

City Communications Pty Ltd

SUPPORTING VULNERABLE CUSTOMERS POLICY

1. Policy Overview

City Communications Pty Ltd (ABN 48 168 731 913) and its related bodies corporate (City Communications) agrees to be bound by this document.

City Communications has internal policies and training in place to understand and support customers and others who are experiencing vulnerability, including people affected by family violence.

City Communications is committed to taking extra care with customers who experience vulnerability. City Communications recognises 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.

This Support for Vulnerable Customers Policy (Policy) sets out how City Communications will identify, and support people who experience vulnerability, including people affected by family violence.

The objectives of this Policy are to:

- Set out the framework and processes to identify, support and help minimise the risk of harm in interactions with vulnerable customers;
- Ensure City Communications provides timely, consistent and targeted assistance to those affected by family violence; and
- Ensure City Communications employees:
 - Understand if a person may be vulnerable;
 - Decide about how best, and to what extent, City Communications can support people with vulnerabilities;
 - Take account of particular needs or vulnerabilities; and
 - Engage with people with vulnerabilities with sensitivity, dignity, respect and compassion
 - this may include arranging additional support, for example referral to people, or services, with specialist training and experience.

2. City Communications: customers

City Communications will develop and implement policies to support customers and others who are experiencing vulnerability, including people affected by family violence.

City Communications will publish on their website and in any branches, an up-to-date list of assistance and referrals (internal or external) available to customers affected by family violence and how customers may access such assistance.

3. City Communications: responsibilities

Customers affected by family violence need to be able to quickly access information about the policies they hold, the sign-up process and the support available to them.

City Communications will work with and support its customers to:

- Ensure that safety is paramount for anyone affected by family violence;

- Provide training to employees to recognize family violence and improve responses to someone affected by family violence;
- Protect the privacy of customers affected by family violence;
- Minimise the number of times a customer affected by family violence needs to disclose information about family violence;
- Ensure appropriate and sensitive service handling processes for customers affected by family violence;
- Ensure collection arrangements are handled sensitively;
- Arrange access to Financial Hardship help;
- Inform customers, employees, distributors and service suppliers about information and assistance available to people experiencing family violence;
- Refer customers, employees and distributors to specialist services; and
- Support employees who:
 - are affected by family violence; or
 - experience trauma after serving affected customers.

4. How do I know if a customer is Vulnerable?

A person’s vulnerability may be due to a range of factors such as:

1. age;
2. disability;
3. mental health conditions;
4. physical health conditions;
5. family violence;
6. language barriers;
7. literacy barriers;
8. cultural background;
9. Aboriginal or Torres Strait Islander status;
10. remote location; or
11. financial distress.

This is not an exhaustive list and City Communications employees should could keep an open mind about what constitutes vulnerability. Each customer has their own unique story, which is personal to them and can be very sensitive. To help support our customers, our communication or service needs to be tailored depending on their individual needs and circumstances.

Some examples may include:

- Elderly customers who may be hearing or sight impaired or need extra time;
- Loss of employment for a customer or family member;
- Family breakdown;
- Illness, including physical incapacity, hospitalisation, or mental illness of the customer or family member;
- A customer who may be experiencing domestic violence; or
- A death in the family.

It's imperative that City Communications employees take the necessary measures to make the service interactions a positive experience, which is guided, prompt, and respectful.

In these circumstances, City Communications may choose to send out a representative who has the expertise to meet the customer in person and walk them through the claim process. This will assist the customer to gain a confident understanding of the next steps required to get them back to normal quickly and easily.

5. How does City Communications provide support?

If a customer affected by family violence makes service request, City Communications needs to handle the service request with sensitivity, flexibility and care.

This is particularly important if:

- the customer and the perpetrator are joint policyholders; &/or
- the perpetrator has caused the need for the service request — for example, by damaging the customer's property.

City Communications will ensure that City Communications employees have the skills, tools, and training to handle these service requests with flexibility and care.

The training program will encompass training on:

- The need for City Communications to clearly and transparently explain to the customer the service process and what is required of them;
- Having specialist employees with adequate authority to make decisions in family violence-related claims;
- Interacting with survivors of violence and possible triggers of violence;
- Handling communication with vulnerable customers and victims of domestic violence including that customers may not have access to a telephone or email or to their personal or financial records, or their other documents; and not require the customer to do either of the following (unless they are comfortable doing so):
 - make direct contact with the perpetrator; or
 - make a police report about the perpetrator.

