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# **Vulnerable Customers Policy**

**Prepared October 2020**

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## 1. Introduction

- 1.1** Youi is dedicated to treating all customers fairly and taking extra care with all customers and employees who are experiencing vulnerability. We recognise that a person's vulnerability can give rise to unique needs, and that their needs can change over time and in response to different situations.
- 1.2** A person's vulnerability may be due to a range of factors, such as:
- Age;
  - Disability;
  - Mental health conditions;
  - Physical health conditions;
  - Family violence;
  - Language barriers;
  - Literacy barriers;
  - Cultural background;
  - Aboriginal or Torres Strait Islander status;
  - Remote location; or
  - Financial distress.
- 1.3** The Code requires insurers to have internal policies and training in place to understand and support those experiencing vulnerability.
- 1.4** This is Youi's Vulnerable Customers Policy. This policy outlines the principles and minimum standards that must be followed to:
- Take reasonable steps to provide extra support to customers where vulnerability has been disclosed to or identified to us;
  - Foster a workplace culture where employees who are vulnerable feel supported in the workplace, contributing to a healthy and safe working environment for all.

## 2. Scope and Audience

- 2.1** This policy covers Youi Holdings Pty Ltd (ABN 41 124 972 425) ("**Company**"), an Authorised Non-Operating Holding Company on and from 1 March 2008 under section 18 of the Insurance Act 1973 and the Level 2 Head of the Youi Group comprising itself and its subsidiaries being:
- Youi Pty Ltd (ABN 79 123 074 733) ("**Youi**"), authorised to carry on insurance business in Australia on and from 1 March 2008 under Section 12 of the Insurance Act 1973;
  - Youi Properties Pty Ltd (ABN 604 123 873), a non-regulated subsidiary of Youi;
  - Youi NZ Pty Limited (CN 4476298) ("**Youi NZ**"), a non-regulated subsidiary, which provides call centre services to Youi; and
  - Youi Holdings Share Option Plan Managers Pty Ltd (ACN 131 122 908), a non-regulated subsidiary, which acts as trustee under a Trust Deed dated 30 May 2008 for purposes related to an employee share option plan established by the Company.
- ("Companies" or "Youi Group" in this policy means each of the Company and each subsidiary).
- 2.2** The local policy incorporates the group requirements of OUTsurance International Holdings Pty Ltd (Org No. 152 271 602, South Africa) ("OUTsurance"), which holds the majority of the shares in the Company. RMI Holdings Limited (Org No. 150 198 084, South Africa) is the ultimate holding company of the Company.
- 2.3** This policy applies to the Youi Group, and includes all Youi employees and contractors in all of Youi locations and to the extent it may be applied, to service providers.
- 2.4** It is important that all Youi employees ensure they understand what vulnerability is and the requirements of this policy.
- 2.5** Youi's values and expected risk underpin compliance behaviours and community expectations. Failing to comply may result in disciplinary action, including loss of performance payments and termination of employment.

## 3. Definitions

### 3.1 Terms and definitions

- Youi defines a vulnerable customer as:

Someone who, due to their personal circumstances, is especially susceptible to detriment.

- **“Code”** means the General Insurance Code of Practice 2020, as amended or replaced from time to time.
- **“Customer”** A person holding or enquiring about holding a Youi insurance product, an authorised person on a Youi insurance policy, or a person who is not insured with Youi but to whom the benefit of a Youi policy extends.
- **“Domestic and family violence” (DFV):**

Domestic violence means “violence, abuse, threatening or other behaviour between people who are currently, or have previously, been in an intimate relationship”. The perpetrator uses violence and abuse to control and dominate the other person. This causes fear, physical harm, and/or psychological harm.

Family violence means a person who exhibits “violent, threatening, or other behaviour by a person that coerces or controls a member of the person’s family or causes (them) to be fearful.”

DFV can take many forms, including but not limited to:

- economic (financial) abuse,
- emotional (psychological) abuse,
- physical and sexual abuse,
- technology-facilitated abuse,
- social abuse,
- spiritual abuse, and/or
- verbal abuse.

## 4. Policy Principles and Standards

These policy principles and standards are designed to act as a minimum standard for meeting Youi's obligations to support customers and employees who experience vulnerability.

### 4.1 PRINCIPLE 1: Identification of vulnerability

**4.1.1** Customer vulnerability is a state and does not define a customer. Customers experiencing vulnerability may have or be experiencing the following:

- Low financial literacy;
- Age-related impairment;
- Mental illness;
- Cognitive impairment;
- Scams and fraud;
- Culturally and linguistically diverse backgrounds;
- Financial abuse;
- Natural disasters;
- Serious illness;
- Loss of a loved one;
- An addiction or behavioural challenges;
- Disability;
- On low income;
- Low digital literacy;
- Live in a remote location; or
- Other circumstances causing significant detriment.

**4.1.2** This is not an all-encompassing list of what constitutes vulnerability and our employees should keep an open mind when interacting with our customers. Each customer is unique and the support we offer needs to be tailored, where possible, depending on their individual needs or circumstances.

