



CUSTOMER VULNERABILITY POLICY

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INTRODUCTION

This policy sets out the EML Group (EML) commitment to assist customers in accordance with specific requirements outlined in the:

- Life Insurance Code of Practice (LICOP)
- Best practice guidelines developed by the Financial Services Council (FSC)
- EMLs internal policies and procedures

The objective of this policy is to provide a practical understanding of how vulnerable customers are supported and maintain an internal guidance tool to assist our staff in their engagement with stakeholders. The policy demonstrates our commitment to accommodating the unique needs of customers and to provide comprehensive support as required.

“As a third-party claims management service provider, we are committed to delivering excellent service through [a member-centric approach](#). Our standards-based model reflects this commitment and ensures we consistently provide a positive experience for both member and customers.”

EML ensures that all third-party service providers, including claims managers and external support agencies, comply with the principles and obligations outlined in LICOP Version 2 (effective 1 March 2025). The Customer Commitments ensure stakeholders are at the heart of our practices and are intended to help them understand how important they are to EML, what they can expect and ensure they feel supported throughout their customer service journey.

EMLs core Customer Commitments include:

- We will listen
- We will work with our customers
- We will guide
- We will engage with customer with empathy, compassion, and respect

Our Customer Commitments have been developed through customer and stakeholder feedback. The Customer Commitments incorporate behaviours that inform the Service Standards and detail we will provide timely, transparent, and supportive customer service.

The Service Standards establish the basis for our customer-centric environment, enabling our staff to recognise and prioritise meeting the needs of customers, particularly those who are vulnerable, in order to develop lasting customer relationships.

Service Standard Principles	
Communication	Responding to customers in a timely manner and conducting quality customer interactions focused on improving the customers understanding of the claims process.
Support	Engaging with the customers in a way that best suits their needs and connecting customers to support services.
Commitment	Demonstrating commitment to the customer by providing timely and early assistance, maintaining regular contact and resolving all concerns and queries as soon as possible including notifying the customer of how we maintain privacy during verbal contact.
Feedback	Seeking customer feedback towards implementing continuous improvement initiatives.

In accordance with the Life Insurance Code of Practice Version 2 (effective 1 March 2025) (LICOP), EML recognise that a customer experiencing vulnerability can be affected by a range of factors not limited to;

- Disability and Injury
- Mental and Physical health conditions
- Family violence
- Language and literacy barriers
- Remote location
- Cultural background and Aboriginal or Torres strait islander status
- Self-harm or Suicidal behaviours
- Financial distress and age

These vulnerabilities can stem from the compensable injuries or outside the scope of the claimed policy.

We maintain a holistic approach to handling claims for customers experiencing vulnerability. We understand that vulnerability can present in different ways at different stages during the claim lifecycle and a tailored approach is often required to support the needs of customers.

Our approach includes empowering internal stakeholders with:

- Knowledge and expertise in identifying and understanding customer vulnerability
- Ability to implement customer support mechanisms
- Training in application of Life Insurance Code of Practice
- Application of behavioural Insights
- Application of motivational interviewing communication
- Application of solutions focused communication techniques
- Training and coaching in application of Biopsychosocial framework

- Training in the practical application of technical knowledge

We incorporate communication practices and learning and development strategies that foster a superior customer service experience to effectively support vulnerable customers.

TRAINING

We provide continuous learning and development to all staff members in line with the principles and guidelines set out by LICOP, our internal Claims Management Model and overarching employee training policy. This consists of holistic training specialising in customer vulnerability identification and management and support of claims under the scope of LICOP.

Training processes are reviewed annually or as required subject to regulatory and governance reform.

COMMUNICATION

Stakeholder Communication can significantly affect how we identify, record and evaluate Customer vulnerability. All customer-facing employees receive training to consider customer needs and employ diverse communication techniques, ensuring timely acquisition of sufficient, accurate, and mutually agreed-upon information.

Several vulnerabilities can be overcome by having strategic, thoughtful and clear communication.

We ensure that as per the Customer Commitments that all contacts are meaningful and underpinned by the following approaches:

BEHAVIOUR INSIGHTS

Staff are encouraged to apply Behavioural Insight techniques to enable customers to take ownership of their own recovery and where relevant, return to work. This includes positive and encouraging verbal and written communication, ensuring clear and simple messaging supported by rationale and reasoning to build trust and rapport. It also includes, maintaining increased focus on collaborating with external support agencies and minimising duplication of information.

