



# **GUIDANCE FOR VULNERABLE CUSTOMERS**

**Group**

## 1. Introduction

Throughout this Guidance, AUSCOAL Superannuation Pty Ltd is referred to as the **Trustee**, the Mine Superannuation Fund is referred to as the **Fund** and Mine Super Services Pty Ltd is referred to as **Mine Services**. When collectively referring to Trustee, Fund and Mine Services we use the terms '**Group**', '**we**', '**our**' or '**us**'.

The purpose of this Guidance is to outline the Group's understanding of its members/clients (**customers**) experiencing vulnerability, whether identified or not by them, and the actions we will take to provide services in an supportive environment taking into account individual circumstances and requirements.

This Guidance is designed to assist in the identification of vulnerable customers. This supports the Group and relevant service providers to recognise the need for additional support required by customers are identified or who self-identify as being vulnerable. This Guidance also aims to support vulnerable customers by:

- a) advocating for respect and inclusivity;
- b) providing an empathetic, well-defined, systematic approach to assisting vulnerable customers;
- c) assisting the proactive identification of vulnerable customers and minimising the reliance on self-identification by the customers themselves;
- d) encouraging and supporting a culture of support, protection, and accountability;
- e) outlining how we will provide support to vulnerable customers to the best of the our ability rather than through an ad hoc approach;
- f) empowering vulnerable customers to be confident in the decisions they make because they can access and understand information they need to make decisions; and
- g) helping guide staff training requirements.

## 2. Principles for supporting our vulnerable customers

We recognise that people identify differently because of their experience, circumstance, attributes, characteristics or preferences. None of these differences should prevent an individual from being empowered to manage and access products and services, money held in a superannuation fund or other investment or any insurance benefit they hold.

This Guidance recognises that many vulnerable customers require dedicated and professional support when interacting with us. We have adopted a flexible approach when the identifying and assisting vulnerable customers. We recognise that:

- many people will experience vulnerability, in some form and in some period, during their lifetime;
- the impacts of vulnerability can be experienced differently by different people;
- when this arises, people's needs may change or be exacerbated;
- vulnerable customers are entitled to respect, empathy, courtesy and fairness;
- we should listen to our customers stories and try to 'walk in their shoes' in order to understand their circumstances and needs;
- our customers who have unique needs or experience vulnerability may require additional support when interacting with us;
- talking about personal vulnerabilities takes courage and strength. Some peoples' vulnerabilities can make communication difficult, as well as the person feeling shame and embarrassment;

- the impact of vulnerability is strong. People can often be trying to cope with limited time, energy, and resources in a high stress environment. Their thinking may also be impacted as their priorities are elsewhere;
- we cannot solve all vulnerable customers' problems. However, we have an important role to play in supporting customers experiencing vulnerability. This may include referring the customer to an external service provider with specialist training or experience to appropriately engage with and support the customer with their needs; and
- we can help make a positive difference to vulnerable customers by:
  - being sensitive, showing compassion and being empathetic;
  - looking out for red flags and noticing when something doesn't seem right;
  - being understanding and taking action to provide support;
  - guiding vulnerable customers towards other sources of support where possible.

### 3. Definition of Vulnerable Customer and Disability

We define vulnerability as a personal circumstance where a person is exposed to or susceptible to harm or loss. Customer vulnerability may apply only in the immediate time frame or in the medium or longer term and does not permanently define a customer. In this definition, we focus on the circumstance likely to give rise to vulnerability and not the 'type' of person.

