

PRIME SUPER

Vulnerable persons guidelines

November 2022

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1. Overview

Prime Super recognises that not all members are the same and that some members may require additional support when contacting the Fund.

We offer a range of services to help members navigate the superannuation environment. We have a process in place to identify vulnerable members and we encourage members to let the Fund know if they require additional support so that we can empower our members to maximise their understanding and make informed decisions when dealing with the Fund about their financial needs.

2. Purpose

This policy will assist in identifying vulnerable members and providing the necessary tools to best assist them while engaging with the Fund regarding insurance and claims matters.

3. Who is a vulnerable member?

A person's vulnerability may be due to a range of factors including but not limited to:

- Age
- Disability
- Financial distress
- Family violence
- Aboriginal or Torres Strait Islander identity
- Mental health condition
- Non-English-speaking background
- Low level literacy
- Isolation social, geographical
- Incarceration
- Natural disaster

If a vulnerable member is identified, the trustee will ask for the member's permission to keep a record of the support or assistance they require.

4. Assistance and support for vulnerable members

In working with all our members, we want to ensure that all communications are inclusive and show empathy and understanding. We encourage staff dealing with members to be sure to listen to the member and consider the member's needs in all dealings. Be proactive in offering additional support where it may be required.

The Fund offers a range of support options to assist vulnerable members as detailed in the following pages.

4.1 Accessing and providing information

Information for members can be obtained:

- online at primesuper.com.au
- by calling our contact centre on 1800 675 839 who can either email or send any documents
- by making a booking with one of our member specialists to discuss any matters
- at our head office in the Melbourne CBD, office in Sydney and via various regional managers.

We understand that people living in isolation or in remote and regional communities may have trouble meeting their obligations to provide us with documents and to take part in assessments in the timeframes we set. We will take this into account when going through claims processes.

If a vulnerable member has difficulties obtaining a witness for documents needed to complete a transaction, we will where possible, look at other alternatives to meet the requirements.

4.2 Understanding superannuation

We understand that superannuation can be complex, and we aim to write our content clearly using plain language.

If we identify that a member requires additional help in understanding the information we have provided to them, we will contact them to talk through the information. If we identify that the member may need financial advice, we will with the permission of the member, refer the member to our financial advice team for additional support.

4.3 Elder abuse

We encourage staff to be aware of elder abuse both emotional and financial.

We recognise that older customers may be more susceptible to financial abuse. In supporting these members, we will look for signs that may indicate that they are having difficulty with our processes and requirements or that they may be being scammed or defrauded so that we can provide additional support. Red flags may include unusual transactions, a member showing signs of stress or dealing with a third party who stops all access to the member. This may include walking them through forms and requirements, helping them to complete forms, speaking with them via telephone to discuss their needs further, flagging their record, delaying a transaction until we are satisfied that the request is not being made fraudulently or under duress and the member is not subject to a scam.

4.4 Giving others access to a member account

Under a third-party authority, a member can give specific people access to their account details. This could include any help a member may need with making a claim.

A member can use the 'Authority to obtain super fund information' form available on the Prime Super website to provide third party access to their account.

We will also accept a power of attorney appointing an individual or an organisation to manage or assist a member with their personal or financial affairs. It can be for a fixed or enduring period and stops when the member dies. The power of attorney should be in relation to a member's financial affairs.

The same applies if a member is under the care of an appointed guardian or administrator. We will seek evidence of the arrangement in writing.

If we have concerns when dealing with a member's representative, for example, that they may not be acting in the member's best interests or they are not cooperative, we may decide to contact the member to discuss.

4.5 Support for members in financial distress

Superannuation law allows the release up to a maximum of \$10,000 (less tax) from a super account prior to retirement in cases of severe financial hardship. To access their super in these circumstances a member must meet the eligibility conditions set out in superannuation legislation. Members can contact the fund directly to obtain the relevant documents.

Members may also be able to obtain early access to part of their superannuation on compassionate grounds. We recommend members visit the Australian Taxation Office (ATO) website: ato.gov.au/individuals/super/withdrawing-and-using-your-super/early-access-to-your-super/ or the Fund for further information.

Other free resources and helplines can be provided to members to seek further help and support. A financial counsellor can help members understand their options and help navigate the best solutions based on their personal circumstances. Members can find a financial counsellor by visiting financialcounsellingaustralia.org.au or by calling the National Debt Helpline on 1800 007 007 from anywhere in Australia.

4.6 Support for members who are the victim of family violence

It is critical that members who are the victim of family violence are protected at all times. Their information should not be provided to any third party without first calling them. You can recommend the placement of an additional password on the account to provide a second layer of protection. The account should not be discussed with any person who cannot provide the password.