- Ensuring that anyone interviewing or investigating a customer who may be affected by family violence (or going to their home):
 - is aware that they may be putting themselves in danger; and
 - is appropriately trained under the investigation standards of the Code.
- Settlement of services, in cases of family violence and family law property disputes.

If City Communications employees are told, or identify, that due to a vulnerability someone is in need of additional support or assistance, they will work with that person try to find a suitable, sensitive and compassionate way to proceed.

City Communications will do this as early as practicable and will protect each individual's right to privacy. If City Communications employees can see or identify, that a customer needs additional support from someone else (for example, a lawyer, consumer representative, interpreter or friend), then the City Communications employee will recognise this and allow for it in all reasonable ways. City Communications will try to make sure its processes are flexible enough to recognise the authority of our customer's support person.

Additional support may include making it easier for customers to communicate with City Communications or referring them to a financial counsellor or an appropriate community support service.

If customers need support to meet identification requirements, City Communications 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.

Where practicable, City Communications will provide access to an interpreter and keep reports on where interpreters are used.

City Communications will where possible:

- Enable the customer to deal with the same employee each time, or to have a single pathway to an appropriately trained team;
- Provide copies of documents to the customer without charge to help resolve matters, or for legal purposes;
- Work with the customer's agent or representative — for example, a professional financial counsellor, lawyer, community services or social worker, legal aid officer or family violence specialist;
- Make it as simple as possible for the customer to appoint an agent or representative while recognising privacy obligations; and
- If required, referring the customer to a qualified, independent interpreter to assist with communication.

City Communications employees can play a role in identifying that a customer is experiencing family violence. This can help reduce the impact of the violence.

Service suppliers can be involved in circumstances when indicators of family violence may first become apparent — for example, at the time of service and after a major disaster.

Accordingly, City Communications employees and service suppliers will be trained in identifying family violence and to respond accordingly.

6. How does City respond and support this change?

City Communications will be honest, efficient, fair, transparent and timely in its dealings with its customers. City Communications' approach to managing vulnerable customers will differ depending as to the role or the service that is being provided.

Any employee that is in contact with someone who has been affected by family violence must handle the situation with appropriate sensitivity. City Communications will ensure employees who deal directly with customers, such as technicians, customer care representatives, are provided with training regarding interactions with vulnerable customers. That training will take place before the employee comes into contact with a customer who has been identified as being affected by family violence.

City Communications will also ensure that:

- Employees who deal directly with customers have been trained in and are aware of identifying vulnerability, such as family or domestic violence and are able to respond accordingly;
- Employees understand and have information available for referral and support to customers experiencing vulnerability such as family or domestic violence; and
- Employees are aware of the appropriate escalation process for notifying our specialist teams of any potential vulnerability noted.

Appropriate sensitivity will be applied when contacting a customer who is experiencing vulnerability such as family or domestic violence or mental health. City Communications has processes, systems and training to:

- Appropriately triage matters involving family violence — including ensuring City Communications employees:
 - Decide — as a matter of priority — on a service or whether to provide Financial Hardship help; and
 - Promptly escalate an issue to a more senior person;
 - refer the customer affected by family violence to specialist services that can give further guidance.
- Ensure City Communications employees understand the impact of trauma on a customer affected by family violence — in particular, how trauma may affect the way they appear and present;
- Ensure City Communications employees engage with customers in a supportive manner;
- Ensure City Communications employees understand the potential impact — sometimes positive and sometimes negative — that they can have on a customer experiencing family violence;
- Ensure City Communications employees understand the need for strict confidentiality and privacy in relation to a customer affected by family violence;
- Ensure City Communications employees understand the significant and heightened safety risks for women and children during and after a relationship separation;

- Ensure City Communications employees understand that perpetrators of family violence:
 - are customers whose needs have to be managed appropriately; and
 - may attempt to convince the employee to disbelieve or dismiss someone affected by family violence;
- Ensure City Communications employees understand the need for flexible arrangements for, and responses to, customers affected by family violence;
- Ensure City Communications employees understand the legal and procedural implications of court-issued family and domestic violence orders to the extent that these impact a claim or the customer experience; and
- Ensure City Communications employees know about local referral pathways and contacts for local support services.