We consider that the following circumstances may create a vulnerable customer risk:

- a person is experiencing family violence or financial abuse and/or distress. Family violence is defined as violence between family members, typically where the perpetrator exercises power and control over another person.
- a person has a serious or terminal illness;
- a person is experiencing financial distress;
- a person is experiencing homelessness or appears to have no fixed address;
- a person has circumstances where a delay in addressing their issue or query (including a complaint) could adversely affect their basic living conditions;
- a person is of Aboriginal or Torres Strait Islander status;
- a person is young in age (their financial literacy and experience may often be lower and their susceptibility to fraud and risk of being taken advantage of may be higher);
- a person is older in age (their use of technology may be low or restricted, they may have an age related disability or they may be socially isolated);
- a person is elderly (they may suffer from elder neglect, elder emotional or psychological or financial abuse);
- a person has a disability\*;
- a person has a low level of literacy including financial literacy;
- a person experiences a natural disaster;
- a person is isolated or lives in a remote or regional community;
- a person is incarcerated;
- a person has a non-English speaking background.

\* In recognising vulnerable customers with a disability, we define a disability, in accordance with the Disability Discrimination Act 1992 (Cth), to be an impairment or condition which impacts daily activities, communication and/or mobility and has lasted or is likely to last six months or more.

The breadth of impairments and medical conditions covered by the Disability Discrimination Act 1992 (Cth) are:

- Physical – affecting a person's mobility or dexterity;

- Intellectual – affecting a person’s abilities to learn;
- Mental Illness – affecting a person’s thinking processes;
- Sensory – affecting a person’s ability to hear or see;
- Neurological – affecting the person’s brain and central nervous system;
- Learning disability;
- Physical disfigurement; or
- Immunological – the presence of organisms causing disease in the body.

We recognise that disability can be visible or non-visible, inherited or acquired (due to illness or injury) and can be temporary or permanent.

#### **4. Basic principles for supporting our customers**

##### *Empathy and Understanding*

We will provide support to our customers with authenticity, empathy and understanding. In respect of vulnerable customers, we aim to provide them with trust and confidence to disclose their situation to us. This will then enable us to identify and facilitate the support needed.

We recognise that vulnerability doesn’t only affect our customers, it also impacts our employees. We provide support to our staff who are interacting with vulnerable customers or experiencing vulnerability themselves through our Employee Assistance Programs and other mechanisms facilitated by our People team. We encourage our Fund Administrator to do the same.

##### *Communications style including for the visually impaired*

To ensure inclusivity of communication we will write our content clearly and for a diverse audience. Where possible we will make content available in an alternative format on request (for example in large font).

To assist customers who have visual impairment, wherever possible we will use appropriate font styles and sizes and design our written and online communications to maximise readability.

We encourage the use of several screen reader software applications available that convert on-screen text to speech. This includes free online applications, such as NVDA (NonVisual Desktop Access) for Microsoft Windows which can be downloaded to your computer.

##### *Identifying Support Needs*

If a person is identified as a vulnerable customer we will review additional support or assistance requirements, and where appropriate, we will discuss this with them. We will prioritise their requirements and attempt to provide assistance we are reasonably able to and to the best of our ability.

##### *Permission to document support needs*

We will ask the vulnerable customer for permission to keep a record of the support or assistance required so that this can be referenced in the future to support the person if needed.

### *Working with the customers support person/representative*

If a vulnerable customer requires additional support from a representative we will recognise this and allow for it in all reasonable ways after receiving permission from the vulnerable customer for this to occur. This will be undertaken within the boundaries of our legal obligations to our customer. Further details of requirements and who is a 'representative' are outlined in Section 6.

### *Escalating support requirements - internal and external*

Depending on the nature of the customer's circumstances we may escalate the customer's enquiry, contact or request to a senior staff member to help provide or facilitate the assistance required. We may also, with the permission of the customer, contact or refer the customer to an appropriate external service provider with expertise applicable to their circumstance in order to assist the customer further. The types of external services we may use for this purpose are outlined in Section 7.

## **5. Making it easier for our customers**

### **Extending Timeframes for Document Submissions and Insurance Claims**

Vulnerable customers living in isolation and/or remote and regional communities may have trouble meeting their obligations to provide us with documents and to take part in assessments (for example medical appointments) within the timeframes we set. We will work with these customers to implement appropriate arrangements including extending timeframes and working with the Fund's insurer to extend timeframes (if relevant) in respect of an insurance claim where possible.

