

Customers Experiencing Vulnerability Policy & Guidelines

1. At a glance

Who	This policy applies to all Australian/New Zealand/Australasia employees.
What	<p>This policy sets out how we deal with, and the support available to:</p> <p>This policy sets out how we deal with, and the support available to:</p> <ul style="list-style-type: none">• Resolution Life customers who are experiencing Vulnerability, and• Resolution Life staff who are aware of a customer experiencing Vulnerability. <p>For the purposes of this policy, 'customer' means an individual insured, a third-party beneficiary, a potential customer, or an individual an insurer is seeking to recover money from.</p>
Why	<p>This policy is intended to support the ongoing safety and wellbeing of Resolution Life customers who may be experiencing Vulnerability and need special care or additional assistance. The outcome is that customers should feel that they can share with Resolution Life Australasia, challenges or personal circumstances they may be experiencing and feel confident that they will be treated with sensitivity, respect and compassion and that special care or additional assistance will be provided by Resolution Life Australasia when it is needed.</p>

2. Policy

Who is considered a vulnerable customer?

Resolution Life Australasia, a member of the Resolution Life Group, recognises that some of our customers may have unique needs and require additional support when engaging with us. Some of the reasons that customers may need additional support include (but are not limited to) the following:

- non-English speaking backgrounds may require language / translation assistance
- living in remote or regional communities and have difficulty in accessing medical services / amenities
- elderly and may have physical or psychological limitations
- disability including sight or hearing impaired
- experiencing domestic or family violence
- low literacy, numeracy and financial capability skills
- low income and/or high debt
- support in meeting identification requirements
- physical or mental disability
- severe or long-term illness
- mental illness
- significant change in circumstances
- unusual or sudden changes to account or relationship authorities or transactions
- non-standard requirements or credit history
- caring responsibilities (including operating a power of attorney)
- digital exclusion
- compromised data or victims of scams

2.1 Policy Principles

Resolution Life is committed to the safety and wellbeing of its customers. We will ensure the fair and sensitive treatment of customers experiencing vulnerability and ensure that any decisions made consider the safety of the customer.

This Policy applies to all Customers and all Resolution Life Australasia entities must comply with this Policy and the relevant Resolution Life Australasia entity processes and procedures. This Policy does not apply to dealings with customers of Resolution Life Australasia who are not real persons. We are committed to taking extra care with customers who experience vulnerability. We recognise 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.

Vulnerability has many forms. It can be caused by long-term circumstances such as a disability or short-term circumstances such as job loss. It can be sudden, such as the diagnosis of serious illness, or gradual, like the onset of dementia. One type of Vulnerability may lead to a cascade of others.

An additional factor is that Vulnerability may not be specifically disclosed by Customers. Reasons for this may include that some individuals may struggle to identify their own Vulnerability, while other individuals may be reluctant to provide personal information because they feel there is nothing to be gained by disclosing it, or they fear negative repercussions from disclosure.

Customers exhibiting certain indicators are more likely to be experiencing Vulnerability and need special care or additional assistance. This additional assistance should not take extended timeframes to provide as some vulnerabilities cause issues needing prompt attention. Resolution Life Australasia staff will be alert to these indicators in their interactions with Customers.

Resolution Life will:

2.4.1. Provide staff with appropriate ongoing training who may need to deal with sensitive matters and will support staff who are dealing with vulnerable so that staff:

- a. Are aware of customers experiencing vulnerability policy and related guidelines and procedures.
- b. Can identify potentially vulnerable customers.
- c. Can deal appropriately and sensitively with vulnerable customers.
- d. Can apply the customers experiencing vulnerability policy, guidelines and procedures - relevant to their role in dealing with vulnerable customers.

2.4.2. Early recognition of customer experiencing vulnerability

- a. Encourage customers experiencing vulnerability to notify Resolution Life of that fact via the channels such as Call Centre, Resolution Life website and relevant correspondence.
- b. It can be difficult (particularly in phone interactions) to identify if a customer requires additional support. Resolution Life Australasia staff are encouraged to:
 - o Listen carefully to the customer – do they sound as though they are struggling with the interaction? Have they stated they are having difficulty understanding? Are they asking for help to understand?
 - o Listen for verbal cues (or written cues if live chat / email communication) – are they indicating that they need additional support? (e.g., requiring additional time to process information, not comprehending what is being said to them, indirectly stating they may need some help, or agreeing with everything you say even if not appropriate etc)
 - o Determine if it is appropriate to offer additional support and be respectful and considerate when offering this
 - o Include additional needs details as required and to check the important alerts within Resolution Life Australasia's customer's profile systems.

