

Advanced Solutions AU Pty Ltd

Guidance for Vulnerable Customers

1. Introduction

Throughout this Guidance, Advanced Solutions AU Pty Ltd is referred to as the Company. The purpose of this Guidance is to outline the Company's understanding of its clients (customers) experiencing vulnerability, whether identified by them or not, and the actions we will take to provide services in a supportive environment, taking into account individual circumstances and requirements.

This Guidance is designed to assist in the identification of vulnerable customers. This supports the Company and relevant service providers to recognize the need for additional support required by customers who are identified or who self-identify as being vulnerable. This Guidance also aims to support vulnerable customers by:

- advocating for respect and inclusivity;
- providing an empathetic, well-defined, systematic approach to assisting vulnerable customers;
- assisting the proactive identification of vulnerable customers and minimizing the reliance on self-identification by the customers themselves;
- encouraging and supporting a culture of support, protection, and accountability;
- outlining how we will provide support to vulnerable customers to the best of our ability rather than through an ad hoc approach;
- empowering vulnerable customers to be confident in the decisions they make because they can access and understand information they need to make decisions; and
- helping guide staff training requirements.

2. Principles for Supporting Our Vulnerable Customers

We recognize that people identify differently because of their experience, circumstance, attributes, characteristics, or preferences. None of these differences should prevent an individual from being empowered to manage and access products and services related to VOIP or other technology solutions.

This Guidance recognizes that many vulnerable customers require dedicated and professional support when interacting with us. We have adopted a flexible approach when identifying and assisting vulnerable customers. We recognize that:

- many people will experience vulnerability, in some form and in some period, during their lifetime;
- the impacts of vulnerability can be experienced differently by different people;
- when this arises, people's needs may change or be exacerbated;
- vulnerable customers are entitled to respect, empathy, courtesy, and fairness;
- we should listen to our customers' stories and try to understand their circumstances and needs;
- our customers who have unique needs or experience vulnerability may require additional support when interacting with us;
- talking about personal vulnerabilities takes courage and strength. Some people's vulnerabilities can make communication difficult, as well as the person feeling shame and embarrassment;
- the impact of vulnerability is strong. People can often be trying to cope with limited time, energy, and resources in a high-stress environment. Their thinking may also be impacted as their priorities are elsewhere;
- we cannot solve all vulnerable customers' problems. However, we have an important role to play in supporting customers experiencing vulnerability. This may include referring the customer to an external service provider with specialist training or experience to appropriately engage with and support the customer with their needs; and

- we can help make a positive difference to vulnerable customers by being sensitive, showing compassion, being empathetic, looking out for red flags, and taking action to provide support.

3. Definition of Vulnerable Customer

We define vulnerability as a personal circumstance where a person is exposed to or susceptible to harm or loss. Customer vulnerability may apply only in the immediate time frame or in the medium or longer term and does not permanently define a customer. In this definition, we focus on the circumstances likely to give rise to vulnerability and not the 'type' of person.

We consider that the following circumstances may create a vulnerable customer risk:

- a person is experiencing family violence or financial abuse and/or distress;
- a person has a serious or terminal illness;
- a person is experiencing financial distress;
- a person is experiencing homelessness or appears to have no fixed address;
- a person has circumstances where a delay in addressing their issue or query could adversely affect their basic living conditions;
- a person is of Aboriginal or Torres Strait Islander status;
- a person is young in age (their financial literacy and experience may often be lower and their susceptibility to fraud and risk of being taken advantage of may be higher);
- a person is older in age (their use of technology may be low or restricted, they may have an age-related disability or they may be socially isolated);
- a person is elderly (they may suffer from elder neglect, elder emotional or psychological or financial abuse);
- a person has a disability*;
- a person has a low level of literacy including financial literacy;

- a person experiences a natural disaster;
 - a person is isolated or lives in a remote or regional community;
 - a person is incarcerated;
 - a person has a non-English speaking background.
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- In recognizing vulnerable customers with a disability, we define a disability, in accordance with the Disability Discrimination Act 1992 (Cth), to be an impairment or condition which impacts daily activities, communication and/or mobility and has lasted or is likely to last six months or more.

