

Customers Experiencing Vulnerability Policy

April 2023

Document Control & Version History

Policy	Customers Experiencing Vulnerability Policy
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Record of Amendments, Authorisations & Issues

Version	Revision Date	Drafted by	Nature of Amendment	Approval Required
1.0	27 April 2020	CRO Team	New Policy	SMT
2.0	January 2022	CRO Team	Change name of Policy Updated Policy format and content Incorporate Insurance in Super Guidance Notes	SMT
2.1	April 2023	CRO team	Updated to incorporate LICOP 2.0 Incorporate Family Violence Policy	CRO

1. Overview

The Customers Experiencing Vulnerability Policy (the Policy) sets out the ClearView Wealth Limited Group (ClearView) commitment to supporting customers who are vulnerable or experiencing a period of vulnerability. It is supported by specific Customers Experiencing Vulnerability Training, role specific coaching and tools which provide detailed guidelines about identifying customers experiencing vulnerability and how to support them. The Policy includes a sub-section, the Family Violence Policy.

2. Purpose

ClearView recognises that some customers may experience periods of vulnerability because of their personal circumstances. As a provider of financial products and services, we consider we have an obligation to ensure that we make reasonable adjustments and have additional support mechanisms for customers experiencing vulnerability to ensure that they are not at risk of detriment due to that vulnerability.

ClearView subscribes to the Life Insurance Code of Practice (LICOP) and is supportive of the Insurance in Superannuation Guidance Notes. In particular, the FSC's "Developing a vulnerable member policy" Guidance Note sets the standard for the industry to take extra care with customers who are identified as needing additional support. We are also obligated under the relevant laws and regulatory frameworks, including the requirements under our Australian Financial Services Licence to provide financial products and services efficiently, fairly and honestly. Supporting vulnerable customers also aligns with ClearView's Values and Code of Conduct.

3. Scope of the Policy

For the purposes of this Policy:

A customer experiencing vulnerability is someone who, due to their personal circumstances, is especially susceptible to harm or detriment

Whilst this Policy refers to vulnerable "customers", it includes anyone who interacts with us on behalf of our customers and are vulnerable or are experiencing vulnerability and staff members who are also customers; it includes their financial advisers and family members or other people acting on behalf of a customer.

This Policy applies across all ClearView businesses involved in the provision of financial products and services.

Customer vulnerability refers to current or future customers in circumstances which make them more susceptible to harm, loss, detriment or disadvantage, than a person not in those circumstances.

ClearView recognises that customers experiencing vulnerability may be unable to protect themselves against harm or exploitation resulting from personal circumstances such as their age, cultural background (including being of indigenous heritage), illness, financial stress, trauma, or other circumstances.

Vulnerability can be permanent, transient, progressive or situational.

4. Policy

ClearView encourages customers who need additional support to let us know how we can help them. If a customer does provide this information, and the customer agrees, such information should be recorded on the customer's file. When a future interaction takes place, ClearView frontline staff should exercise judgement based on their interactions with the customer on whether they still require additional help and update the customer's file if support is no longer needed.

ClearView will treat customers experiencing vulnerability (or their family, carer or support person) with empathy, compassion and respect. We will not assume that customers experiencing vulnerability are looking for extra service. We will not assume that we know what the customer is experiencing and will work to support the customer in accordance with their individual needs. Our commitment to being easy to do business with is demonstrated by (but not limited to) the following:

- easier communication with us
- supporting customers through the different stages of their policy or investment
- supporting customers through the underwriting and claims process
- supporting customers experiencing financial hardship
- providing information and materials that do not exclude or offend
- telling customers about relevant additional support and services that ClearView can provide to help them, where appropriate
- encouraging or referring to external support services where required
- acting as quickly as possible
- providing support related to interpreter services
- adapt our requirements in relation to identification and verification requirements (in line with AUSTRAC and other legislative obligations and guidance)
- recognising and respecting differences.

ClearView will protect a customer's right to privacy.

