



Vulnerable Customers Policy

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This document supersedes and replaces any previous issue.

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1 Purpose

This **policy** is designed to recognise that from time to time, members, beneficiaries, and any other customers who engage with CareSuper (the Fund) may experience vulnerabilities that can make interactions more difficult. Its aim is to ensure fairness and equity of service for all members, their beneficiaries and any other customers who may interact with CareSuper, and assist vulnerable customers with care and respect, in all our dealings with them.

CareSuper is committed to taking extra care in all circumstances, and to ensure that our interactions do not add to or cause further distress, but rather contribute to a positive outcome.

CareSuper is committed to empowering all staff to be able to confidentially identify a vulnerable customer and to ensure the customer can access support if they need it.

2 The framework

This vulnerable customer supports the operations of CareSuper that identify, assess, monitor and record identified vulnerable customers and understand the events or ongoing needs for which they may need support to mitigate or manage their circumstances and arrive at the best possible outcome.

The framework will continue to be regularly reviewed so it is consistently improved and evolved.

Key Guiding principles

There are four key guiding principles underlying this Policy:

- Recognising that vulnerable customers may require additional unique support when interacting with CareSuper at all levels
- The Policy should ensure that the experience of vulnerable members dealing with CareSuper provides equal outcomes to other members and is free from any discrimination
- The Policy is appropriately supported through a set of robust checks and balances and helps our staff in dealing with customers identified as vulnerable, and
- Ensures that any of CareSuper's external partners or service providers who interact with customers, including the Fund Administrator and Fund Insurer, agree and demonstrate these principles.

3 What is customer vulnerability

Vulnerability is about customers whose circumstances could make them more susceptible to harm, loss or disadvantage, either personal or financial. This includes customers that may be suffering trauma or may not be able to represent their own interests.

In these circumstances we may apply extra consideration, support, or care, to help them achieve a similar outcome to someone who is not in those circumstances.

Vulnerability can be temporary or permanent, gradual, or sudden. CareSuper understands that anyone can become vulnerable at any time. For instance, a person can become vulnerable through one significant event – for example an accident or a person diagnosed with serious illness. Or their vulnerability can be exacerbated by several interconnected events or sets of circumstances – for example an elderly person living in a remote location, following the death of their partner.

For some, vulnerability is established over a long period of time– for example, those living in circumstances of multi-generational financial hardship.

A customer may be included in one or several vulnerable groups but not require additional support when interacting with CareSuper.

We aim to provide customers with tailored and appropriate support to ensure that everyone receives the best possible service.

4 Identification of vulnerable groups

CareSuper recognises that vulnerability is a state and does not define a customer's needs. A customer who identifies or may be considered to identify with any of the below groups may not necessarily be vulnerable and require assistance. Each customer's situation will be treated sensitively on a case-by-case basis.

Customers may identify with the one or more of following vulnerable groups:

- Aboriginal or Torres Strait Islander status
- LGBTQIA+, biological sex and gender identity
- Low literacy or financial literacy
- Culturally and linguistically diverse backgrounds
- Age-related – young or elderly
- Disabilities, including physical, Intellectual, Mental illness, sensory, neurological, learning disability, physical disfigurement or Immunological
- Mental health conditions (including self-harm threats)
- victims of Scams and fraud / compromised accounts
- impacted by Natural disasters
- Serious illness or injury
- Death of a relative
- Domestic and family violence
- Members with vision or hearing impairment
- Financial distress
- Unemployed
- Homelessness

Other circumstances that may cause significant detriment

This list of vulnerabilities is not exhaustive. Where CareSuper identifies other vulnerabilities, these will be included in this Policy and framework.

5 Difficulty proving identity

In some limited circumstances, such as a customer identifying as Aboriginal or Torres Strait Islander, customers may be unable to meet CareSuper's usual proof of identity requirements.

Some other examples of when this might occur include when:

- The customer is a minor
- The customer is applying from overseas or is itinerant
- The customer is subject to unusual but not suspicious circumstances
- The person certifying a copy of relevant documentation is not from within the list of persons able to certify documents (e.g., because the customer is currently overseas)
- The customer does not possess, and is unable to obtain, necessary information or proof of identity. This may include a person whose birth was not registered or who is homeless, an undocumented arrival, a person living in remote areas, a transgender or intersex person, a person affected by natural disasters, a person with limited access to identity documents (for example because they were raised in institutional or foster care), a person with limited participation in society or a person who has not established a 'social footprint' in the community.

CareSuper's identification and verification procedures may be modified in these circumstances. We're able to request 'reliable and independent documentation' in line with AUSTRAC* guidance:

<https://www.austrac.gov.au/business/how-comply-and-report-guidance-and-resources/customer-identification-and-verification/identifying-customers-who-dont-have-conventional-forms-id>.

6 Staff training

While we actively seek to identify vulnerable customers, we encourage customers to inform our staff if they are facing difficulties so we can provide the appropriate support.

We acknowledge that the needs of vulnerable members may be permanent or temporary and can change over time or increase in certain situations, so detailed record-keeping and clear communications are essential to a positive customer experience.

Training

Training will be provided to all customer-facing staff at CareSuper. This includes assisting staff to identify vulnerability risk factors. CareSuper will also ensure any customer-facing third party providers (e.g. our Fund Administrator and Insurer) have similar policies and procedures in place and that they understand the expectations of CareSuper.

Identification

Staff need to be aware of the indicators that the person they are interacting with may not have the capacity, at that moment in time, to make an informed decision regarding the information being provided to them. This is achieved by our staff listening, identifying needs, and adjusting their approach accordingly.

7 Ongoing support

Staff should be alerted if the customer shows any of the signs listed below at any point:

- Asks staff to speak up or speak more slowly
- Cannot hear the complete conversation or are missing important information provided
- Does not understand what staff are saying
- Appears confused
- Sounds flustered or irrational, potentially irate beyond what would be considered reasonable
- Is upset, distressed or mentions that they have intentions to self-harm
- The member sounds as if they are being coerced by another person during the call
- Contacts us frequently asking the same questions or changing their story
- Indicates that there is a language difficulty
- Makes a claim for hardship, TPD or terminal illness
- Makes a complaint about adverse treatment, access to services or another matter that would be covered by this policy
- Reports an event or circumstance that fits with the vulnerability definitions such as homelessness (cannot provide an address), domestic violence, temporary or chronic illness, mental health issues or injury.

Recording interactions

When a vulnerable member is identified, we will ensure that a note is made on the relevant account, so that any future interactions are identified and managed with the appropriate care. Staff may request permission to make this note and keep a record of the support or assistance required in the future.

Additional support

Where a customer requires additional support from a third-party such as a family member, friend or other representative, we will support this where possible. Before a third-party can access information on behalf of a member, the member will need to complete a verbal or written

Authority to access information form available at caresuper.com.au/publications or phone us on 1300 160 149 and we'll talk them through the process.