4. Basic Principles for Supporting Our Customers

Empathy and Understanding

We will provide support to our customers with authenticity, empathy, and understanding. In respect of vulnerable customers, we aim to provide them with trust and confidence to disclose their situation to us. This will then enable us to identify and facilitate the support needed.

We recognize that vulnerability doesn't only affect our customers; it also impacts our employees. We provide support to our staff who are interacting with vulnerable customers or experiencing vulnerability themselves through our Employee Assistance Programs and other mechanisms facilitated by our People team. We encourage our Fund Administrator to do the same.

Communications Style Including for the Visually Impaired

To ensure inclusivity of communication, we will write our content clearly and for a diverse audience. Where possible, we will make content available in an alternative format on request (for example, in large font).

To assist customers who have visual impairment, wherever possible we will use appropriate font styles and sizes and design our written and online communications to maximize readability.

We encourage the use of several screen reader software applications available that convert on-screen text to speech. This includes free online applications, such as NVDA (NonVisual Desktop Access) for Microsoft Windows, which can be downloaded to your computer.

Identifying Support Needs

If a person is identified as a vulnerable customer, we will review additional support or assistance requirements, and where appropriate, we will discuss this with them. We will prioritize their requirements and attempt to provide assistance we are reasonably able to and to the best of our ability.

Permission to Document Support Needs

We will ask the vulnerable customer for permission to keep a record of the support or assistance required so that this can be referenced in the future to support the person if needed.

5. Making it Easier for Our Customers

Extending Timeframes for Document Submissions and Service Requests

Vulnerable customers living in isolation and/or remote and regional communities may have trouble meeting their obligations to provide us with documents and to take part in assessments (for example, technical assessments) within the timeframes we set. We will work with these customers to implement appropriate

arrangements, including extending timeframes and working with relevant partners to extend timeframes where possible.

Meeting Identification Requirements

Some vulnerable customers may require support meeting identification requirements necessary for certain transactions. We will take a flexible approach to these requirements in line with our legal obligations (for example, using alternative customer identification methods) while continuing to comply with our obligations under the law.

Difficulties Having Documents Witnessed

If a vulnerable customer has difficulties having documents witnessed, which are needed to complete a transaction, we will, where possible, facilitate an electronic document witnessing service that meets the requirements of the law for witnessing documents.

Difficulties Engaging with the Company on Service Issues

Service issues can be difficult to work through, particularly where the issues are complex. We will assist or arrange for relevant partners to assist vulnerable customers to understand our requirements, complete service request forms, understand and meet other requirements, and collect reports including obtaining technical reports (where possible).

Illness

If a customer is unable to engage with us due to a significant illness or injury, hospitalization, or for other reasons, and that customer wishes to appoint a representative to liaise with Advanced Solutions AU Pty Ltd, we will work with the

customer to have the representative authorized for this purpose. This will include (where necessary) contacting the customer to discuss authorization requirements and the representative to discuss the range of activities they are and are not authorized to undertake on behalf of the customer.

Low Level Literacy

A customer may have a low level of literacy in reading, writing, or numeracy. Respectful of this, we will aim to write all content in plain English targeted at an appropriate level of literacy to meet the needs of our customers.

Where a customer is identified as having difficulty understanding our communications, we will work through the content with them, explain what it means, and how it may apply to their circumstances, taking into account our legal obligations on the provision of financial advice services. If we identify that the customer may need financial advice, we will, with the permission of the customer, refer the customer to our financial advice team for additional support.

If we operate an office that is close to the customer's residential location, we may arrange to meet the customer face-to-face to provide further support.

