



Vulnerable Persons Policy

Business Unit: Strategy

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Motor Trades Association of Australia

Superannuation Fund Pty Limited

ABN: 14 008 650 628

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1. Introduction

1.1. Background

Motor Trades Association of Australia Superannuation Fund Pty Ltd (**Trustee**) and its subsidiaries (**the Spirit Super Group** – “We”) are committed to taking extra care with vulnerable persons, including our members, beneficiaries and any other individual who interacts with us. We treat people experiencing vulnerability with empathy, compassion and respect. We encourage people who need extra support to let us know how we can help them.

1.2. Purpose

The purpose of this policy¹ is to document the Spirit Super Group’s expectation on how employees are to assist vulnerable persons.

1.3. Policy Applicability

This policy affects all employees of MTAA Superannuation Fund (Secretariat Co.) Pty Limited, together with all entities within the Spirit Super Group. To the maximum extent possible, this policy also applies to agents and contractors that act for or on behalf of the Spirit Super Group. To that extent, this policy is approved by the Trustee Board and adopted by the Boards of other subsidiary entities under the Spirit Super Group.

2. The objective of this policy

2.1. The objective of this policy is to ensure that:

- We are responsive to the needs of vulnerable people when designing, implement services, products, and procedures.
- Our employees understand and fulfil their responsibilities in supporting vulnerable people
- Our employees are adequately supported to help persons experiencing vulnerability with care, competency and empathy.
- Our employees have the tools and support they need to identify and help people experiencing vulnerability.

3. What is vulnerability

3.1. Vulnerability refers to people in circumstances which make them less able to manage their own affairs, and more susceptible to harm, loss or disadvantage, either personal or financial than a typical person. They may need extra support to help them achieve an outcome similar to someone who is not in those circumstances.

3.2. Vulnerability can impact anyone. It can:

- be temporary or permanent
- occur suddenly or gradually over a period of time
- result from a single significant event, or it can be triggered or exacerbated by several interconnected events or sets of circumstances.

3.3. A person experiencing vulnerability may need extra support to help them achieve an outcome similar to someone who is not in those circumstances. Their needs can change over time, or they may need extra help in certain situations.

¹ This policy has been developed with reference to the Financial Services Council (FSC) Insurance in Superannuation ‘Developing a Vulnerable Member Policy Guidance Note’¹. The Guidance Note provides a guide to what is considered to be industry best practice: <https://fsc.org.au/resources/fsc-standards-and-guidance-notes/guidance-notes>

4. Identifying vulnerability

4.1. Common vulnerability factors

People may identify with one or more of the groups of vulnerability listed below. We understand that other factors may impact a person's vulnerability, and the list of vulnerable groups below is not exhaustive.

A person who identifies with this list may not necessarily be vulnerable. Each situation should be treated on a case-by-case basis.

4.1.1 Aboriginal or Torres Strait Islander

People identifying as Aboriginal or Torres Strait Islanders may be affected by lower life expectancy, higher levels of child mortality, reading, writing and numeracy gaps, poor employment and early childhood and educational attendance. This can pose unique challenges with regards to managing their super. They may also encounter issues providing identification or providing certain documents.

4.1.2 Age

We recognise age can be a source of vulnerability in the context of financial services. Some examples include:

- Very young people may lack financial literacy.
- Older people may have challenges keeping up to date with technological changes or managing their affairs online, including transacting and accessing information to support informed decision making.
- Older people may also experience emotional or psychological abuse in the management of their finances or may be socially isolated.

4.1.3 Culturally and linguistically diverse backgrounds

People from other cultures or who speak a language other than English may find it difficult to interact with us. They may need extra help when communicating with us, such as translation services or enabling a support person to assist them.

4.1.4 Death

Death of a family member or close friend may impact a person's ability to engage with us. They may also need extra help in navigating the process to claim a member's death benefits.

4.1.5 Disabilities

Disabilities, impairments, or conditions can impact a person's daily activities, communication and/or mobility. This can impact a person's ability to engage with us.

We understand that disabilities can be:

- visible or non-visible
- inherited or acquired due to illness or injury
- temporary or permanent.

Under the *Disability Discrimination Act (1992)*, the definition of the term 'disability' is very broad. This means that people who may not even think of themselves as having a disability, are included. In relation to the *Disability Discrimination Act 1992*, the term disability refers to:

- Physical disability – affecting a person's mobility or dexterity
- Intellectual disability – affecting a person's abilities to learn
- Psychiatric disability – affecting a person's thought processes, perception of reality, emotions or judgment or that results in disturbed behaviour
- Sensory disability – affecting a person's ability to hear or see
- Neurological disability – affecting the person's brain and central nervous system

- Learning disability – resulting in the person learning differently
- Physical disfigurement – total or partial loss of the person’s bodily or mental function, or
- Immunological – the presence of organisms causing illness or disease.