### **Meeting identification requirements**

Some vulnerable customers may require support meeting identification requirements which are necessary for certain transactions. We will take a flexible approach to these requirements in line with our legal obligations (for example using alternative customer identification methods), while continuing to comply with our obligations under the law.

### **Difficulties having documents witnessed**

If a vulnerable customer has difficulties having documents witnessed, which are needed to complete a transaction, we will, where possible, facilitate an electronic document witnessing service which meets the requirements of law for witnessing documents.

### **Difficulties engaging with the Mine Group on insurance claims**

Insurance claims can be difficult to work through particularly where the claims are complex. We will assist or arrange for the Fund's insurer to assist vulnerable customers to understand our and/or the insurer's requirements, complete claims forms, understand and meet other requirements and collect reports including obtaining medical reports (where possible).

### **Illness**

If a customer is unable to engage with us due to a significant illness or injury, hospitalisation or for other reasons, and that customer wishes to appoint a representative to liaise with the Mine Group, we will work with the customer to have the representative authorised for this purpose. This will include (where necessary) contacting the customer to discuss authorisation requirements and the representative to discuss the range of activities they are and are not authorised to undertake on behalf of the customer.

**Low level literacy**

A customer may have a low level of literacy in reading, writing or numeracy. Respectful of this, we will aim to write all content in plain English targeted at an appropriate level of literacy to meet the needs of our customers.

Where a customer is identified as having difficulty understanding our communications we will work through the content with them, explain what it means and how it may apply to their circumstances taking into account our legal obligations on the provision of financial advice services. If we identify that the customer may need financial advice, we will, with the permission of the customer, refer the customer to our financial advice team for additional support.

If we operate an office which is close to the customer's residential location, we may arrange to meet the customer face to face to provide further support.

**Low financial literacy**

If we identify that a customer has a low level of financial literacy and is having difficulty understanding the information we have provided to them and how it applies we will contact the customer to talk through the information with them, explain what it means and how it may apply to their circumstances taking into account our obligations on the provision of financial advice services. If we identify that the customer may need financial advice, we will, with the permission of the customer, refer the customer to our financial advice team for additional support.

**English as a second language**

If a customer requires the assistance of an interpreter, we will on request provide access to an interpreter so that we can communicate effectively with the customer. We may choose to use a member of staff if that option is available for this purpose. If that staff member is unable to communicate effectively with the customer or there is no staff member who can assist the customer in their nominated language, we will then seek the services of an external interpreter who speaks the language nominated by the customer. Our preferred interpreter service provider is outlined in Section 6.

**Customer under a guardianship, administrator or power of attorney arrangement**

If a customer is under the care of an appointed guardian, administrator or a person who holds an enduring power of attorney in respect of the customer, provided we are satisfied that we can continue to meet our legal obligations to the customer we will communicate directly with the guardian, administrator or the person who holds the enduring power of attorney and/or the customer as appropriate or directed through the written arrangement and accept payment instruction from them. We will seek evidence of the arrangement in writing and then honour that arrangement.

**Natural disaster support**

Natural disasters and catastrophic events in Australia can include heatwaves, bushfires, droughts, floods, severe storms and tropical cyclones, earthquakes, pandemics, tsunamis and landslides. Where a natural disaster occurs, we will implement procedures to assist customers who may be vulnerable during that time or as a result of that event,

including using any of the processes outlined in this guidance document to assist our customers. We will prioritise enquiries and transactions in these circumstances, particularly those that will provide financial support to impacted customers and will make information available on our website to guide customers through this period.

**Age appropriate support**

Very young customers and older/elderly customers may be more susceptible to scams and fraud for many reasons including an overly trusting approach.

Young customers may also have low financial literacy due to inexperience. When contacted by young customers we will ensure they understand their enquiries, the information we are providing them and the impact the transactions they are requesting will have on them.