Low Financial Literacy

If we identify that a customer has a low level of financial literacy and is having difficulty understanding the information we have provided to them and how it applies, we will contact the customer to talk through the information with them, explain what it means, and how it may apply to their circumstances, taking into account our obligations on the provision of financial advice services. If we identify that the customer may need financial advice, we will, with the permission of the customer, refer the customer to our financial advice team for additional support.

English as a Second Language

If a customer requires the assistance of an interpreter, we will, on request, provide access to an interpreter so that we can communicate effectively with the customer. We may choose to use a member of staff if that option is available for this purpose. If that staff member is unable to communicate effectively with the customer or there is no staff member who can assist the customer in their nominated language, we will then seek the services of an external interpreter who speaks the language nominated by the customer. Our preferred interpreter service provider is outlined in Section 6.

Customer under a Guardianship, Administrator, or Power of Attorney Arrangement

If a customer is under the care of an appointed guardian, administrator, or a person who holds an enduring power of attorney in respect of the customer, provided we are satisfied that we can continue to meet our legal obligations to the customer, we will communicate directly with the guardian, administrator, or the person who holds the enduring power of attorney and/or the customer as appropriate or directed through the written arrangement and accept payment instruction from them. We will seek evidence of the arrangement in writing and then honor that arrangement.

Natural Disaster Support

Natural disasters and catastrophic events in Australia can include heatwaves, bushfires, droughts, floods, severe storms, tropical cyclones, earthquakes, pandemics, tsunamis, and landslides. Where a natural disaster occurs, we will implement procedures to assist customers who may be vulnerable during that time or as a result of that event, including using any of the processes outlined in this guidance document to assist our customers. We will prioritize inquiries and transactions in these circumstances, particularly those that will provide financial

support to impacted customers and will make information available on our website to guide customers through this period.

Age-Appropriate Support

Very young customers and older/elderly customers may be more susceptible to scams and fraud for many reasons, including an overly trusting approach.

Young customers may also have low financial literacy due to inexperience. When contacted by young customers, we will ensure they understand their inquiries, the information we are providing them, and the impact the transactions they are requesting will have on them.

We will include a focus on identifying red flags that may indicate that they are being scammed, defrauded, or influenced by others in their interactions and requests. Where a red flag is identified, actions taken to support the young customer may include speaking to them via telephone to validate a request, flagging their record, or delaying a transaction until we are satisfied that the request is not being made under duress.

In respect of our older customers (generally considered to be 65 and over), if we identify that they have difficulty accessing information and online forms, we will make these documents available via an alternative method such as in hard copy and/or via post. In supporting these customers, we will include a focus on identifying red flags that may indicate that they are having difficulty with our processes and requirements or being scammed or defrauded so that we can provide additional support. This may include walking them through forms and requirements, helping them to complete forms, referring them to our financial advice team where appropriate, and providing them with additional information.

In respect of our older and 'elder' customers, we recognize the risk of elder neglect, elder emotional or psychological abuse, and elder financial abuse. Elder financial abuse is defined as the mismanagement or improper use of an older person's finances.

Whilst not all customers in this age group face these risks and many retain their independence and are highly capable, we will be alert to red flags that may indicate that these scenarios may be applicable to the customer. If a red flag is identified, actions taken to support the customer may include speaking to them via telephone to discuss their needs further, flagging their record, or delaying a transaction until we are satisfied that the request is not being made fraudulently, subject to a scam, or under duress.

Support in Lodging a Complaint

All customers are able to submit a complaint or raise dissatisfaction, receive ongoing updates about the management of their complaint raised, and receive reasons and support in respect of the final decision.

Our Complaints Management Policy and Public Guidance document sets out the processes and timeframes in which we will manage complaints.

In the complaints management process, we will ensure vulnerable customers have reasonable and equitable access to the complaints process, including in relation to the decisions and/or conduct of any of our service providers. Complaints from vulnerable customers will be escalated and resolved as quickly as possible.

We recognize that where a complaint relates to the release of funds or services, escalating the complaint can assist in relieving financial stress if the complaint is upheld and the resolution is approved.

