CUSTOMER VULNERABILITY POLICY

AEI Insurance Group Pty Ltd T/As AEI Insurance Broking Group
ABN 74 123 670 002

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1. INTRODUCTION

At AEI Insurance Group Pty Ltd we recognise that customer vulnerability is a serious issue that it affects diverse sectors of our community. Our policy outlines the support available to all customers who may be experiencing vulnerability. In the case of our customers experiencing vulnerability, the nature of their circumstances mean they are particularly at risk of harm or loss. Vulnerability can be temporary or permanent and people experience vulnerability differently.

1.1. What is a vulnerable customer?

A vulnerable customer is defined as “someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when a firm is not acting with appropriate levels of care.”

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.

Family and domestic violence can include, but is not limited to:

- physical violence
- sexual assault
- emotional or verbal abuse
- psychological abuse or controlling behaviour.
- stalking
- financial abuse, and
- abuse of older Australians.

1.2. Support for our customers

We acknowledge that if you have previously experienced vulnerability, such as family violence or are currently experiencing family violence that this may make your ability to communicate with us more challenging, and/or make payments to us more difficult. We also acknowledge that we have a responsibility to ensure that we have in place measures to support you in these times of need.

We are committed to taking extra care with customers who experience vulnerability and recognise 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.

1.3. Our commitment to you

- We recognise violence is unacceptable in any relationship and customers experiencing family violence will be treated with dignity and respect.
- The support we provide customers experiencing family violence or other vulnerabilities is of the highest priority.
- Customers who indicate or disclose family violence are able to access support from us that is appropriate to their circumstances.
- Disclosures made to any relevant third parties will be made with great care, keeping in mind the sensitivity and confidentiality of the customer’s situation; and

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- We may need to be flexible and vary our approach to our customers based on individual circumstances, including providing more personalised support to help customers navigate through our processes.

1.4. We are here to support you.

Where you disclose vulnerability, or where we have reason to believe family violence is occurring, we will handle this information sensitively and will, on a case-by-case basis, consider various measures to support you, such as:

- prioritising the sensitivity of your situation.
- maintaining confidentiality of information.
- minimising the number of times, you need to disclose your situation by having dedicated employees specifically trained to assist customers experiencing family violence;
- manage the way we communicate with you, so we do not add further risk;
- providing you with referral assistance to appropriate support agencies where needed.

1.5. Training our employees to assist you.

All our customer-facing employees have received awareness training to support customers experiencing vulnerability. Additionally, AEI Insurance Group Pty Ltd has dedicated employees within our Company who have received additional specialist training to support customers experiencing vulnerability with extra care and flexibility.

1.6. Confidentiality undertaking

We understand the risks of disclosing information in relation to customers experiencing vulnerability. Protecting your personal and other confidential information – such as your physical address and telephone number – is critical to your safety in these situations.

In addition to our Privacy Policy, we will discuss safe ways to communicate with you and how we record your confidential information. We will protect your sensitive information and, where possible, give you control over how your personal information is shared with third parties. We will inform you about what information you need to share with other policyholders, such as information about a claim, so you can make appropriate arrangements.

2. PROCESS

If you tell us, or we identify, that due to a vulnerability you need additional support or assistance, we will work with you and try to find a suitable, sensitive, and compassionate way for us to proceed. We will do this as early as practicable, and we will protect your right to privacy.

2.1. Dealing with vulnerable customers

We will take additional care when dealing with customers who are identified as being vulnerable and provide additional support and assistance in connection with the provision of our services. If you self-identify as being affected, you will be treated in accordance with this policy without further evidence being required.

We will treat all information as sensitive and will take measures to ensure the information is kept confidential.

2.2. Safe communication

Any engagement that we have with impacted customers will be dealt with in a confidential manner. We ensure that we record these communication methods, including details of any third-party engagement, such as a financial counsellor, lawyer, community services or social work, legal aid officer or family violence specialist.

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We ensure that we minimise the information that a customer is required to provide and the number of times they are required to disclose the same information, noting that they may not have access to their personal information, records, and documents.

Where possible, we provide consistency by way of ensuring one point of contact or a single pathway to a specialist.

2.3. Joint policy holders

As a customer, if you hold a joint policy – i.e., someone else is named on your policy as well as you, we will consider the potential risks to your personal safety when communicating with you and ensure that our communication is in line with our privacy policy.

2.4. How to notify us

We encourage customers experiencing vulnerability to notify us by contacting your usual account manager, or should you prefer to discuss your circumstances confidentially, you can contact our Privacy Officer, Rachel Homan

If you tell us that you are affected by vulnerability, we will also determine whether you are also experiencing financial hardship and will refer you to the appropriate personnel to speak to.

If you are dissatisfied with the management of your situation, you can lodge a complaint. Information about our complaint management process can be found under the heading, Additional Customer Support, on our website www.aei.com.au or by contacting us at the details listed below in section 3 About Us.

Other services that may help

If you tell us, or we identify, that you need additional support from someone else (for example, a lawyer, consumer representative, interpreter, or friend), then we will recognise this and allow for it in all reasonable ways.

Always call 000 if you or your family members are in immediate danger.

Agency	Phone	Website	Services provided
1800 RESPECT	1800 737 732	1800respect.org.au	National 24-hour Domestic & Family Violence and Sexual Assault Line
MENSLINE	1300 78 99 78	mensline.org.au	24/7 support, information and referral service for men with family and relationship issues
Lifeline	13 11 14	lifeline.org.au	24/7 counselling & referral service for people in a crisis situation
Beyond Blue	1300 224 636	beyondblue.org.au	24/7 support to people experiencing anxiety or depression
National Debt Hotline	1800 007 007	https://ndh.org.au/	Financial counselling is a free, confidential service to assist people in financial difficulty
National Association of Community Legal Centres	Refer to website for local phone numbers in your area	http://www.naclc.org.au/	An independent not-for-profit community organisation that provides legal and related services to the public, focusing on the disadvantaged and people with special needs

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3. ABOUT US

3.1. Our Privacy Policy

The AEI Canberra Pty Ltd Privacy Policy applies to the operations of our company within Australia and explains how we manage your personal information. For a copy of our Privacy Policy, visit our website at www.aei.com.au. We safeguard your privacy and the confidentiality of your personal information and are bound by the Australian Privacy Principles which are set out in the Privacy Act 1988.

3.2. Complaints

If you are dissatisfied with the management of your situation, you can lodge a complaint. Information about our complaint management process can be found under the heading, Additional Customer Support, on our website at www.aei.com.au or by contacting us at the details listed below.

3.3. Contact details

AEI Insurance Group Pty Ltd T/As AEI Insurance Broking Group

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Australian Financial Services Licence Number 542944

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