These members may also need extra time to provide information.

These members may also benefit from financial hardship options for accessing their superannuation.

The contact number for family violence counselling can also be provided to the member for additional support on 1800RESPECT or 1800 737 7988.

4.7 Support for Aboriginal and Torres Strait Islanders

Flexibility may be needed in relation to communication and the requirements for documents when documents are not accessible or members are living in remote communities; extra time may be needed.

Our claims managers will take a flexible approach and take reasonable measures to verify and identify members in line with AUSTRAC guidance.

Additional resources include:

- National Indigenous Critical Response Service 1800 805 801 for help with mental health and suicide
- Mob Strong, debt help 1800 808 488 for assistance with financial issues.

4.8 Mental health assistance

Consideration needs to be given to the member's mental capacity to make informed decisions or to understand claim requirements etc.

Staff who deal directly with members may also be faced with potential threats of suicide. Threats of suicide should be escalated immediately, and the police called to complete a welfare check if there are concerns for the member's welfare.

Debriefing and extra support for staff will also be made available.

Other resources can be offered to the member including:

- Beyond Blue 1300 22 46 36
- NSW Mental Health Line 1800 011 511
- Suicide Call Back Service 1300 659 467
- Lifeline 131 114.

4.9 Assistance with insurance claims

Making an insurance claim can be a difficult process. The Fund has a dedicated Insurance Team to help members in assessing eligibility to make a claim and to understand what the process of making a claim involves. Members are encouraged to contact the Fund for assistance on insurance claim matters. It is important that members:

- Understand the claims process
- Are assisted with the completion of forms
- Who require additional support from a representative or family member are acknowledged and allowed for in all reasonable ways by the Trustee
- Have a dedicated case manager to provide consistency or ensure a smooth handover to the person taking ownership
- Refer matters to the Trustee where discretion may be required for providing, for example, certified identification.

4.9 Interpreting services

If a member requires assistance because English is not their first language, we will arrange a call with someone who speaks their language or arrange an interpreter service so that they can effectively communicate to understand their superannuation.

To access the service please call our contact centre on 1800 675 839 and advise the language or ask for assistance.

4.10 Alternative identification

There may be some circumstances where members are unable to meet the Fund's usual proof of identity requirements. In limited circumstances, the Fund will take a flexible approach and modify verification procedures whereby we request that members provide "reliable and independent documentation" as long as the Fund is still compliant with the law. These will be reviewed on a case-by-case basis.

4.11 Natural disaster assistance

Natural disasters in Australia can include bushfires, droughts, floods, storms and tropical cyclones. Where a natural disaster occurs, we will implement procedures to assist members and prioritise enquiries and transactions, particularly those that will provide financial support to those impacted.

4.12 LGBTQI support, biological sex and gender identity

Staff interacting directly with members should ensure awareness of LGBTQI issues and not make assumptions as to gender or gender identity when dealing with a member or their

partner or spouse. Members of the Fund will have the ability to have their gender identity recorded accurately and be communicated with accordingly.

The following websites and links provide resources to assist:

- Intersex Human Rights Australia (IHRA)
- https://ihra.org.au/style
- https://interactadvocates.org/wp-content/uploads/2017/01/intersex-mediaguideinteract.pdf
- https://www.ag.gov.au/sites/default/files/2020-03/AustralianGovernmentGuidelinesontheRecognitionofSexandGender.pdf.

5. Training

Prime Super will aim to ensure that all relevant employees and third-party providers have sufficient training so that they are aware of the vulnerable member policy and can identify vulnerable members.

6. Other resources

Staff should be aware of the additional resources provided below should members require other support:

- Auslan auslan.org.au
- Australian Institute of Aboriginal and Torres Strait Islander Studies (AIATSIS)
 1300 224 636 aiatsis.gov.au
- Beyond Blue 1300 22 4636 beyondblue.org.au
- Black Dog Institute blackdoginstitute.org.au
- Centre of Mental Health Education cmhe.com.au
- Disability Services Australia dsa.org.au/services
- Family Violence Counselling 1800 RESPECT or 1800 737 732 1800respect.org.au
- Gamblers Help 1800 858 858 gamblershelp.com.au
- Lifeline 13 11 14 lifeline.org.au
- Mental Health at Work mhatwork.com.au
- Mental Health Council of Australia www.mhca.org.au
- Mind Matters 1800 007 007 mindmatters.edu.au
- Welfare Rights Centre 1800 226 028 welfarerightscentre.org.au
- SuperFriend superfriend.com.au
- SANE Australia sane.org.