily become to a certain extent co-producers and 3) after service delivery, when customers give feedback and take part in assessment processes. At each stage, different approaches and tools can be applied, as depicted in Figure 1.

Figure 1. Service delivery stages and associated customer focus techniques/tools
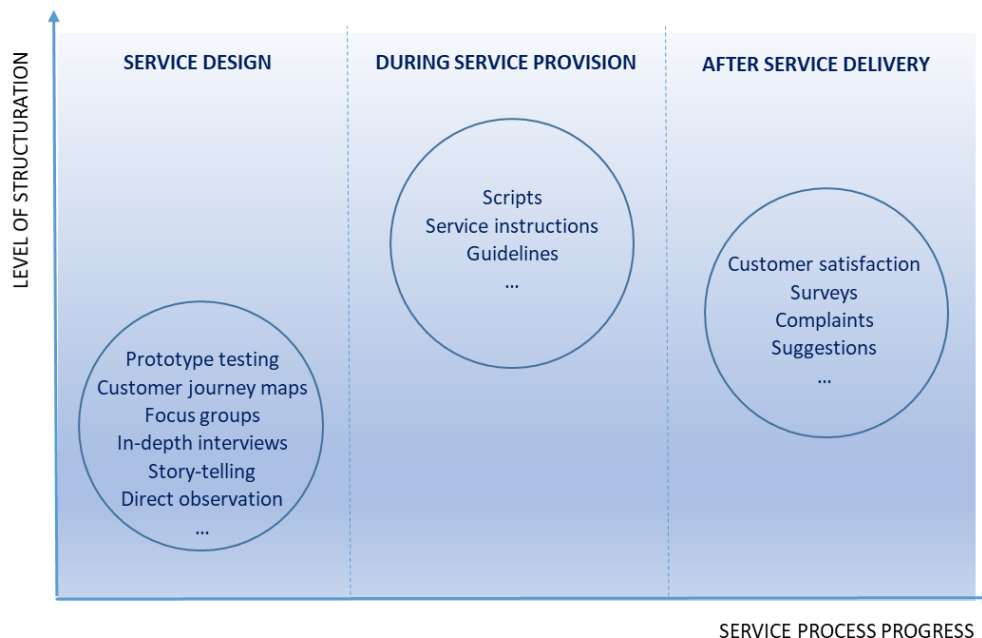
Thus, in practice, customer focus requires organisations to collect customer feedback through a variety of forms, such as surveys, focus groups held with users and their representatives, or even participant observation techniques. Early in the process, in-depth information needs to be collected to foster innovation and creativity. The main priority is to understand problems users might face and how the service is experienced from the customer point of view. In this regard, story-telling, for instance, can be particularly useful: stories put "ideas into context and give them meaning" and narratives can help "create multiple touchpoints" along the user's experiential timeline (Sá, 2018). To better describe the journey of a user to get a particular service, customer journey maps can be used. They are oriented graphs that describe the journey of a user by representing the different touchpoints that characterise his/her interaction with the service (Sá, 2018). Before putting the service into 'full operation', prototype testing is important "to learn about the strengths and weaknesses of the

idea and to identity new directions that further prototypes might take" (Brown, 2008, p. 3). Prototypes facilitate communication by making ideas tangible and should be as simple and inexpensive as possible at early stages. As the process evolves, more structured techniques come into place and the issues of representativeness become more important. Taking into account the role of users as co-producers, techniques to be employed during service provision aim at facilitating their tasks, improving consistency and reducing risk of failure. That is why detailed instructions and procedures, as well as scripts, are quite common. Later in the process, customer surveys can give an overall (and aggregate) picture of the users' level of satisfaction.

Simmons et al. (2011) classify voice mechanisms into three categories: hierarchical, individualistic and group-based. Hierarchical mechanisms relate to forms by which customers contact managers and organisational leaders to express their views. Individualistic mechanisms embrace typical tools that customers use to give feedback, such as complaints and participation in surveys of individual preferences. Group-based mechanisms are becoming more and more popular with the emergence of social networks and mainly correspond to user-forums. Representative bodies are another possible channel to listen to customer needs and expectations. Previous research (e.g. Simmons et al., 2011) suggests that a full range of mechanisms should be made available for customers to use, since that although people tend to prefer one channel for expressing their views switching strategies emerge if they feel frustrated.

In order to analyse the importance given by quality management to customer voice mechanisms three main generic TQM models were considered: the EFQM/BEM, the MBNQA and the ISO 9000: 2015.