- Pay attention to how the person expresses themselves in written word and whether it reflects an understanding of English and an understanding of the concepts of the conversation – it may be better for the person to discuss their matter over the phone rather than in writing

2.4.3. Protect private and confidential information

- a. Ensure protection of private and confidential information of customers experiencing vulnerability
- b. Treat these matters as confidential and will only disclose relevant information on a 'need to know' basis, with a customer's consent, or otherwise only if required to by law or for the express purpose of safety and/or security.
- c. Is committed to providing customers who may be vulnerable with clarity on their rights in relation to their insurance, superannuation and investments and support pathways if required.

2.4.4. Minimise the need for customers to repeat disclosure

- a. Where reasonable, minimise the information that a customer is required to provide and the number of times a customer is required to disclose the same information, noting that they may not have access to their personal information, records, and documents.
- b. Where possible, provide customers with consistency in speaking to one staff member, or a single pathway of escalation.
- c. Engage with the customer to discuss and agree safe ways to communicate and record these communication methods on the customer's file.

2.4.5. Identification

If customers need support to meet identification requirements, then we 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. Our approach to supporting customers with verification and identification will be flexible.

Resolution Life Australasia customer service staff will continue to follow their relevant procedure when initially requesting proof of identity from a customer.

2.4.6. Access to financial hardship help

- a. Will take additional care when dealing with customers experiencing vulnerability and refer customers to financial hardship support in connection with the provision of insurance, superannuation, and investment services, where reasonable.
- b. Where possible, minimise the information and documents that customers are required to provide.
- c. If the customer is experiencing vulnerability, provide options for the customer to retain their policy if they say they cannot pay their premiums.
- d. Ask a customer who self-identifies or a customer who is demonstrating potential signs of being vulnerable what their financial situation is, to determine whether they are also experiencing financial hardship and help arrange access to financial hardship support.
- e. If the customer is experiencing vulnerability, enable the Financial Hardship request to be fast tracked.

2.4.7. Support for our customers with additional needs

Resolution Life Australasia staff will use the following information to determine how they can support a customer with additional needs. Support can be offered by an appropriate Resolution Life Australasia staff member at any time during an interaction with a customer. Resolution Life

Australasia staff should remember to be sensitive when offering additional support. If you tell us, or we identify, that due to a vulnerability you need additional support or assistance, we will work with you and try to find a suitable, sensitive and compassionate way for us to proceed. We will do this as early as practicable, and we will protect your right to privacy

2.4.8. Communication barriers

English as a second language

Resolution Life Australasia aim to provide fair, accessible, responsive services, and provide an interpreter to facilitate communication wherever necessary. This includes whenever an interpreter is requested by a customer, or whenever employees need an interpreter to communicate effectively formally or informally with a customer.

Hearing impairment

Many hearing-impaired customers use a relay service for most interactions they have over the phone. Resolution Life Australasia staff may receive calls from customers where the relay service is already involved and ready to assist. This is the more common scenario.

Customers who are having difficulty hearing or understanding a telephone conversation can be offered the services of the National Relay Service or NZ Relay.

A link to their services can be found here:

<http://relayservice.gov.au>

<https://www.nzrelay.co.nz>

The following options used by the relay service will be accepted by Resolution Life Australasia when using:

- TTY/ Voice Text Telephone; or
- Speak and Listen; or
- Internet relay.

The Customer can also nominate to communicate by email or in writing by post.

Sight impairment

Some of Resolution Life Australasia's customers may have sight impairments and require additional support with written communications.

When assisting a customer, Resolution Life Australasia employees should be flexible to the customers' needs where possible Resolution Life Australasia

- Take information over the phone, read it back to the Customer to confirm its accuracy, and file note the conversation
- Assist customers by asking about how we can best provide information to them.
- Speak in your usual voice and try to avoid words such as 'look' and 'see'.

Communication difficulties

Some of Resolution Life Australasia's customers may experience communication difficulties.