MOTIVATIONAL COMMUNICATION

Staff are encouraged to apply Motivational Interviewing (MI) techniques when dealing with customers to identify their intrinsic motivations and personal needs. This approach enables a better understanding of vulnerabilities towards determining the most suitable form of assistance. MI also influences how customers, in turn, view, understand and accept their vulnerabilities, including adopting recommended support.

BIO-PSYCHOSOCIAL FRAMEWORK

We utilise the Bio-Psychosocial Framework for Health and Illness to understand the impact an injury, vulnerabilities and personal issues can have on a customer's engagement with the claims process. Our claims management model encompasses regular strategic assessments to identify the relationship between biological, psychological and social factors to help determine the cause, manifestation and outcome of wellness and disease, to ultimately ensure the most adept support is provided.

CUSTOMER COMMUNICATION PREFERENCES

We will enquire about a customer's preferred approach to communication and verify the preferred frequency, time and most suitable method of communicating with the customer or support person. This will include their preferred mode of communication such as phone messages, e-mail or postal.

If a customer elects to appoint a support person or representative to communicate on their behalf, where applicable EML will make the customer aware of the requirement to submit this request in writing and share the name and contact details of the person elected.

PRIVACY IDENTIFICATION CHECK ON ALL PHONE CALLS

We take a flexible approach to identification and verification of customers and their representatives during the claims management process. We ensure to acquire sufficient personal identification data at claim lodgement and adopt a flexible approach thereafter to accommodate customers who may have limited information available to verify their identity. Where specific information is required, we will work with the customer to identify a suitable solution.

CLAIM HANDOVER

During the handover of a claim between Case Managers, key information will be maintained and brought to the new Case Manager's attention to ensure a smooth and effective transition of information and responsibilities to meet customer service requirements. We ensure to record and maintain all relevant information pertaining to a customer's vulnerability on the claim within the relevant Handover notes. This ensures the customer does not have to repeat details of their vulnerability as to not exacerbate existing conditions and ensure the appointed Case Manager can provide relevant support.

COMMUNICATION ASSISTANCE SERVICES

EML will arrange for and pay for an interpreter if a customer tell us that they need interpreter services or if it is identified that one is required. If customers require additional support, such as Relay Services they will be provided with information on how to engage this service.

SUPPORTING CUSTOMERS

We operate in accordance with Service Standards and the LICOP code to ensure customers experiencing vulnerability are identified early, communicated with in a timely manner and made to feel supported.

We will endeavour to identify the most suitable type of support to ensure customers are provided with the care and consideration that is most suited to their needs.

OUR CUSTOMER COMMUNICATION APPROACH INCLUDES:

- Treat customers (including family members, carer, or support persons as applicable) with empathy, compassion, and respect.
- Exercise discretion and sensitivity in communicating with and requesting information from customers
- Enquire and gather information from customers through behavioural insights and motivational communication techniques
- Assist customers by finding a suitable, sensitive, and compassionate support within practical timeframes.
- Minimise excessive customer enquiry of vulnerability where it has been identified this may adversely impact the customers health and condition.
- Respect a customer's decision if they convey to our staff or a staff member identifies that a customer has decided to not engage support services.

OUR CUSTOMER SUPPORT INITIATIVES INCLUDE:

- Provide tailored recovery and treatment provider support to customers such as a Rehabilitation Consultant, Physiotherapy/Exercise Physiologist and Counselling Services
- Recognise, allow it in all reasonable ways and document on the claim, if a customer requires a support person such as a lawyer, customer representative, interpreter, relay service, family member, carer or friend.
- Assist customers by providing contact details for the appropriate person or support service who may be able to assist with personal circumstances.
- Be sensitive to the logistical impact of customers experiencing vulnerability. Our Case Managers are equipped with diversity awareness for this purpose.
- Ensure that our Case Managers are flexible in assisting customers to meet their verification and identification requirements as per the AUSTRAC guidance
- Consider if a customer is suffering financial hardship and provide further information on how we can assist in accordance with our "Financial Hardship Procedure".
- Consider if a customer is demonstrating suicidal idealisation or self-harm behaviours and provide further information on how we can assist in accordance with our High-Risk Protocol and internal Blue Card Procedure.

Consider if a customer is suffering from domestic violence, provide further information on how we can assist in accordance with our "Family Violence Policy".

