

SUPPORTING VULNERABLE CLIENTS POLICY

This Supporting Vulnerable Clients Policy (Policy) has been developed to comply with National Insurance Brokers Association (NIBA) Insurance Brokers Code of Practice (the Code) and sets out how QIB Group of Companies (“We”, “Us” or “Ours”) identifies and supports vulnerable clients, including those affected by Financial Hardship and Family Violence.

For the purposes of this Policy, any reference to “Clients” includes clients of ours as well as any other individual entitled to Financial Hardship support under the Code. This could include individuals who we are seeking to recover money from as we believe they have caused damage to an insured client.

We are committed to exercising greater care when dealing with Vulnerable Clients. A person may be vulnerable due to a range of factors, including:

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

1 POLICY STATEMENT

QIB Group of Companies has a long-standing commitment to conducting its business with honesty and integrity and remains committed to full compliance with the Code and informing Clients, employees and authorised representatives about information and assistance available to vulnerable people, including those experiencing Family Violence and Financial Hardship.

This policy and our internal policy and training programs assist employees to:

1. Identify and understand if a client may be vulnerable;
2. Determine how best, and to what extent, they can support a vulnerable client;
3. Take account of a client’s particular needs or vulnerability; and
4. Engage with a vulnerable client with sensitivity, dignity, respect and compassion. This may include arranging additional support and referring the client to specialised people or services.

We may need to be flexible and vary the approach based on individual circumstances, including providing more personalised support to help navigate our processes and working within any processes and procedures set by our security partners.

2 TRAINING

Training is tailored to all employee roles within the business and the degree of contact they have with clients.

We will aim to ensure that all employees and representatives have been trained and receive ongoing training so that they:

- are aware of QIB Group of Companies policies and procedures when they are engaging with vulnerable clients;
- identify vulnerable clients, including those affected by Family Violence and Financial Hardship;
- deal appropriately and sensitively with vulnerable clients; and
- apply the Supporting Vulnerable Clients policy and related policies and procedures relevant to their role in dealing with clients.

Training is aimed at assisting employees to reduce the impact of vulnerability on clients.

3 FAMILY VIOLENCE

In Australian law, 'Family Violence' is defined as:

“violent, threatening or other behaviour by a person that coerces or controls a member of the person’s family or causes the family member to be fearful.”

Family Law Act 1975 (Cth), section 4AB.

Family Violence means much more than physical violence. It includes:

- emotional abuse, psychological abuse, sexual abuse, financial or economic abuse; and
- damage to property.

The way employees deal with clients who may be affected by Family Violence should facilitate, rather than act as a barrier to identifying Family Violence and improve the experience of those affected by Family Violence.

The aim of the Policy is to ensure that whenever Family Violence is identified or suspected, the safety of the Client affected by Family Violence and their family is protected.

We recognise that Family Violence is unacceptable in any relationship and clients experiencing Family Violence will be treated with dignity and respect.

The support of clients experiencing Family Violence and their family is the highest priority. Clients who indicate or disclose Family Violence are able to access support from us that is appropriate to their circumstances.

4 FINANCIAL HARDSHIP

Financial Hardship occurs when clients experience difficulty in meeting their financial obligations to us or our security partners.

The support the QIB Group of Companies can provide is limited to the payments owing to us that are not premiums or premium funding, and we will endeavour to support you and explore suitable solutions tailored to your individual situation.

If you are experiencing financial difficulties and are unable to pay your premium, or premium funding commitments, we will collaborate with you and your insurer to identify appropriate support options.

For complimentary, confidential, and independent financial advice, please consult Financial Counselling Australian at <http://www.financialcounsellingaustralia.org.au> or contact the national financial counselling helpline on 1800 007 007.