7. Protecting customer privacy

City Communications will provide for the secure and confidential handling of private and confidential, and personal information about any customers affected by family violence in order to protect their safety. These customers need to have confidence that such information — particularly their physical address — is secure and not at risk of deliberate or inadvertent disclosure.

Customers affected by family violence need confidence that the information about their family violence that they share with City Communications is not disclosed to any perpetrator and is accessible only to authorised employees.

The Code requires City Communications and their Supply Chain Partners to protect the rights to privacy of vulnerable customers who have notified City Communications of their need for additional support from someone else (for example, a lawyer, consumer representative, interpreter or friend).

City Communications will:

- Ensure it has systems in place to keep the customer’s contact information secure and confidential;
- Give customers access to personal information held about them in accordance with the City Communications Privacy Policy.

8. City Communications: Employees

City Communications employees may also be affected by family violence and require support in the same way that others do. Employees may be adversely affected either by the impact of the customer’s issues or when their interactions with a customer cause them to relive their own experiences of family violence.

City Communications employees also may be perpetrators of family violence and need support to deal with that.

City Communications will ensure that it has procedures and programs in place to support employees who are impacted by family and domestic violence. This will be reviewed on a case by case basis.

City Communications has an Employee Assistance Program which is available to all staff 24 hours, 7 days per week. This is a confidential professionally resourced service available to support City

Communications employees and their families through a wide range of challenges they may experience and is provided at no cost.

9. Training

City Communications may assign a City Communications employee, who can:

- Act as a referral point to support employees and suppliers or sub-contractors in managing vulnerable customers;
- Provide coaching to employees in vulnerable customer management best practice; and
- Act as an escalation point, where customers require management by an employee, supplier or sub- contractor with specialised training.

City Communications will train City Communications employees to assist them to:

- Understand if a customer may be vulnerable;
- Decide about how best, and to what extent, they can support a vulnerable customer;
- Understand how to record and flag vulnerable customers in the service management system;
- Understand how to take account of a customer's particular needs or vulnerability;
- Understand how to engage with a vulnerable customer with sensitivity, dignity, respect and compassion — this may include arranging additional support, for example, referring the customer to people or services with specialist training and experience.
- Understand how to protect private and confidential, and personal information of customers affected by family violence;
- Understand how to minimise the number of times customers affected by family violence need to disclose information about family violence;
- Understand how to help customers who are affected by family violence — including those suffering Financial Hardship;
- Understand how to refer customers to specialist family violence services, where appropriate; and
- Understand how to support employees who are affected by family violence or who experience vicarious trauma after dealing with customers affected by family violence.

10. Reporting & Escalations

City Communications systems and complaint files, along with all other relevant records must be maintained as follows:

- Vulnerability cases to be recorded in City Communications' CRM systems, including the recording of vulnerability type.
- Customer data, inclusive of vulnerability, to be managed in accordance with City Communications' Privacy Policy.

- Unless otherwise instructed by a customer, if City Communications employees are notified of or identify a vulnerable customer, they must record the relevant information on the service file. The record should include:
 - The date the vulnerability was disclosed or discovered;
 - How the vulnerability was disclosed or discovered;
 - The type/s of vulnerability;
 - Details of any support or special requirements requested by the vulnerable customer; and
 - Having knowledge of the record and the customer, any recommendations they made in responding to the vulnerable customer.

Note: If a customer is distressed and says that they are not coping and suggest or say they may harm themselves, the following actions must be taken:

- If the customer is in immediate danger call Emergency Services (000 in Australia and 111 In NZ).
- Escalate the call to an internal Leader trained in dealing with these call types. They can then provide the customer with information from the Resource Services and Referral Contacts.
- Suggest the customer appoints a support person to assist in the management of their service.
- Seek advice from internal escalations points or customers.

Details of all notifications and offers of support for vulnerable customers are recorded within and saved to customer specific share-point registers. These registers are made available to both internal consultants, leaders and managers as well as to City Communications customers.

City Communications will regularly review and improve this Policy and its associated processes and procedures.