**4.1.3** We encourage customers to tell us about their vulnerability so that we can work with them to arrange appropriate support.

### 4.2 PRINCIPLE 2: Disclosures of vulnerability

**4.2.1** We will handle all disclosures of vulnerability with sensitivity, compassion and respect.

**4.2.2** We will treat disclosures of vulnerability as sensitive personal information and to be kept confidential, except when the law requires disclosure.

- 4.2.3** We will work with the customer to find a suitable, sensitive and compassionate way to proceed as early as practicably possible.
- 4.2.4** Employees can make a disclosure of vulnerability to their direct manager, any Youi Executive Committee member or to Human Resources. Procedures must be in place for employees to discuss any issues relating to vulnerability.
- 4.2.5** Customers may make a disclosure of vulnerability to any Youi employee. Procedures must be in place for employees to know how to respond to these disclosures.
- 4.2.6** Customers may make a disclosure of vulnerability to any Youi service provider. Procedures should be in place for service providers to know how to respond to these disclosures.
- 4.2.7** If a customer identifies and discloses that they are a vulnerable person and requests additional information or services, employees are to refer them to external support agencies. These support agencies are outlined in relevant department processes.
- 4.2.8** If an employee or service provider believes a customer or employee or any other person is in immediate danger, the matter should be referred to the Police.

## **4.3 PRINCIPLE 3: Taking extra care of all vulnerable customers**

- 4.3.1** All vulnerable customers must be treated fairly, with dignity and compassion by employees.
- 4.3.2** Each customer is different and has individual needs. The first step is to check with the customer how they wish to proceed. We will inform customers of the options available to them and empower them to be able to choose the most appropriate help for them.
- 4.3.3** Customers who have disclosed they are vulnerable will be referred to the Priority Assistance Team for further support if required.
- 4.3.4** If the customer does not wish to, we will not require someone to explain their individual circumstances surrounding vulnerability more than once. The customer files will be flagged as being case managed, and if required, referred to the Priority Assistance Team.

- 4.3.5** If a customer is experiencing Financial Hardship or Domestic and Family Violence, please refer to these specific policies for additional support that may be provided.

## **4.4 PRINCIPLE 4: Taking reasonable steps to support customers who are affected by vulnerability**

- 4.4.1** We will take reasonable steps to support customers who are affected by vulnerability. As a minimum, support measures available to customers affected by vulnerability include:

- A dedicated phone number to the Priority Assistance Team who are trained in supporting vulnerable customers, including those affected by Domestic and Family Violence;
- Ability to nominate a support person (including a lawyer, consumer representative, interpreter or friend) to act on their behalf as an authorised person; and
- Financial hardship assistance.

- 4.4.** Other support options that may be considered to support customers affected by vulnerability include:

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- Referring customers to a financial counsellor or an appropriate community support service to make it easier for them to communicate with us.
- Please refer to the 'Extra Cover' section of the PDS for more information about additional support measures that may be covered under the customer's policy.

- 4.4.** If that additional support is from someone external to Youi such as a lawyer, consumer representative, interpreter or friend, we will recognise this and allow for it in reasonable ways, such as:

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- Updating authorised persons on the policy or claim on the customer's request to assist in their interactions with Youi;
- Applying Youi's processes and policies in a reasonable manner to recognise the authority of the support person; and
- If that additional support relates to meeting identification requirements, taking reasonable measures to assist the customer, particularly if they are from a non-English speaking background or an Aboriginal or Torres Strait Islander community.

- 4.4.** Where practicable, we will provide the customer with access to an interpreter if requested or if required to communicate effectively. Other support regarding using an interpreter includes:

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- Recording the use of an interpreter or, if Youi was not able to arrange one, recording the reasons why; or
- Providing a clear link on our website which contains information on interpreting services, teletypewriter services, translated product information and any other relevant information for people with language barriers.



- 4.4.** If the customer is clearly distressed, in immediate danger or suggesting they may harm themselves, our staff  
**5** should promptly take the following actions:

- Refer the matter to their Team Manager, and the matter should be considered for referral to the Police immediately;
- Refer to the relevant department process; or
- Record a Risk Incident in our internal Risk Register.

## **4.5 PRINCIPLE 5: Supporting Youi employees who are experiencing vulnerability**

- 4.5.1** We will not treat an employee adversely or badly because of their disclosure of, experience of, or perceived experience of vulnerability. An employee retains the right to raise any grievances to HR, as outlined in the Workplace Grievance policy.

- 4.5.2** Work performance of an employee may be impacted by vulnerability. If a disclosure has been made, it may be possible to discuss and, where appropriate and necessary, agree to additional support and reasonable role changes for some time. Role adjustment or support measures may include job redesign, change of duties, change to working hours or patterns of work. We may need to conduct regular reviews, a return to workplace or a performance improvement process.

- 4.5.3** We will provide support to employees who are experiencing any mental or physical health issues. As a minimum, employees affected can:

- Take paid or unpaid leave “sick leave” in accordance with Youi Leave Policies and the employee’s Employment Agreement;
- Request flexible working arrangements;
- Take paid or unpaid personal / carer’s leave, in certain circumstances; or
- Access support from the Employee Assistance Program (EAP).