Communication difficulties may include speech that is unclear, quiet or slurred and may be a result of Parkinson's, Multiple Sclerosis (MS), or Aphasia (Aphasia is developed by stroke victims or victims of other brain issues such as brain injuries) and impacts both receptive language (understanding what others are saying) and expressive language (spoken language) as well as reading / writing. Note that customers may have other reasons as to why they experience communication difficulties.

If a customer is experiencing communication difficulties, Resolution Life Australasia staff are requested to:

- Speak in a quiet environment and listen carefully to what the customer is saying
- Speak clearly and provide appropriate time for the customer to start speaking (i.e., try not to accidentally talk over them)
- Paraphrase back to the customer what they have said to ensure understanding on both sides
- If appropriate, offer the customer the opportunity to send their request in writing (including email if preferred). In written responses, use visuals (for example, diagrams) as well as words.

Living in remote and regional locations

Some of Resolution Life Australasia's customers live in remote or regional locations. This may mean that Resolution Life Australasia staff need to be considerate and flexible when engaging with these customers. For example, if a customer is requested to provide documents to us, ensure that the timeframe is appropriate to allow for a longer postal delivery.

For business areas that manage time-sensitive interactions with customers in remote locations (for example, Claims), please refer to procedures / guidelines for your business unit.

2.4.9. Community considerations

Elderly

For elderly customers that require additional support it is important that Resolution Life Australasia staff help them appropriately. Some simple ways to do so include:

- Speak slowly and clearly when communicating with them on the phone. Adjust your volume and tone of voice appropriately
- If you require actions to be completed by them, provide clear instructions as to what you need them to do. If appropriate, repeat instructions or confirmations for clarity
- Offer to send any instructions or information you have talked about via written mail or email (whichever is the customer's preferred mode of communication). This will allow the customer to reflect upon the discussion later with ease.

Domestic and family violence

Domestic and family violence (DFV) is a pattern of abusive behaviour in an intimate relationship or other type of family or domestic relationship where one person assumes a position of power and control over the other and causes confusion and fear. Domestic and family violence is a form of manipulation and coercive control.

DFV can impact the health, safety and wellbeing of Resolution Life Australasia's customers. Life insurance policies can be used by a perpetrator to control, frustrate or intimidate a victim. When communicating with a customer, employees should be aware of the signs that may indicate a customer affected by Domestic and Family Violence. When speaking to a customer that discloses DFV, it can be difficult to determine the right thing to say. Resolution Life Australasia has a Customer Domestic and Family Violence Policy, as well as a Customer Domestic and Family Violence Guideline, to support staff in assisting customers. Please refer to those documents for guidance.

Standards applicable to customers with Mental Health Conditions

Resolution Life Australasia adopts a respectful and positive approach towards customers with a past or current Mental Health Condition.

Where a Resolution Life Australasia employee becomes aware that a customer has a past or current Mental Health Condition, they should determine whether they are a Customer Experiencing Vulnerability and treat them accordingly.

Claims involving Mental Health Conditions must be processed sensitively, having regard to the customer's ongoing medical treatment needs, using the least intrusive methods of investigation. In Australia, claims must be handled in accordance with the claim investigation standards within the Life Insurance Code of Practice.

2.4.10. Support for Staff affected by supporting vulnerable customers

Provide support to Resolution Life staff affected by dealing with vulnerable customers through an employee assistance line, line management or human resources discussions, training, and the provision of resource documents.

2.2 Definitions

Vulnerability

A vulnerable customer is someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when a firm is not acting with appropriate levels of care.

Complaint

An expression of dissatisfaction made to or about Resolution Life, related to its products, services, staff or the handling of a Complaint, where a response or resolution is explicitly or implicitly expected or legally required.

