Supporting Vulnerable Customers Policy

1. Overview and Application

As a general insurance broker that holds an AFSL and subscribes to the National Insurance Brokers Code of Practice (NIBA Code), Aviso Group Partners is committed to conducting its business in accordance with all applicable laws, regulations, and codes, and in a way that meets customer and community expectations.

This Supporting Vulnerable Customers Policy (Policy) sets out how Aviso Group Partners, our authorised representatives and staff, identify and support vulnerable customers.

For the purposes of this Policy, any reference to "Customers" includes customers of Aviso Group Partners as well as any other individual entitled to support under the Code (for example a potential customer, third party beneficiary or an individual an insurer is seeking to recover money from) and whose ability or circumstances requires us to take extra care in the way we provide our services to ensure they are not disadvantaged in any way.

This policy applies to all staff employed by or acting on behalf of Aviso Group Partners, including all staff working for authorised representatives of Aviso Group Partners and are involved in arranging insurance under Aviso Group Partners' AFSL.

Aviso Group Partners must ensure that all staff (including staff of authorised representatives) read and comply with the policy.

Please note, insurers that have binding authority agreements with Aviso Group Partners may impose additional requirements for compliance with the vulnerable customers policy they have in place to comply with the General Insurance Code of Practice. Those procedures must be applied as required under the agreement with the insurer. The NIBA Code does not apply to the services we perform for the insurer under binder whilst acting as an agent of the insurer (for example issuing contracts of insurance on behalf of the insurer or handling claims on behalf of the insurer).

2. Purpose

Aviso Group Partners, our authorised representatives and staff, are committed to exercising greater care when dealing with vulnerable customers to provide them with support. This purpose of this policy is to help Aviso Group Partners staff, our authorised representatives, and their staff:

- Understand and recognise vulnerable customers.
- Have awareness of vulnerable customer groups.
- Understand the support options available to vulnerable customers and the extent to which Aviso Group Partners can provide support.
- Take account of a customer's particular needs or vulnerabilities.
- Engage a customer or potential customer with sensitivity, dignity respect & compassion; and
- Seek further internal or external support for the customer where required.

3. What makes a customer vulnerable?

Vulnerable customers are customers who, because of socio-demographic characteristics, behavioural characteristics, personal situation, or market environment are **especially susceptible to loss or harm.** A person may be vulnerable due to a range of factors, including:

(i) age;

(ii) disability;

(iii) mental health conditions;

(iv) physical health conditions;

(v) family and domestic violence;

(vi) language and/or literacy barriers;

(vii) cultural background;

(viii) Aboriginal or Torres Strait Islander status;

(ix) remote location;

(x) financial distress; or

(xi) other personal or financial circumstances causing significant detriment.

It is important to note that while a customer may fall into one or more of the categories listed above, this does not mean that the customer is necessarily experiencing vulnerability. Each staff member will need to assess their customer's situation and vulnerabilities on a case-by-case basis and ensure that every customer is treated with respect, dignity, and empathy.

4. Identifying Vulnerable Customers

While vulnerable customers are typically identified as specific groups of people, anyone can experience vulnerability at any stage in their life. Vulnerability can be permanent, long-term, temporary, or even linked to a specific event such as a natural disaster or insurable event. The support we provide to vulnerable customers may vary depending on their situation and the service they have sought from Aviso Group Partners. Authorised representatives and staff should make best efforts to identify any vulnerability during interactions with existing and prospective customers. Where possible, you should not request a customer to provide evidence or information to demonstrate that they are experiencing vulnerability.

Identifying vulnerable customers should be an intrinsic part of the getting to know your customer process. When engaging with customers, Aviso Group Partners requires all staff and authorised representatives to use the CARE and BRUCE protocols to help them assess whether the customer is or may be experiencing vulnerability.

The CARE Protocol

Comprehend: Is the customer able to follow the conversation and understand what is being said?

Assess: Is the customer able to weigh up the information being presented to them?

Retain: Is the customer able to retain and remember information, and recall this at a later point?

