

Supporting Vulnerable Customers Policy

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1. Policy Overview

Claim Central Consolidated Pty Ltd (ABN 44 602 460 953) and its related bodies corporate (**Claim Central**) agrees to be bound by the General Insurance Code of Practice (the **Code**).

The Code requires Insurers and, by extension Claim Central, to have internal policies and training in place to understand and support customers and others who are experiencing vulnerability, including people affected by family violence.

Claim Central is committed to taking extra care with customers who experience vulnerability and supporting Insurers to do the same. Claim Central recognises that a person's vulnerabilities can give rise to unique needs, and that their needs can change over time and in response to particular situations.

This Support for Vulnerable Customers Policy (**Policy**) sets out how Claim Central will identify, and support people who experience vulnerability, including people affected by family violence.

The objectives of this Policy are to:

- Set out the framework and processes to identify, support and help minimise the risk of harm in interactions with vulnerable customers;
- Ensure Claim Central provides timely, consistent and targeted assistance to those affected by family violence; and
- Ensure Claim Central Employees:
 - Understand if a person may be vulnerable;
 - Decide about how best, and to what extent, Claim Central can support people with vulnerabilities;
 - Take account of particular needs or vulnerabilities; and
 - Engage with people with vulnerabilities with sensitivity, dignity, respect and compassion — this may include arranging additional support, for example referral to people, or services, with specialist training and experience.

For the purposes of this Policy, 'customer' means an individual insured, a third-party beneficiary, a potential customer or an individual that an Insurer is seeking to recover money from.

This Policy applies to Retail Insurance products only.

2. Claim Central Clients

Claim Central clients will develop and implement policies to support customers and others who are experiencing vulnerability, including people affected by family violence:

Claim Central clients will publish on their website and in any branches, an up-to-date list of assistance and referrals (internal or external) available to customers affected by family violence and how customers may access such assistance. If asked Claim Central Employees should direct customers to the appropriate client website to obtain a copy of their policy.

3. Claim Central's responsibilities

Customers affected by family violence need to be able to quickly access information about the policies they hold, the claims process and the support available to them.

Claim Central will work with and support its clients to:

- Ensure that safety is paramount for anyone affected by family violence;
- Provide training to Employees to recognize family violence and improve responses to someone affected by family violence;
- Protect the privacy of customers affected by family violence;
- Minimise the number of times a customer affected by family violence needs to disclose information about family violence;
- Ensure appropriate and sensitive claims handling processes for customers affected by family violence;
- Ensure collection arrangements are handled sensitively;
- Arrange access to Financial Hardship help;
- Inform customers, employees, distributors and service suppliers about information and assistance available to people experiencing family violence;
- Refer customers, employees and distributors to specialist services; and
- Support employees and distributors who:
 - are affected by family violence; or
 - experience trauma after serving affected customers.

4. How do I know if a client is Vulnerable?

A person's vulnerability may be due to a range of factors such as:

1. age;
2. disability;
3. mental health conditions;
4. physical health conditions;
5. family violence;
6. language barriers;
7. literacy barriers;
8. cultural background;
9. Aboriginal or Torres Strait Islander status;
10. remote location; or
11. financial distress.

This is not an exhaustive list and Claim Central Employees should keep an open mind about what constitutes vulnerability. Each customer has their own unique story, which is personal to them and can be very sensitive. To help support our customers, our communication or service needs to be tailored depending on their individual needs and circumstances.

Some examples may include;

- Elderly customers who may be hearing or sight impaired or need extra time;
- Loss of employment for our customer or family member;
- Family breakdown;
- Illness, including physical incapacity, hospitalisation, or mental illness of the customer or family member;
- A customer who may be experiencing domestic violence; or
- A death in the family.

It's imperative that Claim Central Employees take the necessary measures to make the claim interactions a positive experience, which is guided, prompt, and respectful.

In these circumstances, Claim Central may choose to send out a representative who has the expertise to meet the customer in person and walk them through the claim process. This will assist the customer to gain a confident understanding of the next steps required to get them back to normal quickly and easily.

5. How does Claim Central provide support?

If a customer affected by family violence makes an insurance claim, Claim Central needs to handle the claim with sensitivity, flexibility and care.

This is particularly important if:

- the customer and the perpetrator are joint policyholders; &/or
- the perpetrator has caused the claim — for example, by damaging the customer's property.

Claim Central will ensure that Claim Central Employees have the skills, tools, and training to handle these claims with flexibility and care.