4.1.6 Family and domestic violence

- Family and domestic violence can have a significant detrimental impact on a person's ability to engage with us.
- Family violence can occur when a person exercises power and control over a family member. Domestic violence is a form of family violence, and typically refers to violent behaviour between current or previous intimate partners. The term ‘violence’ also includes the attempt or threat of violence.
- Family violence can include verbal, physical and sexual violence, as well as psychological and emotional abuse. It may also include financial abuse where someone takes away access to money, manipulates financial decisions or uses money without consent.

4.1.7 Financial distress

Financial distress can occur when a person is unable to generate sufficient revenue or income to meet their financial obligations. It can result in people applying for early access to their super (eligibility criteria applies) and can impact how they engage with us. As there can be legitimate urgency for people in financial distress (such as those facing eviction or foreclosure) we can prioritise these applications.

4.1.8 Homelessness

A person may find themselves homeless due to financial difficulties or other circumstances such as domestic violence. This can affect their mental health and make communication more difficult.

4.1.9 Isolation

Isolation can impact on a person’s ability to engage with their super. This can include:

- Social isolation: This can occur when a person has minimal contact with others. Social isolation can increase a person’s risk of premature death from all causes and is associated with an increased risk of dementia.
- Geographical isolation: Where a person lives can affect their chance of injury or death. For example, people living in remote areas can experience disease at a much higher rate than major cities.
- Incarceration: Incarcerated people may also have higher health care needs than the wider population and often find it difficult to integrate back into the community.

4.1.10 LGBTQIA+, biological sex and gender identity

We recognise that it is unlawful to discriminate against a person based on sexual orientation, gender identity and intersex status. This is especially important in the context of insurance and death benefit claims.

4.1.11 Low level literacy

We understand that people with low literacy levels may have difficulty in understanding and communicating with us. Low literacy can include reading, writing, numeracy and financial literacy.

4.1.12 Mental health conditions

A mental illness, disorder or problem can significantly affect how a person feels, thinks, behaves, and interacts with other people. Mental illnesses can cause a great deal of suffering for those experiencing them as well as their families and friends. This can make interacting with us more difficult for impacted people.

4.1.13 Natural disasters and catastrophic events

Natural disasters and catastrophic events can include heatwaves, bushfires, droughts, floods, severe storms and tropical cyclones, earthquakes, pandemics, tsunamis and landslides. These events may lead people to apply for hardship claims or they may have difficulties providing identification or providing certain documentation. They may need extra understanding and compassion when interacting with us.

4.1.14 Scams and fraud

People who have been the victim (or knows someone who has been the victim) of a financial scam or fraud may be less inclined to interact with us, and may be less engaged with their finances. They may have additional needs to consider their account to be safe and secure.

4.1.15 Serious illness or injury

Illness or injury can make interacting with us and other external organisations (such as medical professionals and insurers) difficult. These individuals may need extra help and understanding during the claims process.

4.1.16 Unemployed

Unemployment can cause financial and emotional vulnerabilities. Along with loss of income unemployed people also stop receiving their super guarantee contributions which can impact their savings for retirement.

4.2. How we identify vulnerability

We encourage people who need extra support to let us know through the numerous channels we have available, whether that's phone, Live Chat, Email, Online forms or Written Correspondence.

Some signs that may indicate that someone is in a vulnerable situation include, but not limited to:

4.2.1 Verbal cues

- Ask employees to speak up or speak more slowly
- Can't hear the complete conversation or are missing important details
- Doesn't understand what employees are saying
- Sound like they are being coerced by another person
- Appears confused or flustered.

4.2.2 Other Cues

- Insists on us only communicating with them via written correspondence (not via online or phone channels)
- Mentions that they have intentions of self-harm
- Indicates that there is a language difficulty
- Is unable to provide a contact address for themselves
- Contacts us frequently asking the same questions or changes their story
- Enquiring about eligibility for an insurance benefit
- Potential beneficiaries informing us of a members' passing or enquiring about claiming a death benefit
- Members seeking early access to their super
- A member or potential member who has (or enquires about appointing) a legal Guardian or administrator, or a Power of Attorney.

5. How we support people experiencing vulnerability

5.1. Training

Training is provided to employees to ensure that we deal with vulnerable people in a professional manner, whilst displaying empathy, compassion and respect.

5.2. Communication

We understand the importance of inclusivity and accessibility of our communications.