Evaluate: Is the customer able to properly express, explain or communicate their decisions?

The BRUCE Protocol

Behaviour & Talk – are there any clues in the customer's speech and behaviour?

Remembering – are there any signs that the customer has difficulty with recall?

Understanding – are there any signs that the customer is having difficulty understanding the information you are giving them?

Communication- is the customer able to communicate what they think, their decision and any questions?

Evaluation – is the customer finding it difficult to weigh up all the information?

Authorised representatives and staff at Aviso Group Partners should encourage customers to communicate and let them know if they are experiencing conditions, concerns or events which are causing them greater vulnerability, as Aviso Group Partners may not otherwise be able to identify their vulnerability or be aware of their circumstances.

Authorised representatives and staff at Aviso Group Partners may have multiple conversations with customers where indicators of vulnerability may be identified, such as comments made by a customer in relation to mental health struggles, grief related to the loss of a loved one or overwhelming debt. During these discussions, additional assistance or support should be offered but not forced.

Identifying vulnerable customers can be more difficult when authorised representatives and staff are unable to speak with them directly i.e., via a website portal or email. In these circumstances, authorised representatives and staff should be aware to the following, what may be indicators that a customer is experiencing vulnerability. For example:

- Delayed response: Does the customer take a long time to respond to communications?
- Repetition: Do you frequently repeat advice you have previously provided?
- Frequent late payments: Does the customer regularly miss payment deadlines?

5. How to record & escalate information once a vulnerable client is identified

It is important that if a customer self-identifies as experiencing vulnerability, they are made aware of how the information they share about their situation will be handled and how any personal or sensitive information will be recorded, used, and stored. Authorised representatives and staff should, where appropriate, use the TEXAS framework below to assist in communicating with customers.

Thank them.

Explain how their information will be used.

e**X**plicit consent - **A**sk the individual for their permission to use their information in this way

Ask three key questions that will help you better understand the customer's situation.

Signpost to internal or external help (where appropriate)

If due to a situation involving the customer, or the customer's vulnerability, it is not possible to follow the above framework, please speak with your practice principal, manager, business development manager, regional manager, or the compliance team on how to support the customer in understanding how information about their vulnerable situation may be used.

Authorised representatives and staff of Aviso Group Partners will maintain accurate notes in relation to a customer's vulnerability and retain this information securely and confidentially, in accordance with Aviso Group Partners' privacy policies.

Aviso Group Partners considers the practice principal is responsible for handling vulnerable customers if the original authorised representative is not able.
For Aviso Group Partners Staff, the staff member is responsible for handling vulnerable customers, with their manager providing support if necessary.

6. How Aviso Group Partners will support vulnerable customers

Authorised representatives and staff at Aviso Group Partners will employ a range of measures to support and accommodate vulnerable customers where possible. These will vary from situation to situation but may include:

- Being flexible with allowing extra time to explain advice and answer questions;
- Arranging meetings in person or via teleconference;
- Allowing for an authorised third party (such as a consumer representative, interpreter, friend, or family member) to attend meetings with the customer.

The table below provides a list of possible actions authorised representatives, and staff at Aviso Group Partners may take:

Vulnerability Type	Possible actions to consider
Customers with communication difficulties (hearing impairment, language barriers, age related diseases)	• Ask if they have a support person, independent person or family member that could help on the call. • Do they require an interpreter? • Ask the customer to repeat the information you have provided and advise you will provide it in a follow up email for them to read. • Provide information for external resources who can provide support.
Customers with mental illness	• Avoid confrontation. • Confirm if they would prefer to have a support person, independent person or family member that could help on the call. • Keep information simple and factual. • Ask them what would help them. • Consider if it would be more appropriate to reschedule the call. • Provide information for external resources who can provide support. • Escalate the call if required to the Practice Principal.
Personal Circumstances (traumatic event (flood – loss of property), bereavement, isolation)	• Keep information simple and factual. • Ask the customer to repeat the information you have provided (where appropriate) and advise you will provide it in a follow-up email for them to read. • Provide information for external resources who can provide support.
Personal Circumstances (financial difficulties)	• Notify the insurer on the customer's behalf as soon as practicable after becoming aware that the customer is experiencing financial hardship. • Act on any insurer's instructions to put any action to recover an amount from the customer on hold pending the outcome of the application for financial hardship support. • Provide information for external resources who can provide support.