The Central training program will encompass training on:

- The need for Claim Central to clearly and transparently explain to the customer the claims process and what is required of them;
- Having specialist employees with adequate authority to make decisions in family violence-related claims;
- Interacting with survivors of violence and possible triggers of violence;
- Handling communication with vulnerable customers and victims of domestic violence including that customers may not have access to a telephone or email or to their personal or financial records, or their other documents; and not require the customer to do either of the following (unless they are comfortable doing so):
 - make direct contact with the perpetrator; or
 - make a police report about the perpetrator.
- Ensuring that anyone interviewing or investigating a customer who may be affected by family violence (or going to their home):
 - is aware that they may be putting themselves in danger; and
 - is appropriately trained under the investigation standards of the Code.
- Settlement of claims, in cases of family violence and family law property disputes.

If Claim Central Employees are told, or identify, that due to a vulnerability someone is in need of additional support or assistance, they will work with that person try to find a suitable, sensitive and compassionate way to proceed.

Claim Central will do this as early as practicable and will protect each individual's right to privacy. If Claim Central Employees can see or identify, that a customer needs additional support from someone else (for example, a lawyer, consumer representative, interpreter or friend), then the Claim Central Employee will recognise this and allow for it in all reasonable ways. Claim Central will try to make sure its processes are flexible enough to recognise the authority of our customer's support person.

Additional support may include making it easier for customers to communicate with Claim Central or referring them to a financial counsellor or an appropriate community support service.

If customers need support to meet identification requirements, Claim Central will take reasonable measures to support them — particularly if they are from an Aboriginal or Torres Strait Islander community or a non-English speaking background.

Where practicable, Claim Central will provide access to an interpreter and keep reports on where interpreters are used

Claim Central will where possible:

- Enable the customer to deal with the same employee each time, or to have a single pathway to an appropriately trained team;
- Provide copies of documents to the customer without charge to help resolve matters, or for legal purposes;
- Work with the customer's agent or representative — for example, a professional financial counsellor, lawyer, community services or social worker, legal aid officer or family violence specialist;
- Make it as simple as possible for the customer to appoint an agent or representative while recognising privacy obligations; and
- If required, referring the customer to a qualified, independent interpreter to assist with communication.

Claim Central Employees can play a role in identifying that a customer is experiencing family violence. This can help reduce the impact of the violence.

Insurers and their service suppliers can be involved in circumstances when indicators of family violence may first become apparent — for example, at claim time and after a major disaster.

Accordingly, Claim Central Employees and service suppliers will be trained in identifying family violence and to respond accordingly.

6. How does Claim Central's Business units and support services respond and support this change?

Claim Central provides claim management services including liability decisions on claims within a delegated authority in one or more ways via its many business units. Claim Central may be acting as an Agent, a Service Supplier or a Distributor either in isolation or as part of its combined TPA Claims Services (as those terms are defined under the Code).

As a Distributor and /or Service Supplier, Claim Central's obligation to its Insurer partners is that Claim Central will be honest, efficient, fair, transparent and timely in its dealings with their/our customers.

Claim Central's approach to managing vulnerable customers will differ depending as to the role or, the service that we are providing in that particular claim process.

Claim Central's Services

Any Service Supplier engaged to contact someone who has been affected by family violence must handle the situation with appropriate sensitivity.

Claim Central will ensure that service suppliers who deal directly with customers — such as loss assessors, investigators and claims management services — are trained to the same level as Claim Central Employees. That training will take place before the service supplier comes into contact with a customer who has been identified as being affected by family violence.

Claim Central will also ensure that:

- Service suppliers who deal directly with customers have been trained in and are aware of identifying vulnerability, such as family or domestic violence and are able to respond accordingly;
- Service suppliers understand and have information available for referral and support to customers experiencing vulnerability such as family or domestic violence; and
- Service suppliers are aware of the appropriate escalation process for notifying our specialist teams of any potential vulnerability noted.

- Appropriate sensitivity is applied when engaged to contact a customer who is experiencing vulnerability such as family or domestic violence or mental health.

Claim Central has processes, systems and training to:

- Appropriately triage matters involving family violence — including ensuring Claim Central Employee:
 - Decide — as a matter of priority — on a claim or whether to provide Financial Hardship help; and
 - Promptly escalate an issue to a more senior person;
 - refer the customer affected by family violence to specialist services that can give further guidance
- Ensure Claim Central Employees understand the impact of trauma on a customer affected by family violence — in particular, how trauma may affect the way they appear and present;
- Ensure Claim Central Employees engage with customers in a supportive manner;
- Ensure Claim Central Employees understand the potential impact — sometimes positive and sometimes negative — that an insurer’s actions can have on a customer experiencing family violence;
- Ensure Claim Central Employees understand the need for strict confidentiality and privacy in relation to a customer affected by family violence;
- Ensure Claim Central Employees understand the significant and heightened safety risks for women and children during and after a relationship separation;
- Ensure Claim Central Employees understand that perpetrators of family violence:
 - are customers whose needs have to be managed appropriately; and
 - may attempt to convince the employee to disbelieve or dismiss someone affected by family violence;
- Ensure Claim Central Employees understand the need for flexible arrangements for, and responses to, customers affected by family violence;
- Ensure Claim Central Employees understand the legal and procedural implications of court-issued family and domestic violence orders to the extent that these impact a claim or the customer experience; and
- Ensure Claim Central Employees know about local referral pathways and contacts for local support services.