We also recognize that early intervention may help to escalate a resolution decision and make necessary changes to support the customer.

In relation to any legal proceedings or actions that we have advised the customer we may take, we recognize that escalated management and resolution of the complaint may help to resolve matters before these actions are necessary. Where appropriate, we will defer any actions that we may need to take until the complaint has been resolved.

6. Appointing a Representative

Customers are able to appoint a representative to assist them and to represent them on matters related to Advanced Solutions AU Pty Ltd and its products and services. We will only deal with representatives who are properly authorized by the customer in order to protect their privacy and to meet our privacy obligations to them.

Examples of representatives who we may deal with include (but are not limited to):

- a person appointed as the customer's guardian, administrator, or a person who holds an enduring power of attorney in respect of the customer;
- a family member, relative, or friend;
- a financial adviser or financial counsellor;
- a legal representative;
- an accountant;
- a member of parliament;
- a person who acts as a representative under a commercial (fee-charging) arrangement with the customer.

Our 'Authority to Access Information' form can be used for this purpose.

When appointing a representative, we recommend customers consider the following key points before making the representative appointment:

- the person will always act in the customer's best interests;
- the person will not have a conflict of interest by having a financial interest in the matter, for example, if the matter relates to a complaint or service request;
- the person has the time available to deal with the issue on behalf of the customer;
- if entering into a fee-charging arrangement with the person (if using a professional service provider specializing in this type of service), the customer is satisfied that the fees are properly explained, reasonable for the services required, and that the representative has the expertise to undertake the role required of them.

If we have concerns when dealing with the customer's representative, for example, that they may not be acting in the customer's best interests or they are not cooperative, we may decide to contact the customer to discuss this. If we are unable to resolve our concerns, we may decline to deal with the representative and instead deal directly with the customer until they appoint an alternative representative.

7. External Support Services

Shown below are some of the support services that we may access ourselves or refer a vulnerable customer to, to help meet their needs. We may use other support services we identify from time to time or that customers refer us to.

Aboriginal and Torres Strait Islander Support Services

- **13Yarn:** A free and confidential counselling service run for, and by, Aboriginal and Torres Strait Islander People.

Phone: 13 92 76

- **First Nations Foundation:** Indigenous financial wellbeing foundation providing financial education, training, and information, including support to reconnect indigenous peoples with their superannuation.

Website: [First Nations Foundation](#)

- **Mob Strong, Debt Help:** Part of the Financial Rights Legal Centre, this service is a free legal advice service about money matters for Aboriginal and Torres Strait Islander people from anywhere in Australia.

Phone: 1800 808 488

Website: [Mob Strong Debt Help](#)

Disability Support Services

- **Disability Services Australia:** Provides assistance with living independently, improving relationships, finding employment, connecting socially, training courses to enhance career opportunities, and support for behavior therapy, psychological assessments and therapy, speech pathology, and occupational therapy.

Website: [Disability Services Australia](#)

- **National Relay Service:** Provides support to people who are deaf and/or find it hard hearing or speaking with people who use a phone. Depending on the type of call, a Relay Officer will change voice to text or text to voice and AUSLAN to English or English to AUSLAN.

Website: [National Relay Service](#)

Employer Support Services

- **Mental Health At Work:** Provides a full spectrum of mental health services for workplaces.

Website: [Mental Health At Work](#)

- **SuperFriend:** Works with industry partners to help organizations navigate their workplace wellbeing journey with strategic support, workplace training, and resource solutions; advocating for policy, regulation, and workplace system change; and providing insights to industry, government, and workplaces.

Website: [SuperFriend](#)

Family and Domestic Violence Support

- **1800 RESPECT:** A national, confidential domestic, family, and sexual violence counselling, information, and support service.

Phone: [1800 737 732](#)

Website: [1800 RESPECT](#)

Financial Support Services

- **ASIC MoneySmart:** This online government service provides financial guidance including tips on managing money, borrowing and credit, insurance, superannuation, investing, scams, and more.