We will include a focus on identifying red flags that may indicate that they are being scammed, defrauded or influenced by others in their interactions and requests. Where a red flag is identified, actions taken to support the young customer may include speaking to them via telephone to validate a request, flagging their record or delaying a transaction until we are satisfied that the request is not being made under duress.

In respect of our older customers (generally considered to be 65 and over), if we identify that they have difficulty accessing information and online forms we will make these documents available via an alternative method such as in hard copy and/or via post. In supporting these customers we will include a focus on identifying red flags that may indicate that they are having difficulty with our processes and requirements or being scammed or defrauded so that we can provide additional support. This may include walking them through forms and requirements, helping them to complete forms, referring them to our financial advice team where appropriate and providing them with additional information.

In respect of our older and 'elder' customers we recognise the risk of elder neglect, elder emotional or psychological abuse and elder financial abuse. Elder financial abuse is defined as the mismanagement or improper use of an older person's finances.

Whilst not all customers in this age group face these risks and many retain their independence and are highly capable, we will be alert to red flags that may indicate that these scenarios may be applicable to the customer. If a red flag is identified actions taken to support the customer may include speaking to them via telephone to discuss their needs further, flagging their record, delaying a transaction until we are satisfied that the request is not being made fraudulently, subject to a scam or under duress.

**Support in lodging a complaint**

All customers are able to submit a complaint or raise dissatisfaction, receive ongoing updates about the management of their complaint raised and receive reasons and support in respect of the final decision.

Our **Complaints Management Policy and Public Guidance** document sets out the processes and timeframes in which we will manage complaints.

In the complaints management process, we will ensure vulnerable customers have reasonable and equitable access to the complaints process, including in relation to the decisions and/or conduct of any of our services providers. Complaints from vulnerable customers will be escalated and resolved as quickly as possible.

We recognise that where a complaint relates to the release of monies from the Fund, escalating the complaint can assist in relieving financial stress if the complaint is upheld and payment is approved.

We also recognise that where the complaint is in relation to an insurance claim, early intervention may help to escalate a claim decision and where the claim is approved, to make payment to be customer.

In relation to any legal proceedings or actions that we have advised the customer we may take, we recognise that escalated management and resolution of the complaint may help to resolve matters before these actions are necessary. Where appropriate, we will defer any actions that we may need to take until the complaint has been resolved.

## 6. Appointing a representative

Customers are able to appoint a representative to assist them and to represent them on matters related to the Mine Group and its products and services. We will only deal with representatives who are properly authorised by you in order to protect your privacy and to meet our privacy obligations to you.

Examples of representatives who we may deal with include (but is not limited to):

- a person appointed as your guardian, administrator or a person who holds an enduring power of attorney in respect of you;
- a family member, relative or friend;
- a financial adviser or financial counsellor;
- a legal representative;
- an accountant;
- a member of parliament;
- a person who acts as a representative under a commercial (fee-charging) arrangement with you.

Our [‘Authority to Access Information’](#) form can be used for this purpose.

When appointing a representative we recommend you consider the following key points before making the representative appointment:

- the person will always act in your best interests;
- the person will not have a conflict of interest by having a financial interest in the matter, for example if the matter relates to a complaint, benefit withdrawal or insurance claim;
- the person has the time available to deal with the issue on your behalf;



- if you enter into a fee charging arrangement with the person (if you are using a professional service provider specialising in this type of service), you are satisfied that the fees are properly explained, reasonable for the services required and that they have the expertise to undertake the role required of them for you.

If we have concerns when dealing with your representative, for example that they may not be acting in your best interests or they are not cooperative, we may decide to contact you to discuss this with you. If we are unable to resolve our concerns, we may decline to deal with your representative and instead deal directly with you until you appoint an alternative representative.

## 7. External Support Services

Shown below are some of the support services that we may access ourselves or refer a vulnerable customer to, to help meet their needs. We may use other support services we identify from time to time or that customers refer us to.