7. Protecting customer privacy

Claim Central will provide for the secure and confidential handling of private and confidential, and personal information about any customers affected by family violence in order to protect their safety. These customers need to have confidence that such information — particularly their physical address — is secure and not at risk of deliberate or inadvertent disclosure.

Customers affected by family violence need confidence that the information about their family violence that they share with their insurer is not disclosed to any perpetrator and is accessible only to authorised employees.

The Code requires insurers and their Supply Chain Partners to protect the rights to privacy of vulnerable customers who have notified the insurer or Claim Central of their need for additional support from someone else (for example, a lawyer, consumer representative, interpreter or friend).

Claim Central will:

- Ensure it has systems in place to keep the customer’s contact information secure and confidential;
- Give customers access to personal information held about them in accordance with the Claim Central Privacy Policy.

8. Claim Central Employees

Claim Central Employees may also be affected by family violence and require support in the same way that others do. Employees may be adversely affected either by the impact of the customer’s issues or when their interactions with a customer cause them to relive their own experiences of family violence.

Claim Central Employees also may be perpetrators of family violence and need support to deal with that.

Claim Central will ensure that it has procedures and programs in place to support employees who are impacted by family and domestic violence. This will be reviewed on a case by case basis.

Claim Central has an Employee Assistance Program which is available to all staff 24 hours, 7 days per week. This is a confidential professionally resourced service available to support Claim Central Employees and their families through a wide range of challenges they may experience and is provided at no cost.

9. Training

As a Third-Party Claim handler and Service supplier Claim Central will align as appropriate to its Insurer's policies.

Claim Central may assign a Claim Central Employees, who can:

- Act as a referral point to support employees and suppliers or sub-contractors in managing vulnerable customers;
- Provide coaching to employees in vulnerable customer management best practice; and
- Act as an escalation point, where customers require management by an employee, supplier or sub- contractor with specialised training.

Claim Central will train Claim Central Employees to assist them to:

- Understand if a customer may be vulnerable;
- Decide about how best, and to what extent, they can support a vulnerable customer;
- Understand how to record and flag vulnerable customers in the claim management system;
- Understand how to take account of a customer's particular needs or vulnerability;
- Understand how to engage with a vulnerable customer with sensitivity, dignity, respect and compassion — this may include arranging additional support, for example, referring the customer to people or services with specialist training and experience.
- Understand how to protect private and confidential, and personal information of customers affected by family violence;
- Understand how to minimise the number of times customers affected by family violence need to disclose information about family violence;
- Understand how to help claimants who are affected by family violence — including those suffering Financial Hardship;
- Understand how to refer customers to specialist family violence services, where appropriate; and
- Understand how to support employees who are affected by family violence or who experience vicarious trauma after dealing with customers affected by family violence.

10. Reporting & Escalations

Claim Central's systems, claim and complaint files, along with all other relevant records must be maintained as follows:

- Vulnerability cases to be recorded in Claim Central's claim systems, including the recording of vulnerability type.
- Customer data, inclusive of vulnerability, to be managed in accordance with Claim Central's Privacy Policy.

Unless instructed by a client otherwise, if Claim Central Employees are notified of or identify a vulnerable customer, they must:

- Record relevant information on the claim file;
- Notify the client as early as possible, however no later than within 2 business days; and
- Escalate to the client as per their procedures for them to manage any client communications and referrals.

The notification should include:

- The date the vulnerability was disclosed or discovered;
- How the vulnerability was disclosed or discovered;
- The type/s of vulnerability;
- Details of any support or special requirements requested by the vulnerable customer; and
- Having knowledge of the file and the customer, any recommendations they made in responding to the vulnerable customer.

Note: If a customer is distressed and says that they are not coping and suggest or say they may harm themselves, the following actions must be taken:

- If the customer is in immediate danger call Emergency Services (000 in Australia and 111 In NZ)
- Escalate the call to the client's Care teams or our internal Leaders trained in dealing with these call types. They can then provide the customer with information from the Resource Services and Referral Contacts
- Suggest the customer appoints a support person to assist in the management of their claim.
- Seek advice from internal escalations points or clients.

Details of all notifications and offers of support for vulnerable clients are recorded within and saved to client specific share-point registers. These registers are made available to both internal consultants, leaders and managers as well as to Claim Central clients.

Claim Central will regularly review and improve this Policy and its associated processes and procedures.