We provide information:

- online at **spiritsuper.com.au**
- by calling us at **1800 005 166**
- by Live Chat
- by emailing us at info@spiritsuper.com.au
- by making an appointment with one of our Superannuation Advisers.

We can email or post requested information on request.

When developing or reviewing our communication content, we apply the following principles:

- Our content aims to be written clearly for a diverse audience.
- We use clear and simple language (otherwise known as 'plain English') where possible.
- We aim to use clear fonts and simple content layouts to make the content easier to view.
- We make our content available in a number of alternative formats where possible. For example, our video content provides both audio and subtitle options, with consideration to languages most commonly spoken by our members.
- Most of our publications advise readers that they can contact us via phone or email to discuss the content verbally, or they can request content be printed and posted or sent electronically.
- Content on our website aims to comply with Web Content Accessibility Guidelines (WCAG).

When communicating with vulnerable people, where appropriate we may:

- Communicate with the person in their preferred format wherever possible
- Use clear and simple language where possible
- Avoid stereotypes and assumptions (such as those relating to gender, age, culture) and will treat everyone as an individual
- Offer to send the member an email with anything they need to provide or do for later reference.
- Provide the person with details on how to access products and services specific to their needs, for example interpretation services and National Relay Service.

In addition to the support for our internal teams we can also refer vulnerable people to External Support for extra help - see *External support and resources* in section 6 of this policy for more details.

5.3. Additional support from third parties

- Where a person requires extra support from a third party such as a family member, friend or other representative, we will support this where possible by sharing information with a third party verbally (for the duration of the call or interaction only) or through written correspondence (including LiveChat).
- Third parties must be authorised before they can access information about member accounts. Members can authorise third parties using the *Third party authorisation* form available at spiritsuper.com.au/forms or by calling us on **1800 005 166**.
- Where a person is under the care of an appointed guardian, administrator or the holder of an enduring Power of Attorney, we will manage them in accordance with our *Privacy policy*. We will take authorised instructions relating to the Member's account only from the Public Guardian or nominated party.
- Where a member has a known Guardianship, Administrator or Power of Attorney attached and noted on the account, ask the member if the appointed person is present to participate in the interaction. Over the phone transactions that could be detrimental to the member should not occur. All disclosures, forms, and confirmation of transactions should be sent to the Authority.

5.4. Identification difficulties

- Where a person is unable to provide proof of their identity, we may be able to modify our procedures in accordance with AUSTRAC guidance². This could include providing extra time to provide the required information, or flexibility in the information requested.

5.5. Security concerns

Where there may be concerns about security, we may consider taking the following actions on a member's account:

- Adding an alert to the member's account
- Adding additional security questions, password or PIN
- Adding a block benefit payment flag to prevent withdrawal and rollover out requests
- Advising the member to update their password in **Member Online** or to request the account be temporarily disabled.

5.6. Early access to super

Members may be able to access some or all of their super in some limited circumstances, such as:

- Severe financial hardship
- Certain compassionate grounds
- Terminal medical condition
- Permanent or temporary incapacity.

For details, read our Early access to your super fact sheet available at spiritsuper.com.au/forms or by calling us on 1800 005 166.

5.7. Extra support for common vulnerability groups

5.7.1. Aboriginal and / or Torres Strait Islander peoples

- We will adopt a flexible approach to verification and identification and refer to AUSTRAC guidance in respect of Aboriginal and Torres Strait Islander peoples³.
- Flexibility may also be provided to those living in remote communities. This may include extra time to provide information or exercising discretion on acceptable documentation.
- Consider how we can further support Aboriginal and/or Torres Strait Islander peoples that may have reading, writing and numeracy gaps including referrals to external agencies (see s 5.7.2, s5.7.6 and s6).

5.7.2 Culturally and linguistically diverse backgrounds

- We provide access to a translation and interpretation service at a member's request, or where there is a need for an interpreter to communicate effectively with a member.

5.7.3 Disabilities

- Hearing impaired: services offered by AUSLAN and the National Relay Service are made available to members who are deaf or have a hearing or speech impairment.
- Vision impaired: we offer voice contracts in a variety of circumstances to allow members to complete transactions over the phone.

² <https://www.austrac.gov.au/business/core-guidance/customer-identification-and-verification/assisting-customers-who-dont-have-standard-forms-identification>

³ See footnote 2 above.

5.7.4 Family and domestic violence

- Our employees consider whether any specific security measures are required such as those listed in *Security concerns* in section 5.5 of this policy.
- Our employees refer members who identify they are experiencing family and domestic violence to external agencies listed under section 6 for professional guidance.

5.7.5 Financial distress

- Super law allows the release of funds from a super account prior to retirement in cases of severe financial hardship or compassionate grounds. See *Early access to super* in section 5.6 of this policy for more details.