Aboriginal and Torres Strait Islander Support Services		
<b>13Yarn</b>	A free and confidential counselling service run for, and by, Aboriginal and Torres Strait Islander People	13 92 76
<b>First Nations Foundation</b>	Indigenous financial wellbeing foundation providing financial education, training and information, including support to reconnect indigenous peoples with their superannuation.	<a href="https://firstnationsfoundation.org.au/">https://firstnationsfoundation.org.au/</a>
<b>Mob Strong, Debt Help</b>	This is part of the Financial Rights Legal Centre. The service is a free legal advice service about money matters for Aboriginal and Torres Strait Islander people from anywhere in Australia.	1800 808 488 <a href="https://financialrights.org.au/getting-help/mob-strong-debt-help/">https://financialrights.org.au/getting-help/mob-strong-debt-help/</a>
Disability Support Services		
<b>Disability Services Australia</b>	A government service providing assistance with: <ul style="list-style-type: none"> <li>• living independently;</li> <li>• improving relationships;</li> <li>• find employment;</li> <li>• connecting socially;</li> <li>• training courses to enhance career opportunities; and</li> <li>• support for behaviour therapy, psychological assessments and therapy, speech pathology and occupational therapy.</li> </ul>	<a href="https://dsa.org.au/services/">https://dsa.org.au/services/</a>
<b>National Relay Service</b>	Provides support to people who are deaf and/or find it hard hearing or speaking with people who use a phone. Depending on the type of call a Relay Officer will change voice to text or text to voice and AUSLAN to English or English to AUSLAN.	<a href="https://www.communications.gov.au/what-we-do/phone/services-people-disability/accesshub/national-relay-service">https://www.communications.gov.au/what-we-do/phone/services-people-disability/accesshub/national-relay-service</a>

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A person wanting to use the National Relay Service will need to register as a NRS user.

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### Employer Support Services

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#### Mental Health At Work

Provides a full spectrum of mental health services for workplaces.

<https://www.mhatwork.com.au/>

#### SuperFriend

Works with industry partners to:

- help organisation navigate their workplace wellbeing journey with strategic support, workplace training and resource solutions;
- advocating for policy, regulation and workplace system change; and
- providing insights to industry government and workplaces.

<https://www.superfriend.com.au/>

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### Family and Domestic Violence Support

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#### 1800 RESPECT (family violence counselling)

A national, confidential domestic, family and sexual violence counselling, information and support service.

1800 737 732

<https://1800respect.org.au>

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### Financial Support Services

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#### ASIC MoneySmart

This online government service provides financial guidance including tips on managing money, borrowing and credit, insurance, superannuation, investing, scams and more.

<https://moneysmart.gov.au>

#### National Debt Helpline

A free professional confidential and independent financial counselling service. They are not a lender and do not sell anything or make money from the people that use the service.

1800 007 007 (9:30am to 4:30 pm Monday to Friday)

The website provides step by step information on how to manage different types of debt and includes information on complex situations such as domestic and family violence and financial abuse, natural disasters, mental health and prison.

<https://ndh.org.au/>

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### Language Support Services

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#### Auslan Signbank

A language resource for Australian Sign Language.

Available resources include:

- a dictionary;
- ability to search for signs related to medical and health topics;
- ability to search for signs related to education and teaching topics;

