



# Vulnerable Clients and Financial Hardship Policy

PREPARED FOR

Coverforce HoldCo Pty Ltd and all its  
subsidiaries & related entities  
ABN 50 646 558 223

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## ABOUT THIS POLICY

This Vulnerable Clients Policy (the **Policy**) applies to Coverforce HoldCo Pty Ltd (ACN 646 558 223) and all of its related subsidiaries and entities, including but not limited to:

1. Coverforce Pty Limited (ABN 31 067 079 261) (AFSL: 238874);
2. Coverforce Insurance Broking Pty Ltd (ABN 11 118 883 542) (AFSL: 302522);
3. Coverforce Partners Pty Ltd (ABN 57 089 245 465) (AFSL: 245377);
4. Coverforce Complete Insurance Brokers Pty Ltd (ACN 006 125 668) (AFSL: 246584);
5. Coverforce Aughtersons Pty Ltd (ABN 90 007 367 535) (AFSL: 227200);
6. Westminster Coverforce Pty Ltd (ACN 008 908 852) (AFSL: 237466) and
7. Thomas Insurance Brokers Pty Ltd (ACN 007 745 566) (AFSL: 221218).

(collectively, the **Coverforce Group**).

This policy manages how employees should handle dealings with vulnerable clients.

This Policy applies to all the Coverforce Group's employees and consultants, including employees of the abovementioned AFSL licensees.

This Policy has the full support of the board and senior management of the Coverforce Group and is seen as a key component of ensuring the long-term success and viability of the Coverforce Group.

If any employee chooses not to follow this Policy, that employee will be in breach of the Coverforce Group's code of conduct and the term of their employment agreement. This may result in grounds for termination of employment or the need for further disciplinary action to occur.

## INTRODUCTION

The Coverforce Group are committed to supporting clients who may be experiencing vulnerability. This Policy aims to provide guidance on Coverforce Group's position towards vulnerable clients, through educating employees and stakeholders on identifying and supporting vulnerable clients.

## VULNERABLE CLIENTS

Vulnerable clients are clients who, as a result of socio-demographic characteristics, behavioural characteristics, personal situations, or market environment, are especially susceptible to loss or harm (a **Vulnerable Client**).

A person's vulnerability may be due to a range of factors including:

- i. Age;
- ii. Disability;
- iii. Mental health conditions;
- iv. Physical health conditions;
- v. Family and domestic violence
- vi. Language and/or literacy barriers;
- vii. Cultural background;
- viii. Aboriginal or Torres Strait Islander status;
- ix. Remote location;
- x. Technology capability
- xi. Financial distress; or
- xii. Other personal or financial circumstances causing significant detriment.

The Coverforce Group will do our best to identify any vulnerability. We encourage clients and potential clients to communicate with us and advise if they are experiencing vulnerability.

There are a number of tools client facing staff can use to help them identify Vulnerable Clients. The Coverforce Group adopts the NIBA protocols of "CARE" and "BRUCE".

## THE CARE PROTOCOL

**Comprehend:** Is the client able to follow the conversation and understand what is being said?

**Assess:** Is the customer able to weigh up the information being presented to them?

**Retain:** Is the customer able to retain and remember information, and recall this at a later point?

**Evaluate:** Is the customer able to properly express, explain or communicate their decisions?

## THE BRUCE PROTOCOL

**Behaviour & Talk** – are there any clues in the customer’s speech and behaviour?

**Remembering** – are there any signs that the customer has difficulty with recall?

**Understanding** – are there any signs that the customer is having difficulty understanding the information you are giving them?

**Communication**- is the customer able to communicate what they think, their decision and any questions?

**Evaluation** – is the customer finding it difficult to weigh up all of the information?

When engaging with customers, the Coverforce Group employee’s should ask themselves these questions if they believe they may be dealing with a Vulnerable Client.

In circumstances where a vulnerable client does not respond to a communication, we should try to contact the client using a range of communication channels.

## RECORDING INFORMATION

The Coverforce Group acknowledges the importance of recording information for documentation purposes. This is to minimise the need for repetitive disclosures from Vulnerable Clients, particularly in situations like domestic violence where obtaining supporting documentation can be difficult.

## SUPPORTING VULNERABLE CLIENTS

The Coverforce Group will endeavour to make sure our processes are flexible enough to recognise the authority of a support person.

The Coverforce Group will have internal policies and training appropriate to our employee’s roles to help them:

- i. Understand support options available to Vulnerable Clients and to what extent we can provide support;
- ii. Take account of a client’s particular needs or vulnerability; and
- iii. Engage a client or potential client with sensitivity, dignity, respect and compassion – this may include arranging additional support, by referring a vulnerable person to people or services with specialist training and experience.