Financial hardship provisions in the Code -

For further information regarding the General Insurance Code of Practice, to which insurers may adhere, or to request a copy of their Code, please visit <https://insurancecouncil.com.au/>

For further information regarding the Premium Funding Code of Practice, to which premium funding companies may adhere, or to request a copy of their Code, please visit <https://www.afia.asn.au/ipf-code>

For additional details about the Insurance Brokers Code of Practice, which we also subscribe to, or to obtain a copy of the Code, please visit our website <https://www.qibgroup.com.au> or alternatively, <https://www.niba.com.au>

5 ASSISTING CLIENTS

The ways in which we can assist vulnerable clients include:-

For those experiencing **Financial Hardship** or **Family Violence**, we can do so by:

- ensuring safe and confidential communication in light of individual circumstances;
- helping to set up new insurance policies;
- helping to arrange access to financial hardship support; and
- referral to specialist support services.

These assistance measures may be expanded and varied depending on what our insurance partners have established.

If we are advised or we identify that a client or potential client requires support from a third party (eg: lawyer, interpreter, or friend) we will make reasonable accommodations to allow for this.

For those customers requiring assistance with **language barriers** or **cultural support**, we have compiled a list of our employees and their cultural / language proficiencies, who are available to

assist with translation services. We also have their consent to provide cultural support if required, including our **Aboriginal or Torres Strait Islander** team members.

Additionally, for languages outside of our Company capabilities, we are able to engage TIS National, the Australian Government's Translating & Interpreting Service, to support our clients or their parties requiring further language assistance. Arrangements can be made for both immediate and pre-booked phone or on-site conversations.

For further information, please visit <https://www.tisnational.gov.au/> or call 1800 131 450 to request assistance in your preferred language, available 24 hours a day, 7 days a week.

If a customer or third party is deaf and/or experiences **difficulty hearing or speaking** with individuals using a telephone, we may utilise the services of the National Relay Service (NRS). Various services can be provided and tailored to the individual needs, such as Voice Relay Calls, TTY (Speak/Type/Listen/Read), SMS and video conferencing.

For further information, please visit <https://www.accesshub.gov.au/about-the-nrs/> or contact the Voice Relay number 1300 555 727 (TTY 133 677) or the SMS Relay number 0423 677 767.

We will maintain a record if a cultural support / interpreter is utilised or if there are reasons preventing us from arranging one.

In circumstances where the issue is complex or unable to be dealt with by the primary person who took the call, it is to be immediately referred to the Compliance Team for consideration. The client will be informed of this action.

6 SUPPORT SERVICES AND RESOURCES

There are many support services, both nationally and locally based. In addition to the support services already mentioned in this document, below are some additional resources which may be referenced if required.

Agency	Phone	Website	Services available
1800 RESPECT	1800 737 732	1800respect.org.au	National 24-hour Domestic & Family Violence and Sexual Assault Line.
Beyond Blue	1300 224 636	beyondblue.org.au	24/7 support to people experiencing anxiety or depression.
Lifeline	13 11 14	lifeline.org.au	24/7 counselling & referral service for people in a crisis situation.
National Association of Community Legal Centres		http://www.clcs.org.au/	An independent not-for-profit community organisation that provides legal and related services, especially to those who are economically, socially or culturally disadvantaged with special needs.
National Debt Helpline	1800 007 007	https://ndh.org.au/	Financial counselling is a free, confidential service to assist people in financial difficulty.

7 CONTACT US

Our Privacy Policy

Our Privacy Policy pertains to the operations of our organisation within Australia and outlines how we handle your personal information. To access a copy of our Privacy Policy, please visit our website at <https://www.qibgroup.com.au/privacy-policy/>. We are committed to protecting your privacy and ensuring confidentiality of your personal information, and we adhere to the Australian Privacy Principles outlined in the Privacy Act 1988.

Complaints

If you are dissatisfied with how your situation has been managed, you have the right to lodge a formal complaint. Details regarding our complaints handling process can be found on our website at <https://www.qibgroup.com.au/complaints/> or you may contact us using the information provided below:

The Complaints Officer
Telephone: +617 4167 4200
Email: complaints@qibgroup.com.au

Alternatively, you can contact us via:

Attn: The Complaints Officer
QIB Group Holdings Pty Ltd
GPO Box 2921
Brisbane QLD 4001