<https://www.auslan.org.au/>

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	<ul style="list-style-type: none"> <li>• videos of deaf people using the listed Auslan signs;</li> <li>• information on the deaf community in Australia; and</li> <li>• links to Auslan classes.</li> </ul>	
<b>Translating and Interpreting Service (TIS National)</b>	<p>TIS National is an interpreting service provided for people who do not speak English and for agencies and businesses that need to communicate with their non-English speaking clients.</p> <p>They provide:</p> <ul style="list-style-type: none"> <li>• immediate phone interpreting</li> <li>• ATIS automated voice-prompted immediate phone interpreting</li> <li>• pre-booked phone interpreting</li> <li>• video remote interpreting</li> <li>• on-site interpreting</li> </ul> <p>Additionally they provide free document translations for people settling permanently in Australia to support participation in employment, education and community engagement.</p> <p>Permanent residents and select temporary or provisional visa holders are able to have up to ten eligible documents translated into English within the first two years of their eligible visa grant date.</p>	<p><a href="https://www.tisnational.gov.au/">https://www.tisnational.gov.au/</a></p> <p>131 450</p> <p>The TIS National immediate phone interpreting service is available 24/7 for the costs of a local call for any person or organisation in Australia who needs an interpreter.</p>
<b>Legal Support Services</b>		
<b>Economic Justice Australia</b>	<p>Members of Economic Justice Australia are specialist community legal centres that provide free advice on issues like appealing a Centrelink decision, Centrelink debts, difficulties applying for a Disability Support Pension, Compensation Preclusion Periods and more</p>	<p><a href="https://www.ejaustralia.org.au/legal-help-centrelink/">https://www.ejaustralia.org.au/legal-help-centrelink/</a></p>
<b>Community based legal centres</b>	<p>Services include specialised legal advice, advocacy and counselling in financial services, particularly consumer credit, banking and debt recovery.</p>	<p><a href="https://clcs.org.au">https://clcs.org.au</a>. This will take you to a national site where you can access their locator function to identify a legal resource in your state.</p>
<b>Legal Aid Commissions</b>	<p>These are state based and provide services to disadvantaged clients in many areas of criminal, family and civil law, including free, confidential face-to-face legal advice and legal representation for eligible clients.</p>	<p>Each state has its own Commission. These can be accessed via the link below at the bottom of the page.</p> <p><a href="https://www.legalaidact.org.au/about-us/legal-services/legal-aid-in-australia">https://www.legalaidact.org.au/about-us/legal-services/legal-aid-in-australia</a></p>

## Crisis and Mental Health Support

	A mental health organisation focused on supporting people affected by anxiety, depression and suicide.	
<b>Beyond Blue</b>	<p>The website offers:</p> <ul style="list-style-type: none"><li>• metal health check-ins;</li><li>• support finding a mental health professional; and</li><li>• articles and information about mental health.</li></ul>	<p>1300 224 636</p> <p><a href="http://www.beyondblue.org.au">www.beyondblue.org.au</a></p>
<b>Black Dog Institute</b>	<p>The website offers resources and digital tools such as:</p> <ul style="list-style-type: none"><li>• self help programs;</li><li>• mental health personal assessments tools;</li><li>• anxiety, depression and bipolar self tests;</li><li>• factsheets; and</li><li>• finding support groups (both online and in person).</li></ul>	<p><a href="http://www.blackdoginstitute.org.au">www.blackdoginstitute.org.au</a></p>
<b>Gambling Help Online</b>	<p>The service offers:</p> <ul style="list-style-type: none"><li>• free 24/7 chat and email counselling and support services;</li><li>• professional counsellors with expertise in problem gambling and online services;</li><li>• a stepping stone for further help-seeking, including telephone and face to face gambling services; and</li><li>• extensive website content, self help information and weblinks for additional support.</li></ul>	<p><a href="tel:1800858858">1800 858 858</a></p> <p><a href="https://www.gamblinghelponline.org.au/">https://www.gamblinghelponline.org.au/</a></p>
<b>Lifeline</b>	<p>24/7 crisis support and suicide prevention services for anyone experiencing distress</p>	<p>13 11 14</p> <p><a href="http://www.lifeline.org.au">www.lifeline.org.au</a></p>
<b>Mates in Mining</b>	<p>24/7 suicide prevention and support for the mining industry</p>	<p>1300 642 111</p> <p><a href="https://mates.org.au/mining">https://mates.org.au/mining</a></p>
<b>SANE Australia</b>	<p>SANE is for people with recurring, persistent or complex mental health issues and trauma, and for their families, friends and community.</p> <p>They offer free counselling service which can be accessed via phone, chat or email as well as factsheets and guides on a range of complex mental health issues.</p>	<p><a href="https://www.sane.org/">https://www.sane.org/</a></p> <p>1800 187 263</p>