As highlighted in Table 1, business excellence models consistently incorporate customer focus as a core principle and consider customer results as a key aspect of organisational performance assessment. The EFQM model, for instance, identifies "adding value for customers" as a fundamental concept, stating that "excellent organisations consistently add value for customers by understanding, anticipating and fulfilling needs, expectations and opportunities" (EFQM, 2013, p. 3). In addition, when assessing organisational results the model adopts "customer results" as one of the criteria, suggesting that "excellent organisations achieve and sustain outstanding results that meet or exceed the need and expectations of their customers" (EFQM, 2013, p. 5). Similarly, the MBNQA framework elects "customer and market focus" as a key criterion for organisational excellence within which assesses "how the organisation builds and maintains strong, lasting relationships with customers" (NIST, 2017). Also, as shown in Table 1, customer focus is one of the principles of ISO 9000 standards (APCER, 2015), which require organisations to implement information systems capable of collecting and processing information with regard to customers (and other stakeholders) and regularly measuring their levels of satisfaction.

Table I. Presence of customer voice mechanisms in quality management models

	European Foundation for Excellence Model (EFQM/BEM)	Malcolm Baldrige National Quality Award (MBNQA)	ISO 9001:2015 standards
Customer focus principle	Adding value for customers (the main aim of excellent organisations is to consistently add value for customers by understanding, anticipating and fulfilling needs, expectations and opportunities)	Customer-focused excellence (customers are the ultimate judges of organisational performance and product/service quality)	Customer focus (the primary focus of quality management is to meet customer requirements and to strive to exceed customer expectations)
Sub criteria/ Requisites particularly related to customer focus	1. Leadership (1c. Leaders engage with customers, partners and representatives of society) 2. Strategy (2a. Strategy is based on understanding the needs and expectations of both stakeholders and the external environment) 5. Processes, Products & Services (5b. Products and Services are developed to create optimum value for customers; 5e. Customer relationships are managed and enhanced 6. Customer results	1. Leadership (1.1. Senior Leadership – Communication and engagement with key customers) 3. Customers 3.1. Voice of the Customer (listening to, interacting with and observing customers to obtain actionable information; determining and measuring customer satisfaction, dissatisfaction and engagement) 3.2. Customer Engagement (building and managing customer relationships; managing customer complaints) 4. Measurement, Analysis, and Knowledge Management 4.1. Measurement, Analysis, and Improvement of Organizational Performance (selection of voice-of-customer and market data and information) 7. Results 7.2. Customer focused results (Customer satisfaction and dissatisfaction results; Customer engagement results – current levels and trends in key measures or indicators)	4.2. Understanding the needs and expectations of interested parties 5.1.2. Leadership and Commitment – Customer focus 7.4. Communication 8.2. Determination of requirements for products and services (8.2.1. Customer communication) 8.3. Design and development of product and services (8.3.2. Design and development planning – the organization shall consider the need for involvement of customer and user groups in the design and development process) 9.1. Monitoring, measurement, analysis and evaluation (9.1.2. Customer satisfaction – The organization shall monitor customer perceptions of the degree to which requirements have been met; The organization shall obtain information relating to customer views and opinions of the organization and its products and services)
Suggested customer voice mechanisms	Surveys, Focus Groups, Scenario Creations, Benchmarking and SWOT analysis; Complaints monitoring	No indication of particular tools (although processes for capturing customer-related information must exist)	Complaints handling processes are required. Other sources of customer information are proposed: focus groups, surveys of product users, warranty information, customer satisfaction studies, reports from customer organisations, industry group information, benchmarking data

Excellence in Services
21th International Conference
Conference Proceedings ISBN 9788890432781

527

Le Cnam
Paris (France)
30 and 31 August 2018

Looking in particular at the customer voice mechanisms proposed it is possible to conclude that a high degree of freedom is given to organisations. In fact, each organisation is expected to implement the tools and mechanisms most adequate to comply with the requirements set by the quality models adopted. Customer voice mechanisms are not specified. However, whereas in the EFQM case concrete references are made to some tools (not in the criteria themselves, but rather in associated official supporting materials), in the MBNQA case there is only a broad reference to the "voice of the customer" concept. In fact, the MBNQA simply states that organisations must have "processes for capturing and customer-related information" (NIST, 2017, p. 18). ISO standards on the other hand require organisations to have processes to ensure that customer requirements are determined, understood and consistently met, but give them freedom to decide how to get information from customers.