3. More Information

3.1 Responsibilities

The roles and responsibilities about this Policy are set out below:

Employees	<ul style="list-style-type: none">• Understand and follow this policy. Specific responsibilities being:<ul style="list-style-type: none">○ Understand what information customers may access depending on their individual policy set-up as per BAU process and the guidelines associated and information that can be disclosed.○ Be able to provide details to support services if a customer (or an adviser on the customer's behalf) discloses that they are impacted by domestic and family violence.○ Inform your leader if a customer (or adviser on customer's behalf) discloses they are impacted by domestic and family violence.
Leaders	<ul style="list-style-type: none">• Provide support to employees who are dealing with a domestic and family violence situation with a customer by:<ul style="list-style-type: none">○ providing the appropriate training and coaching to adhere to this policy○ providing an escalation point as per business as usual (BAU)○ providing emotional support to the employee○ providing details on where they can access further support such as Employee Assistance Program (EAP)○ helping with rules around accessing information
Chapter Area Lead - Customer Experience	<ul style="list-style-type: none">• As Policy Owner:<ul style="list-style-type: none">○ communicate this Policy to wider business and ensure relevant Chapter Areas are updated so they can update their teams and processes.○ Ensure this policy remains current, complies with all regulatory requirements, and reflects changes as they occur.○ Review this Policy every year or upon significant legislative or industry change.○ Monitor adherence to this Policy and ensure appropriate controls are in place.

3.2 Compliance and consequence management

All employees are required to comply with this policy document. Any non-compliance may result in disciplinary action up to and including termination of employment in accordance with our Management of Conduct Policy.

Any instance of non-compliance should be treated in accordance with the Incident, Issues and Breach Management Policy and an incident logged in the relevant incident management system.

3.3 Resources and related policy documents

For further information please refer to CKB Policy Centre

[Policy Centre \(sharepoint.com\)](#)

For information, the below tables outline several community and life services available for customers and Resolution Life Australasia staff. These may be useful to consider when supporting a customer.

AU Community or Life services	AU Contact
Mental Health Services	
Beyond Blue	https://www.beyondblue.org.au/ 1300 22 4636
Black Dog Institute	https://www.blackdoginstitute.org.au/
Lifeline	https://www.lifeline.org.au/
	13 11 14
Suicide call back service	https://www.suicidecallbackservice.org.au/
	1300 659 467
Home Care & Services	
Dial-an-Angel	1300 721 111
Australian Home Care	https://ahcs.org.au
	1300 303 770
Carers Australia	http://www.carersaustralia.com.au/
	1800 242 636
Financial Counselling Services	
MoneySmart – ASIC website	https://moneysmart.gov.au/
	Contact Information: https://moneysmart.gov.au/contact-us
Social Work Services	
Department of Human Services	https://www.servicesaustralia.gov.au/
	Contact Information: https://www.servicesaustralia.gov.au/individuals/contact-us

NZ Community or Life services	
HEALTH AND WELLBEING	
Lifeline	0800 543 354 (0800 LIFELINE) A free community helpline (Lifeline 24/7, Suicide Crisis Helpline, Kidline) as well as a text support service HELP (4357)
Suicide Crisis Helpline	0508 828 865 (0508 TAUTOKO) Free, nationwide service available 24 hours a day, 7 days a week.
Depression and Anxiety Helpline	0800 111 757 or free text 4202
Samaritans	0800 726 666
SENIORS	
Seniorline	0800 725 463 A free information service for older people.
DOMESTIC AND FAMILY VIOLENCE	
Women's Refuge Crisisline	0800 733 843 (0800 REFUGE) For women living with violence, or in fear, in their relationship or family
Shine	0508 744 633 Confidential domestic abuse helpline-
Are You OK	0800 456 450 Family violence helpline
CHILDREN AND YOUNG ADULTS	
Youthline	Free call 0800 376633 Free text 234 email talk@youthline.co.nz or web chat from 7pm–10pm
Whatsup	Free call 0800 942 8787 for a confidential helpline for children and young people from 11am – 11pm.
FINANCIAL HARDSHIP	
Moneytalks	0800 345 123 A free and confidential helpline to provide free budgeting advice to individuals, family and whānau. Visit www.moneytalks.co.nz , email help@moneytalks.co.nz or txt 4029.
Gambling Helpline	0800 654 655
OTHER	
Emergency services	111
Citizens Advice Bureau	Available by freephone 0800 367 222
Alcohol and Drug Helpline	0800 787 797 or online chat
Quit Line	0800 778 778 Smoking cessation help

3.3.1 Document controls

Approved by	Chief Customer & Operating Officer - Paul Tarlinton
Policy owner	Chapter Area Lead - Customer Experience
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This Policy will be reviewed every year.