## FINANCIAL HARDSHIP

Coverforce acknowledges that unforeseen situations can arise, which may make it difficult to meet financial commitments. If a client is experiencing financial hardship, Coverforce encourages them to make their representative aware, so that Coverforce may appropriately consider the relevant options available and work to the best of their ability, to advocate for the client’s best interests. Through Coverforce proactively identifying, communicating with, and supporting clients experiencing such financial hardship, Coverforce should be able to advocate for the fair treatment of consumers more effectively - we acknowledge this is fundamental to reaching good outcomes in the industry for vulnerable clients.

## DOMESTIC VIOLENCE

Domestic violence is a prevalent and complex issue that is present throughout our communities. The Coverforce Group is committed to supporting people affected by domestic violence and treating them with the utmost dignity and respect.

We recognise that domestic violence means more than physical violence. It includes emotional abuse, psychological abuse, sexual abuse, financial or economic abuse and damage to property.

The Coverforce Group's priority is to ensure that whenever domestic violence is identified or suspected, the safety of the customer affected by domestic violence and their family is protected and that we are committed to supporting them.

An example of this in the insurance industry is where a perpetrator of domestic violence is undermining a victim by making changes to insurance arrangements that provide them with more control over the benefits of insurance, which could have serious ramifications for the victim.

Particularly relevant to the insurance industry could be questions about:

- (a) What to do when there are conflicting instructions provided from joint policy holders about cancellation of a policy or payment of a claim;
- (b) The potential for a perpetrator to instruct a broker to make changes to a policy without reference to the victim;
- (c) Disclosing information about a victim to a perpetrator to the detriment of the victim.

Where payment has been missed, we should make reasonable efforts to contact the vulnerable client and confirm if cover is not required and/or assess the appropriateness of further assistance being offered to them.

## OUR EMPLOYEES

The Coverforce Group's employees and third-party providers are trained so that they can deal appropriately and sensitively with Vulnerable Clients.

We are committed to training our employees to help them:

- i. Understand if a customer may be vulnerable;
- ii. Take account of a customer's particular needs or vulnerability;
- iii. Determine how best to support a Vulnerable Client; and
- iv. Appropriately engage with a Vulnerable Client with sensitivity, dignity, respect and compassion.

The Coverforce Group acknowledges that our employees who regularly engage with Vulnerable Clients, may also require support.

Our employees will be required to complete regular trainings and undertake modules relating to vulnerable clients, on an annual basis.

## DEALING WITH A VULNERABLE CLIENT

The Coverforce Group have put in place the following protocols when dealing with a Vulnerable Client:

1. If you believe you are dealing with a Vulnerable Client, you should report this to your manager, who in turn should notify the Compliance Team via email at [Compliance@coverforce.com.au](mailto:Compliance@coverforce.com.au)
2. If your manager approves for you to continue dealing with this client, you should take the time to provide better support to the client through methods such as:
  - a. Allowing extra time to explain advice and answer client questions;
  - b. Providing complex advice over several shorter meetings instead of one lengthy detailed email;
  - c. Meeting clients at their premises or via teleconference;
  - d. Communicating via the National Relay Service ensuring company websites and other client-facing materials meet accessibility requirements;
  - e. Provide access to translation and interpretation services; and
  - f. Allow for an authorised third party (such as a friend or family member) to attend meetings with the client.
3. There may be times where the client requires a level of support that a broker is simply unable to provide. In these circumstances, it is important brokers are aware of appropriate specialist services to which clients can be referred to for assistance. These services are:

Services	Contact Details
Hearing and Speech impairment	National Relay Service - 1800 555 660
Translating and Interpreting Service	131 450
Emergency Services	000
Mental health	Lifeline – 13 11 14 Beyond Blue – 1300 22 4636
Family violence counselling	1800 737 732
National Debt Helpline	1800 007 007
Legal Aid	1300 888 529
Mob Strong Debt Helpline- free legal advice about money matters for Aboriginal and Torres Strait Islander peoples	1800 808 488
Mensline	Online support service for men with family and relationship concerns 1300 78 99 78


## RESPONSIBILITY & REVIEW


The Coverforce Group Legal Counsel in conjunction with the Compliance Committee is responsible for review and updating of the Vulnerable Clients Policy.

This policy will also be subject to a formal review every two years or earlier as required.

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For more information

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 [coverforce.com.au](https://coverforce.com.au)

This Vulnerable Clients and Financial Hardship Policy is  
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