When it comes to demonstrating that the organisation achieves and sustains "outstanding results that meet or exceed the needs and expectations of its customers", for the EFQM model each organisation is free to make use of different tools. The same applies to the way strategy is driven by customer needs and expectations. As the EFQM puts it, once the main stakeholders have been identified, each organisation needs to put in place the "mechanisms and processes that will allow the identification of their current and future needs and expectations" (EFQM, 2018). The European Foundation goes on saying that, for that purpose, "there is a range of tools and techniques that an organisation can use (…) for example: Surveys, Focus Groups, Scenario Creations, Benchmarking and SWOT analysis" (EFQM, 2018). Despite this open understanding of what can be used, The EFQM Model in Action material provides a Customer Results Assessment Sheet that asks organisations to assess to what extent they are holding customer surveys and monitoring complaints and suggestions from customers. The instrument drives organisations attention to the need of comparing customer results over time and with benchmarks. The key point is to use customer results "as the basis for reviewing strategy, improving processes and producing new products and services" (EFQM, 2018).

In the ISO 9000 standards case, as stressed in Table 1, there are key activities an organisation needs to understand and implement that are related to customer focus and customer satisfaction in several clauses. Clause 4.2. ("Understanding the needs and expectations of interested parties") requires organisations not only to determine the parties that have an interest in their activities, but also to monitor and review information about such interested parties and their relevant requirements. Clause 5.1.2. establishes that top managers are responsible for maintaining customer focus. ISO standards, in Clause 7.4., also require organisations to communicate with customers on a regular basis, although they do not establishes which forms and mechanisms need to be adopted. However, ISO standards call for documenting (and recording) the processes organisations use for identification of customer requirements (Clause 8.2.1). Three specific types of communication with customers need to be considered: product and service information; documented agreements (e.g. contracts) and customer feedback (including complaints). There is flexibility for organisations to decide what methods to use to get customer feedback, but methods must be planned, established and evaluated. Several examples are given, including customer surveys, warranty information, reports from customer organisations and distributors. Customer satisfaction monitoring is mandatory (Clause 9.1.2). Such information should be used as input to management review.

3. Challenges raised by customer vulnerability

There is a high consensus in the literature (and among policy makers) that not all customers have identical power to influence service delivery. However, the issue tends to be ignored when it comes to operationalising the customer focus principle. Potential differences are blurred under the "average customer" concept.

The concept of the 'average consumer' was introduced in 1988 in the EU Court's jurisprudence as "an average consumer who is reasonably well-informed and reasonably observant and circumspect" (Davis, 2009, p. 248). At the same time, the Court has recognised the existence of other categories, namely one that corresponds to those who are behind with their education, making them particularly vulnerable, and another formed by those who "are sufficient robust and well-informed to take care of themselves in the market place" (Davis, 2009, p. 248).

The literature on consumer vulnerability understands vulnerability as "an increased probability of making unfortunate consumer choices (…) seen from the individual's consumer's interest" (Berg, 2015, p. 284) and regards it as a potential consequence of both structural factors and temporary conditions (Hogg et al., 2007). Vulnerability is thus associated with the concept of risk (of harm, injury, or loss), which increases with some factors (see Table 2). Structural factors mainly cover income and education issues (Jilke, 2015), while temporary conditions tend to be associated with traumatic events or particularly adverse circumstances (diseases, stress, etc.).

Table 2. Examples of vulnerability factors

Structural factors	Temporary conditions
- Mental or physical disability - Race and gender (at least to a certain degree in many societies) - Educational attainment - Geographical location (remoteness from urban-based services) - Social isolation	- Serious acute illness - Anxiety associated with post-traumatic events (e.g. death of an immediate family member) - Labour force status (temporary unemployment)

Some researchers also call attention to the importance of considering factors that go beyond individuals' attributes and circumstances, pointing out that vulnerability may also "arise from the characteristics of the market for a particular product, the product's qualities or the nature of the transaction" (Consumer Affairs Vitoria, 2004). A typical example of this occurs when 'not vulnerable' consumers acquire complex medical or legal services. In this latter sense, issues of bargaining power and information asymmetries cannot be ignored. The interplay between individual and market factors is manifest. Suppliers with (excessive) bargaining power will feel more at ease to exclude certain customers from access to supply or to provide them with information that is poorer than that provided to other customers due to suppliers' perceptions of such customers' capacities or circumstances, thus accentuating vulnerability of those who are discriminated.