5. Linked Documents

- [ClearView Customers Experiencing Vulnerability Guide](#)
- [ClearView Customers Experiencing Vulnerability Toolkit](#)
- [Australian Infographic](#)
- [ClearView Values and Behaviours Graphic](#)
- Privacy Policy

6. External support services

There are a range of external support services that may be useful to our customers. If appropriate, you should consider sharing them. Examples include:

Organisation	Contact details
Family/Domestic violence or family law	
White Ribbon (Women)	whiteribbon.org.au/
Family Violence 1800Respect	1800 737 732
Mental Health	
Lifeline	lifeline.org.au 13 11 14
Black dog institute	blackdoginstitute.org.au
Beyond Blue	beyondblue.org.au 1300 22 4636
Suicide Call Back Service	suicidecallbackservice.org.au/
QLife (LGBTIQ)	qlife.org.au/ 1800 184 527
Legal Services	
National Legal Aid	nationallegalaid.org/
Community Legal Centre	clcs.org.au/
Women's Legal Services Australia	wlsa.org.au/
Indigenous Support Services	
Services Australia	servicesaustralia.gov.au/individuals/indigenous-australians
Well Mob	wellmob.org.au
Mob Strong Debt Help	financialrights.org.au/mob-strong-debt-help/
Translator and Interpreters	
National Relay Service	communications.gov.au
Translation and Interpreter Services	tisonational.gov.au
Older people	
Elder abuse hotline	1800elderhelp eapu.com.au/helpline
Financial Services	
Gambler's Help	gamblershelp.com.au
National Debt Helpline	ndh.org.au/
SuperFriend	superfriend.com.au/
Welfare Rights Centre (Centrelink Issues)	welfare-rights-centre.org.au/
Money Smart	moneysmart.gov.au/

ATO early release of super

[ATO early release of super – compassionate grounds](#)

7. Family Violence Policy

The Life Insurance Code of Practice was revised, and the new version takes effect on 1 July 2023. As a Subscriber, ClearView is required to have a policy which explains how ClearView will support customers who are experiencing family violence. The Family Violence Policy must be published on ClearView's website (The ClearView's Family Violence Policy). This Policy is a sub-section of the ClearView Customers Experiencing Vulnerability Policy. The obligations within the ClearView Customers Experiencing Vulnerability Policy apply to the Clearview Family Violence Policy.

Definition

Under the Family Law Act 1975 (s4AB), family violence means:

'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.'

It can include (but is not limited to):

- an assault;
- a sexual assault or other sexually abusive behaviour;
- stalking;
- repeated derogatory taunts;
- intentional damage or destruction of property;
- intentionally causing the death or injury to an animal;
- unreasonably denying the family member financial autonomy or withholding financial support needed for reasonable living expenses;
- preventing the family member from making and/or keeping connections with their family, friends or culture;
- deprivation of liberty.

ClearView is committed to:

- ensuring the fair, empathetic and sensitive treatment of customers affected by family violence;
- ensuring that decisions made consider the safety of the customer and their family;
- providing support to staff members who may deal with sensitive cases including relevant training and access to support services such as the employee assistance programs;
- publishing the ClearView Family Violence Policy on our website;
- ensuring that our external partners, where relevant, are contractually required to meet the provisions of the Life Insurance Code of Practice.

When dealing with a customer or family member of a customer who is affected by family violence, ClearView will endeavour to:

- take additional care in our dealings with customers affected by family violence;
- ensure that all information is treated with utmost confidentiality;
- understand the safest methods to communicate with the customer and ensure that this is recorded on the customer's file. This may include how and whether communications need to include third parties such as a counsellor, lawyer, legal aid or other specialist supporting the customer and how and when to communicate by phone;
- understand that customers affected by family violence may not have access to all their records including access to email and telephone accounts, and work with them to identify other means of obtaining any information required by us;
- ask whether the customer is experiencing financial difficulty and offer solutions, where possible, to support them;
- minimise the need for repeated disclosure of the customer's situation;
- adjust our usual requirements where possible if required;
- provide information on support services where appropriate.

- The application of the items above will vary according to the needs of the customer.

8. Appendix 1: Causes and triggers of vulnerability.

Life events or challenges that may increase the likelihood of a customer experiencing vulnerability can include:

- accident or illness or physical disability;
- mental health problems;
- experiencing a natural disaster, pandemic or other crisis event;
- family or domestic violence;
- change in family circumstances or relationships;
- low income, financial stress, job loss;
- recent bereavement;
- caring for someone experiencing any of the above circumstances.

Personal, cultural, and social characteristics that may lead to a higher likelihood of a customer experiencing vulnerability include:

- intellectual, mental, physical, neurological, or learning disabilities;
- living in remote areas;
- poor reading writing or numerical skills;
- diverse cultural backgrounds, assumptions, and attitudes;
- having a first language other than English.

9. Appendix 2: Family Violence Website Information.

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