- 4.5.** We will take measures to support an employee and when agreed will document, where appropriate.

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- 4.5.5** We will take reasonably practical steps to keep any information about an employee’s situation confidential.

## **4.6 PRINCIPLE 6: Training and awareness**

- 4.6.1** This policy and the related Domestic and Family Violence Policy is available internally to all our employees. Youi’s Domestic and Family Violence Policy is also published on Youi’s external website.

- 4.6.2** We will ensure that all employees are made aware of this policy, related policies, and where to find them in their induction process.

- 4.6.3** As a minimum, all employees are required to complete mandatory awareness training about understanding vulnerability, how this may affect a customer's needs and knowing the appropriate support measures, including referrals, that Youi has in place for both its customers and employees.
- 4.6.4** We will provide training for all employees who are likely to be involved in communications requiring an interpreter. These processes will also be stored in relevant departments' sites.
- 4.6.5** People managers will be provided guidance on how to recognise the signs of abuse and vulnerability, how to conduct conversations, how to treat the sensitive information confidentially and with respect, and where to direct employees for additional support, including both internal resources such as the EAP and external support agencies.
- 4.6.6** Youi has designated and accredited Mental Health First Aiders. These employees must complete tailored training in how to identify mental health early warning signs and are available to provide first line assistance to employees as required.
- 4.6.7** Youi's service providers must be made aware of who they are to inform within Youi if a disclosure from a customer about vulnerability is received. As a minimum, Youi's service providers must be made aware of the Domestic and Family Violence Policy on Youi's website.

## 5. Policy Governance Review

### 5.1 Policy Owner- Chief Operations Officer

- 5.1.1** The Policy Owner is responsible for ensuring the policy is maintained, including that it addresses relevant legal, regulatory and industry codes, and other key documents.
- 5.1.2** The Policy Owner manages the process for updating the policy in accordance with the review timing outlined in this policy, including providing a clear summary of the changes to the policy for the relevant Committee to approve.

### 5.2 Policy implementation

- 5.2.1** Senior Executives must establish, review and maintain appropriate operating processes and procedures to ensure this policy is implemented effectively across their business areas.

### 5.3 Policy exemptions

- 5.3.1** Policy exemptions may be granted where:
  - 5.3.1.1** *there is a legitimate reason for not meeting a principle or requirement of a policy; and*
  - 5.3.1.2** *the provision of such an exemption will not breach any legislative obligations.*
- 5.3.2** The Head of Compliance must review exemption requests, as a minimum.

### 5.4 Policy monitoring and assurance

- 5.4.1** Compliance will monitor and review compliance with this policy as a part of its overall compliance monitoring program.

### 5.5 Reporting

- 5.5.1** As a minimum, any identified issues or compliance incidents must be managed as per the requirements in Youi's Compliance Management Policy.
- 5.5.2** Internal management reporting and escalations must, as a minimum, follow requirements as outlined in Youi's Compliance Management Policy and Risk Management Policy to provide an appropriate level of senior management oversight.

## **5.6 Policy awareness and risk culture**

- 5.6.1** As a minimum, the policy must be available to employees.
- 5.6.2** Appropriate training or awareness programs must be in place to ensure that people who are in scope of this policy have the relevant skills and knowledge to understand and fulfil their obligations.
- 5.6.3** Ethical compliance behaviours and performance of people in scope of this policy are to be regularly reviewed. Appropriate education and communication around this policy will be used to support and enhance a strong risk culture and embed by Youi's values.

## **5.7 Policy breaches**

- 5.7.1** The Head of Compliance and General Counsel will complete an assessment to determine if the breach is a reportable breach.

## 6. Related Legislation and Documents

6.1 This policy aims to meet obligations from laws, regulations, guidelines and industry codes relevant to vulnerable customers including, but not limited to:

Jurisdiction	Mandate
Australia	<ul style="list-style-type: none"><li>• General Insurance Code of Practice 2020</li><li>• Fair Work Act 2009</li><li>• Privacy Act 1988</li></ul>
New Zealand	<ul style="list-style-type: none"><li>• Employment Relations Act 2000</li><li>• Human Rights Act 1993</li><li>• Privacy Act 1993</li></ul>
South Africa	<ul style="list-style-type: none"><li>• Protection of Personal Information Act 2013</li></ul>

## 7. Document Control

### 7.1 Identification and approval

Document Name (Id)	Vulnerable Customers Policy
Document Owner	Chief Operating Officer
Document Owner	Code of Practice Steering Committee

### 7.2 Approval history

Approved by	Version tabled	Version approved	Date approved
Code of Practice Steering Committee	1.0	1.0	21/10/20

## 8. Appendix A – Resources

- Beyond Blue / [www.beyondblue.org.au](http://www.beyondblue.org.au)
- 1800RESPECT / [1800RESPECT.org.au](http://1800RESPECT.org.au)
- QLife / [www.qlife.org.au](http://www qlife.org.au)
- Mensline / [www.mensline.org.au](http://www.mensline.org.au)