The vulnerability concept itself is necessarily dynamic: not only people's circumstances vary over time, but also because standards of living change in a particular society making what was not regarded by an earlier generation as 'vulnerability' becoming nowadays an important disadvantageous condition. This clearly applies to access to some technologies.

Due to their individual characteristics, vulnerable customers often are not aware of their entitlements and do not feel comfortable in exercising voice. Educational attainment in particular is very much linked to cognitive abilities to acquire information and interpret it. Therefore, this kind of vulnerability has a potentially strong impact on customer empowerment.

The issues raised by vulnerability in what concerns information access and processing are acknowledged in some reports (FCA, 2015; Consumer Affairs Vitoria, 2004). The Consumer Affairs Vitoria discussion paper, published in 2004, identifies the following issues (Consumer Affairs Vitoria, 2004, p. 9):

a) ability to access information about
   - a product's capacity to satisfy his or her needs, its
   - quality and price,
   - prices charged by alternative suppliers, and
   - potential substitute products and their prices;
b) inclination to seek information relevant to the purchase decision and to persist where it is insufficient or not initially forthcoming;
c) capacity to understand the information provided by a supplier or suppliers and to recognise deficiencies such as likely omissions, exaggerations or deceptions;
d) ability to search for information provided by third parties, meet any associated search costs incurred and understand the information provided;
e) inclination to complain or seek redress in the event that the expected satisfaction from a particular purchase is not realised after consumption; and
f) capacity to initiate and pursue redress through available channels.

4. Critical evaluation of existing mechanisms

Different kinds of problems related to customer voice mechanisms may arise. Primarily, it is possible to question to what extent is the feedback collected through such channels representative. Secondly, some channels might be available for customers to express their views, but that does not necessarily mean that they are regarded by customers as viable (Simmons et al, 2011). According to these authors, viability "relates to the prospects of users' views being recognised and accepted – and to the sense of disconnection and withdrawal that often accompanies low expectations or disappointing experiences" (Simmons et al, 2011, p. 3). In this section we discuss how these concepts apply to some of the mechanisms identified previously.

When assessing service quality, in many cases it is very difficult to have control over who gives feedback. It is possible to make sure that those who participate in a customer satisfaction survey have come into contact with the service provider, but it is almost impossible to ensure that they all are informed customers. As Simmons and Brennan (2017) stress, "the legitimacy of user knowledge lies both in users' informed evaluation of their own needs and their lived experience of public service use". Surveys are strong in collecting a large amount of information, but weak in pointing out ways on how to improve. Feedback is obviously limited to the aspects that were identified a priori, when designing the instrument. The ability of

Excellence in Services
21th International Conference
Conference Proceedings ISBN 9788890432781

530

Le Cnam
Paris (France)
30 and 31 August 2018

customer surveys (the most usual mechanism) to collect valuable customers' feedback is limited, not only because of their highly-structured nature in most cases, but also due to the vulnerability of many users, particularly in markets in which suppliers have considerable power and/or when complex products and services are at stake.

On the other hand, complaints are important to understand the sources of customer dissatisfaction. Whether or not they achieve this purpose essentially depends on the users' perceptions of the cost-benefit trade-off of complaining. Too often, service providers create barriers to complaining or tend to shape a false consciousness in which people accept their role in the existing order of things and do not complain (Simmons and Brennan, 2017). Social services are a well-known example of this problem. In many cases, although complaining schemes are rather often formally implemented (and enforced by law), the number of written complaints is extremely low, even when situations of poor quality services exist and are well-known in the public opinion. Vulnerable customers tend to perceive the cost of complaining as higher than 'ordinary' customers do (due to the complexity of the process they have to go through to make a complaint, the lack of support from frontline employees, etc.) and have lower expectations of the associated benefit (distrust on service providers willingness to respond to their claims, feeling of discrimination, among others).

When collecting customer feedback providers increasingly rely on electronic and multimedia communication voice mechanisms, which require consumers to have technological tools and devices and technical skills to participate. These barriers further reinforce the vulnerability problem, especially when some customers have low qualifications and very limited access to electronic channels.

As mentioned earlier, several voice mechanisms exist that intend to go beyond service recovery or customer satisfaction measurement, aiming to foster innovation by providing meaningful inputs for service design. Such mechanisms aim to overcome the limitations of highly-structured approaches in understanding value creation, which, as pointed out in the literature (e.g. Lagrosen 2001), tend to validate what is known on advance without looking at less obvious sources of value creation.

