

# Vulnerable Customers Policy

## Family Violence, Supporting Vulnerable Customers and Financial Hardship Policy

This Family Violence, Supporting Vulnerable Customers and Financial Hardship Policy (Policy) has been developed to comply with National Insurance Brokers Association (**NIBA**) Insurance Brokers Code of Practice (the **Code**) and sets out how Delaney Kelly Golding Pty Ltd (**DKG**) identifies and supports vulnerable Customers, including those affected by Financial Hardship and Family Violence.

For the purposes of this Policy, any reference to “Customers” includes customers of DKG as well as any other individual entitled to Financial Hardship support under the Code.

DKG is committed to exercising greater care when dealing with vulnerable Customers. A person may be vulnerable due to a range of factors, including:

1. Age;
2. Disability;
3. Mental health conditions;
4. Physical health conditions;
5. Family violence;
6. Language barriers;
7. Cultural background;
8. Aboriginal or Torres Strait Islander status;
9. Remote location; or
10. Financial distress.

### 1. Policy Statement

DKG has a long-standing commitment to conducting its business with honesty and integrity and remains committed to full compliance with the Code and informing Customers, employees, and any distributors and/or service suppliers that we may use about information and assistance available to vulnerable people, including those experiencing Financial Hardship and Family Violence.

This policy and DKG internal policy and training programs assist employees to:

1. Identify and understand if a Customer may be vulnerable;
2. Determine how best, and to what extent, they can support a vulnerable Customer;
3. Take account of a Customer's particular needs or vulnerability; and
4. Engage with a vulnerable Customer with sensitivity, dignity, respect and compassion. This may include arranging additional support and referring the Customer to specialised people or services.

DKG may need to be flexible and vary the approach based on individual circumstances, including providing more personalised support to help navigate our processes and working within any processes and procedures set by our security partners.

## 2. Family Violence

**In Australian law, 'Family Violence' is defined as:**

"Violent, threatening or other behaviour by a person that coerces or controls a member of the person's family or causes the family member to be fearful."

*Family Law Act 1975 (Cth), section 4AB.*

**Family Violence means much more than physical violence. It includes:**

- Emotional abuse, psychological abuse, sexual abuse, financial or economic abuse; and
- Damage to property.

The way employees deal with Customers who may be affected by Family Violence should facilitate, rather than act as a barrier to identifying Family Violence and improve the experience of those affected by Family Violence.

The aim of the Policy is to ensure that whenever Family Violence is identified or suspected, the safety of the Customer affected by Family Violence and their family is protected.

DKG recognises that Family Violence is unacceptable in any relationship and Customers experiencing Family Violence will be treated with dignity and respect.

The support of Customers experiencing Family Violence and their family is the highest priority. Customers who indicate or disclose Family Violence are able to access support from DKG that is appropriate to their circumstances.

### **3. Assisting Customers**

DKG can assist vulnerable Customers, including those experiencing Financial Hardship or Family Violence by:

- Ensuring safe and confidential communication in light of individual circumstances;
- Helping to set up new insurance policies;
- Helping to arrange access to financial hardship support; and
- Referral to specialist support services.

In circumstances where the issue is complex or unable to be dealt with by the primary person who took the call, it is to be immediately referred to the Compliance Team for consideration.

The Customer must be informed of this action.

### **4. Third Parties**

If DKG are advised or we identify that a client or potential client requires support from a third party (eg: lawyer, interpreter, or friend) we will make reasonable accommodations to allow for this.

### **5. Financial Hardship**

Financial Hardship occurs when Customers experience difficulty in meeting their financial obligations to DKG.

The support DKG can offer does not include support with paying the premiums under an insurance policy we have issued.

If a Customer informs DKG or we identify that they are experiencing Financial Hardship, we will provide them with:

- If appropriate, contact details for the National Debt Helpline – 1800 007 007.

## 6. Training

Training is tailored to all employee roles within the business and the degree of contact they have with Customers. DKG will aim to ensure that all employees and have been trained and receive ongoing training so that they:

- Are aware of DKG policies and procedures when they are engaging with vulnerable Customers;
- Identify vulnerable Customers, including those affected by Family Violence;
- Deal appropriately and sensitively with vulnerable Customers; and
- Apply the Family Violence & Supporting Vulnerable Customers policy and related policies and procedures relevant to their role in dealing with Customers.

Training is aimed at assisting employees to reduce the impact of vulnerability and Family Violence on Customers.

## 7. Reporting

Any notification of Vulnerability or Financial Hardship received by a member of staff must be reported to the Executive General Manager Governance, Risk and Compliance or, in their absence, to a Director.

## 8. Support Services and Resources

Agency	Phone	Website	Services available
1800 RESPECT	1800 737 732	1800respect.org.au	National 24-hour Domestic & Family Violence and Sexual Assault Line.
Beyond Blue	1300 224 636	beyondblue.org.au	24/7 support to people experiencing anxiety or depression.
Lifeline	13 11 14	lifeline.org.au	24/7 counselling & referral service for people in a crisis situation.

MENSLINE	1300 789 978	<a href="http://mensline.org.au">mensline.org.au</a>	24/7 support, information and referral service for men with family and relationship issues.
National Association of Community Legal Centres		<a href="http://www.naclc.org.au/">http://www.naclc.org.au/</a>	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.
National Debt Hotline	1800 007 007	<a href="https://ndh.org.au/">https://ndh.org.au/</a>	Financial counselling is a free, confidential service to assist people in financial difficulty.