5.7.6 Low level literacy

- We offer several financial education tools on our website and hosts seminars on a range of super related topics.

5.7.7 Mental illness

- Our employees are adequately equipped to identify and escalate (to their manager) threats of self-harm, suicide in relation to vulnerable members.

6. External support & resources

- 6.1. We provide access to support networks where vulnerable people can be referred or suggested for special assistance:

| General wellbeing | | |
|---|--|---------------|
| 360Health Virtual Care | https:// metlife.com.au/insurance-solutions/personal-insurance/360health/metlife-360health-and-spirit-super | |
| Aboriginal or Torres Strait Islander peoples | | |
| Crisis line run by Aboriginal and Torres Strait Islander people | | 13 92 76 |
| Services Australia | servicesaustralia.gov.au/payments-and-support-for-indigenous-australians?context=60078 | |
| Well Mob | wellmob.org.au | |
| Australian Institute of Aboriginal and Torres Strait Islander Studies (AIATSIS) | https://aiatsis.gov.au/ | |
| Age | | |
| Elder abuse hotline | eapu.com.au/elder-abuse-helpline | 1800elderhelp |
| Older Persons Advocacy Network (OPAN) | opan.com.au | 1800 700 600 |
| Disabilities | | |
| Disability Gateway connects you with information, support and services for employment, education, aids and equipment, income and finance and COVID-19 | disabilitygateway.gov.au | 1800 643 787 |
| Disability Services Australia | dsa.org.au/services | |
| National Relay Service (for persons who are deaf and/or finding it difficult to hear) | accesshub.gov.au/about-the-nrs | 1800 555 660 |
| Financial distress | | |
| Speak to a financial counsellor | financialcounsellingaustralia.org.au | 1800 007 007 |

| | | |
|---|---|--------------|
| Gamblers Help | gamblershelp.com.au | 1800 858 858 |
| Welfare Rights Centre (Centrelink Issues) | welfarerightscentre.org.au | |
| Australian Government Services Australia | servicesaustralia.gov.au/individuals/subjects/manage-your-money | |
| National Debt helpline | https://ndh.org.au/ | |
| Family and domestic violence | | |
| Family Violence Law Help –supporting domestic and family violence and the law in Australia | familyviolencelaw.gov.au | 1800 737 732 |
| Details on accessing 10 days of paid family and domestic violence leave each year for all employees (full-time, part-time and casual) | https://www.fairwork.gov.au/leave/family-and-domestic-violence-leave | |
| Ask Izzy (Support Services search tool) | askizzy.org.au | |
| The Salvation Army | salvationarmy.org.au/need-help/family-and-domestic-violence | 1300 371 288 |
| Services Australia | servicesaustralia.gov.au/crisis-payment | 13 11 58 |
| Good Shepherd (specifically supports women, girls and families) | goodshep.org.au | |
| Mental health | | |
| Lifeline | lifeline.org.au | 13 11 14 |
| SANE | sane.org | 1800 187 263 |
| Suicide Call Back Service | | 1300 659 467 |
| Suicide Line (VIC only) | | 1300 651 251 |
| Beyond Blue | beyondblue.org.au | 1300 224 636 |
| MensLine Australia | mensline.org.au | 1300 789 978 |
| Mental Health Services Helpline (TAS) | | 1800 332 388 |
| Black Dog Institute | blackdoginstitute.org.au | |
| Mental Health at Work | mhatwork.com.au | |
| Mind Matters | mindmatters.edu.au | |
| Butterfly Foundation (supports people experiencing eating disorders) | butterfly.org.au | 1800 334 673 |

7. Roles and responsibilities

- 7.1. Product is responsible for designing, reviewing and recommending any required changes to this policy for approval.
- 7.2. All Managers (within their area of responsibility such as Operations, Service Delivery and Marketing) are responsible for implementing processes or procedures and facilitate training to meet the requirements of the policy.
- 7.3. All employees who interact with members, beneficiaries and other individuals are responsible for displaying empathy and a willingness to assist vulnerable persons to the best of their ability, within business rules and relevant legislation.

8. Review of this policy

- 8.1. This policy is reviewed by the Trustee Board at least every 2 years. The Trustee Board may also review this policy at any time for any reason, in particular where it becomes aware that:
 - this policy is out of date;
 - this policy is no longer relevant to the circumstances of the Spirit Super Group; or

- there are relevant legislative, regulatory changes or industry guidance which would require an update to this policy.

9. Revision history

| Version | Reason for amendment | Date approved | Approved by |
|---------|----------------------|------------------|---------------|
| 1 | First version | 23 November 2023 | Trustee Board |