In the case of co-production and co-design tools, the main point to enhance their effectiveness and relevance lies on the service provider willingness to value customer input and to engage in open and complex partnerships. As Osborne and Strokosch (2013, p. 40) put it, "it is not simply a case of empowering service users and expecting them to immediately begin transforming (public) services. Enhanced co-production requires a genuine partnership between public service professionals and service users that is predicated upon the use of knowledge to transform service delivery".

Service design makes use of rich and time-consuming tools (focus groups, observant participation, etc.), involving a limited number of users. Viewing the service from the vulnerable customers' point of view would be essential. Yet, ensuring their presence in co-design is particularly challenging. A possibility would be to include their representatives on service deigning teams. However, in a recent paper, Dietrich et al. (2017, p. 665) call attention to the drawbacks of the "dominance of expert-driven transformative services" and the importance of developing a more "inclusive approach". Based on their findings a successful approach for co-design with vulnerable customers should comprise six steps: sourcing, planning, recruiting, sensitising, facilitation and evaluation.

5. Conclusions and recommendations

Quality models, in particular those that are used to assess organisational performance, adopt the customer focus principle and encourage organisations to implement mechanisms to collect customer feedback on a regular basis. Customer feedback is regarded as essential to drive improvement and ensure that organisations consistently deliver value to their product/service users.

Given the importance of customer voice mechanism for quality assessment and planning, it would be important to ensure that all customers have opportunity to express their views and, to a certain degree, influence service delivery. This paper has looked in particular to the challenges raised by the existence of vulnerable customers.

The issue has been clearly neglected in quality management literature (and practice). Although there is a high consensus in the literature (and among policy makers) that not all customers have identical power to influence service delivery, the customer focus concept intrinsically incorporates the idea that services respond to the needs of a so-called "average" user. Previous studies indicate that when beneficiaries are vulnerable voice and exit mechanisms (even if they exist, have low efficacy (Bruce, 1995).

The current paper stresses that quality models indeed require organisations to measure customer satisfaction and to have complaint handling procedures, with some quality approaches also pointing out the importance of incorporating customer views when designing new products and services. Customer voice mechanisms are therefore a cornerstone of quality assessment and planning. At the same time, quality models give considerable freedom for organisations to select the tools and instruments they feel more adequate to their own needs and characteristics.

However, the research also shows that none of the most well-known quality models mentions in their fundamentals, criteria or sub-criteria the existence of customers with different degrees of power/vulnerability or the consequences associated with such problem. It becomes rather evident that, regardless of the channel at stake, vulnerable customers tend to be at a disadvantageous position. Not only they often lack personal resources (money, skills/education, confidence) to exercise their voice, but they also tend to mistrust organisations and their willingness to listen and be receptive to their views. Given the sub-representation of vulnerable customers in quality assessment and planning, it is possible to conclude that these customers are indeed being left behind by most quality initiatives.

In order to overcome (or mitigate) some of the problems identified, it is possible to derive some recommendations to be adopted by service providers when dealing with vulnerable customers (some of them in line with good practices suggested by bodies such as the OCDE (OECD, 2013) and the FCA in the UK (FCA, 2015):

I. Having a more proactive attitude by asking for vulnerable customers feedback rather than simply waiting for them to come and exercise their voice;

II. Combining on-line and face-to-face channels to collect customer feedback – some technological interfaces and on-line channels might not be inclusive. Therefore, different approaches need to be implemented.

III. Using plain language in all channels used to communicate with customers, avoiding technical jargon and incomprehensible words and abbreviations – consumers are often overwhelmed by complex information and have difficulty in selecting and processing information they might need to make rational choices. Complexity raises disinterest and distrust. Clear and simple information is important to all consumers, but is particularly key for those who are more vulnerable;

Excellence in Services
21th International Conference
Conference Proceedings ISBN 9788890432781

532

Le Cnam
Paris (France)
30 and 31 August 2018

IV.   Making complaining easier by adopting a more friendly attitudes towards customers with difficulties in expressing their problems;

V.   Training some customer contact employees for being better able to deal with vulnerable customers (having competencies to listen to them) – frontline staff plays a crucial role for the customer's experience. Changing the attitudes of customer contact employees might also requires performance appraisal schemes adaptations allowing them to spend more time in understanding customer problems when necessary. As pointed out in FCA (2015 p. 10), "staff on the frontline do not need to be experts, but they need sufficient training to facilitate a proper conversation, to know where internal expertise lies, and know how and when to refer on".