Website: [MoneySmart](#)

- **National Debt Helpline:** A free professional confidential and independent financial counselling service. They are not a lender and do not sell anything or make money from the people that use the service. The website provides step-by-step information on how to manage different types of debt and includes information on complex situations such as domestic and family violence and financial abuse, natural disasters, mental health, and prison.

Phone: [1800 007 007 \(9:30 am to 4:30 pm Monday to Friday\)](#)

Website: [National Debt Helpline](#)

Language Support Services

- **Auslan Signbank:** A language resource for Australian Sign Language. Available resources include a dictionary; ability to search for signs related to medical and health topics; ability to search for signs related to education and teaching topics; videos of deaf people using the listed Auslan signs; information on the deaf community in Australia; and links to Auslan classes.

Website: [Auslan Signbank](#)

- **Translating and Interpreting Service (TIS National):** TIS National is an interpreting service provided for people who do not speak English and for agencies and businesses that need to communicate with their non-English speaking clients. They provide immediate phone interpreting, ATIS automated voice-prompted immediate phone interpreting, pre-booked phone interpreting, video remote interpreting, and on-site interpreting. Additionally, they provide free document translations for people settling permanently in Australia to support participation in employment, education, and community engagement. Permanent residents and select temporary or provisional visa holders are able to have up to ten eligible documents translated into English within the first two years of their eligible visa grant date.

Phone: [131 450](#)

Website: [TIS National](#)

Legal Support Services

- **Economic Justice Australia:** Members of Economic Justice Australia are specialist community legal centres that provide free advice on issues like appealing a Centrelink decision, Centrelink debts, difficulties applying for a Disability Support Pension, Compensation Preclusion Periods, and more.

Website: [Economic Justice Australia](#)

- **Community Legal Centres:** Services include specialized legal advice, advocacy, and counselling in financial services, particularly consumer credit, banking, and debt recovery.

Website: [Community Legal Centres](#) (This will take you to a national site where you can access their locator function to identify a legal resource in your state.)

- **Legal Aid Commissions:** These are state-based and provide services to disadvantaged clients in many areas of criminal, family, and civil law, including free, confidential face-to-face legal advice and legal representation for eligible clients.

Website: [Legal Aid Commissions](#)

Crisis and Mental Health Support

- **Beyond Blue:** A mental health organization focused on supporting people affected by anxiety, depression, and suicide. The website offers mental health check-ins, support finding a mental health professional, and articles and information about mental health.

Phone: [1300 224 636](tel:1300224636)

Website: [Beyond Blue](#)

- **Black Dog Institute:** The website offers resources and digital tools such as self-help programs, mental health personal assessment tools, anxiety, depression, and bipolar self-tests, factsheets, and finding support groups (both online and in person).

Website: [Black Dog Institute](#)

- **Gambling Help Online:** The service offers free 24/7 chat and email counselling and support services; professional counsellors with expertise in problem gambling and online services; a stepping stone for further help-seeking, including telephone and face-to-face gambling services; and extensive website content, self-help information, and weblinks for additional support.

Phone: [1800 858 858](tel:1800858858)

Website: [Gambling Help Online](#)

- **Lifeline:** 24/7 crisis support and suicide prevention services for anyone experiencing distress.

Phone: [13 11 14](tel:131114)

Website: [Lifeline](#)

- **Mates in Mining:** 24/7 suicide prevention and support for the mining industry.

Phone: [1300 642 111](tel:1300642111)

Website: [Mates in Mining](#)

- **SANE Australia:** SANE is for people with recurring, persistent, or complex mental health issues and trauma, and for their families, friends, and community. They offer a free counselling service that can be accessed via phone, chat, or email, as well as factsheets and guides on a range of complex mental health issues.

Phone: [1800 187 263](tel:1800187263)

Website: [SANE Australia](#)