Family or Domestic Violence – this can be particularly important if: • The Customers and the perpetrator are joint policy holders • The perpetrator has caused the claim – for example, damaging property under the policy	• Being mindful of the environment the customer is currently speaking from. • Clearly articulate any process taking place either within broking or claims. • Determine the best way to remain in contact with the customer throughout the process. • Recording clearly on systems any specific flags or communication requirements should any face-to-face visit occur. • Seek further support from your practice principal, business development manager, regional manager, or the Aviso Group Partners compliance team. • Provide information for external resources if appropriate. • If you believe the customer is in immediate danger, call 000.
Other vulnerability	• Employees should contact their manager, business development manager, regional manager, or Aviso Group Partners compliance team with any other questions regarding supporting vulnerable customers.

7. Support Services and Resources

The following list provides possible external resources Aviso Group Partners authorised representatives and staff can refer to when presented with a vulnerable customer. Referrals to organisations such as Lifeline need to be handled with sensitivity, and should not occur prematurely, or simply because the customer feels Aviso Group Partners, or the insurer are not meeting their service expectations.

Service	Service Available	Phone / Website
1800 RESPECT	National 24-hour Domestic & Family violence and Sexual Assault Line	1800 737 732 1800respect.org.au
Beyond Blue	24/7 support to people experiencing anxiety or depression	1300 224 636 beyondblue.org.au
GriefLine	24/7 support to people experiencing grief	1300 845 745 griefline.org.au

Lifeline	24/7 counselling & referral service for people in a crisis situation	13 11 14 lifeline.org.au
MENSLINE	24/7 support, information and referral service for men with family and relations issues	1300 789 978 mensline.org.au
Mob Strong Debt Helpline	Free and confidential financial counselling to assist indigenous Australians.	1800 808 488
National Association of Community Legal Centres	An independent not-for-profit community organisation that provides legal and related services to the public, focusing on the disadvantaged and people with special needs	(02) 9264 9595 naclc.org.au
National Debt Hotline	Free and confidential financial counselling to assist people in financial difficulty.	1800 007 007 ndh.org.au
National Relay Service	A phone service for people who are deaf or have a hearing or speech impairment.	1300 555 727 SMS 0423 677 767
Relationships Australia	A leading provider of relationship support services for individuals, families, and communities. It aims to support all people in Australia to achieve positive and respectful relationships.	1300 364 277 relationships.org.au

8. Training and Support

Aviso Group Partners understands the importance of continued training and support for authorised representatives and staff servicing customers experiencing vulnerability. It is important that Aviso Group Partners authorised representatives and staff can reasonably identify whether a customer is experiencing vulnerability and manage the relationship and service provided to the customer.

To ensure our Aviso Group Partners authorised representatives and staff who deal with vulnerable customers do so in a respectful and empathetic manner, we provide the following:

- Annual training on supporting vulnerable customers and internal dispute resolution;
- Annual review of the Supporting Vulnerable Customers policy.

Aviso Group Partners also recognises that staff members and authorised representatives who engage with vulnerable customers may also require additional support.

To provide this support:

- Practice principals will be responsible for monitoring staff on a regular basis for any signs that they may require support
- Aviso Group Partners managers will be responsible for monitoring Aviso Group Partners staff on a regular basis for any signs that they may require support.
- All staff are provided with access to the Steadfast Access EAP for counselling. Access EAP (Employee Assistance Programs) partners with organisations to promote employees' well-being and assist them after critical incidents that may require AR or Staff counselling. Access EAP also offers education about conflict resolution and emotional well-being. Authorised representatives and staff should refer to their practice principal, manager, or the Aviso Group Partners compliance team for details on how to access assistance.

9. Review

This Policy will be reviewed annually or as required by updates to the NIBA Code.