VI.   When necessary due to privacy and data protection issues, considering the implementation of solutions for temporary delegation (enabling a family member or carer to manage some affairs for some time), when customers are suffering from temporary vulnerability conditions.

VII.   Having efficient processes for identifying and referring vulnerable customers on to specialist teams who have skills and authority to design specific and flexible solutions to some problems.

VIII.   Encouraging the emergence of meaningful customer representatives to work with them on a regular basis improving current services and designing new services able to better meet the needs of vulnerable customers.

From the quality management perspective, it would be important to incorporate in organisational assessment models a dimension related to the evaluation of the strategies and mechanisms an organisation uses to listen to vulnerable customers and empower them as much as possible. Currently the existence of representatives and other consumers' networks is not clearly acknowledged by the generality of quality models as an area to address when analysing organisational performance and conducting accreditation exercises.

It is important to stress that regulations and laws, no matter how important they might be, cannot alone solve the problems. Organisational culture changes are essential (Simmons and Brennan, 2013). Values of openness, receptiveness and commitment need to be reinforced. In any case, not giving enough attention to vulnerable customers has social and economic risks that cannot be ignored.

References

APCER (2015). *Guia do Utilizador 9001: 2015,* APCER, available at https://www.apcergroup.com/portugal/images/site/graphics/guias/APCER_GUIA_ISO9001_2015.pdf

Berg, L. (2015). "Consumer vulnerability: are older people more vulnerable as consumers than others?", *International Journal of Consumer Studies,* 39: 284-293.

Brown, T. (2008). "Design Thinking", *Harvard Business Review* June: 1-10.

Consumer Affairs Vitoria (2004). *What do we mean by 'vulnerable' and 'disadvantaged' consumers?.* Discussion Paper Consumer Affairs Vitoria, Melbourne, Australia.

Davis, J. (2009). "Entrenchment of New Governance in Consumer Policy Formulation: A Platform for European Consumer Citizenship Practice?", *Journal of Consumer Policy*, 32: 245-267.

Dietrich, T., Trischler, J., Schuster, L., Rundle-Thiele, S. (2017). "Co-designing services with vulnerable consumers", *Journal of Service Theory and Practice,* 27(3): 663-688.

EFQM (2018). *The EFQM Model in Action*. European Foundation for Quality Management, Belgium: Brussels, available at http://www.efqm.org/efqm-model/efqm-model-in-action-0

EFQM (2013). *An overview of The EFQM Excellence Model*. European Foundation for Quality Management, Belgium: Brussels, available at http://www.efqm.org/sites/default/files/overview_efqm_2013_v1.pdf

FCA (2015). *Consumer Vulnerability.* Occasional Paper No.8, Financial Conduct Authority, London, UK.

Hogg, M. K., Howells, G., Milman (2007). "Consumers in the Knowledge-Based Economy (KBE): What creates and/or constitutes consumer vulnerability in the KBE?", *Journal of Consumer Policy*, 30(2): 151-158.

Jilke, S. (2015). "Choice and Equality: Are Vulnerable Citizens Worse-Off after Liberalization Reforms?", *Public Administration,* 93(1): 68-85.

Lagrosen, S. (2001). "Strengthening the weakest link of TQM: from customer focus to customer understanding", *The TQM Magazine*, 13(5): 348-354.

NIST (2017). *Baldrige Excellence Builder 2017-2918,* Baldrige Foundation, USA: Gaithersburg, available at https://www.nist.gov/sites/default/files/documents/2017/02/09/2017-2018-baldrige-excellence-builder.pdf

Osborne, S., Strokosch, K. (2013). "It takes two to tango? Understanding the co-production of public services by integrating the services management and public administration perspectives", *British Journal of Management*, 24: 31-47.

OECD (2013). *OECD Skills Outlook 2013: First Results from the Survey of Adult Skills*. OECD Publishing, Paris, available at: http://dx.doi.org/10.1787/9789264204256-en

Sá, Patrícia M. (2018). "For Best Results", Quality Progress, January: 38-44.

Simmons, R., Brennan, C. (2017). "User voice and complaints as drivers of innovation in public services", *Public Management Review*, 19(8): 1085-1104

Simmons, R., Birchall, J., Prout, A. (2011). "User Involvement in Public Services: 'Choice about Voice'", *Public Policy and Administration,* 27(1): 3-29.

Excellence in Services
21th International Conference
Conference Proceedings ISBN 9788890432781

534

Le Cnam
Paris (France)
30 and 31 August 2018