AVAILABLE SUPPORT

We understand the difficult and sensitive nature of vulnerabilities and will endeavour to provide the most suitable support to customers. This table provides a summary of prevalent vulnerabilities and some available options available to us to assist and support. As all customers' situations are unique, the support offered will be tailored to the individual. **Support will be provided subject to inclusion with individual policy entitlements and insurer approval.**

Type of customer vulnerability	Description*	How we endeavour to support customers?
Disability or Injury	Disability or Injury can present vulnerabilities stemming from the physical body and create challenges in activities of daily living, cognition, physical/movement abilities, and emotional state.	Staff will act with awareness to support individuals suffering from a disability or injury and identify appropriate support services. Additional support may be suggested subject to availability of external, community and/or government support services.
Mental and Physical Health Condition	<p>Mental health conditions include undiagnosed/diagnosed psychological conditions, cognitive or behavioural impairment, impairment due to intellectual disability, mental illness.</p> <p>Physical Health Conditions stemming from pre-existing health disposition or new injury/illness can present physical, psychological and social engagement including employment limitations effecting mobility and dexterity.</p>	<p>Staff will communicate with customers in a considerate and empathetic manner with regard to their conditions to identify suitable support options.</p> <p>Suitable support may include:</p> <ul style="list-style-type: none"> Facilitation of case conferences to allow providers a multidisciplinary approach to treatment and care Provision of appropriate psychological/physical treatment services Providing contact details of people with specialist training and experience
Family violence	Family violence means violent, threatening, or other behaviour by a person that coerces a member of the person's family, or causes the family member to be fearful, by way of: Physical violence, emotional, psychological, sexual or financial or economic abuse and damage to property.	Assist customers in accessing the appropriate support services where possible, by providing contact details for people or services with specialist training and experience who may be able to assist in personal circumstances. Refer to Additional Support Services below or refer to our website for a copy of our Family Violence Policy.

<p>Language and literacy barriers</p>	<p>Language and comprehension competency levels may differ amongst consumers whereby challenges can be present in having English as a secondary language. This can affect competency levels on reading, writing, numerical, financial and digital literacy skills.</p>	<p>Staff will communicate with customers in a patient, professional and clear manner including speaking or writing in plain English.</p> <p>Staff will attempt to identify the best medium of communication such as email/phone/text most suitable to each customer and ensure suitable support options are provided.</p> <p>If ongoing communication requires a tailored approach, suitable support options will be considered which may include:</p> <p>Arrangement and/or notification of Interpreter Services or Relay Services</p> <p>Advising customers to engage a support person to communicate on their behalf.</p>
<p>Remote location</p>	<p>A customer's place of residence can present practical challenges in participating in policy covered treatment, insurer arranged medical examinations and other engagements with respect to distance and location.</p>	<p>Staff will endeavour to identify suitable transport and/or accommodation support options within policy entitlements. Suitable support may include:</p> <p>Arrangement and/or cost coverage of travel i.e. Taxi/Shuttle/Flight services</p> <p>Arrangement and/or cost coverage of hotel accommodation</p> <p>Provision of travel and accommodation services is subject to being reasonable, necessary and practical and will consider criteria not limited to; purpose of travel, distance and availability of transport i.e., to and from Insurer arranged Medical Examination Assessments</p>
<p>Cultural background and Aboriginal or Torres Strait Islander status</p>	<p>Varying Cultural backgrounds can present a range of vulnerabilities stemming from a difference in comprehension, understanding, assumptions, attitudes, interpreting behaviours, social cues and overall ability to communicate.</p> <p>Customers from an Aboriginal, Indigenous or Torres Strait Islander background may have challenges stemming from cultural difficulties. These may present as a number of vulnerabilities as listed.</p>	<p>Staff will communicate with customers in a considerate, patient and adaptable manner to understand their cultural vulnerability and identify a suitable way of working and support option. Suitable support may include:</p> <p>Adjusting communication approach to identify the style and depth of conversation that best aligns with the customers comprehension and cultural understanding.</p> <p>Asking questions and enquiring in different ways to find approach that best suits the customer.</p> <p>Arrangement and/or notification of Interpreter Services</p> <p>Arrange and/or provide contact details for people with specialist training and experience who may be able to assist in personal circumstances</p>

<p>Suicidality or suicidal behaviours</p>	<p>This can originate from a complex mix of adverse life events, social and geographical isolation, cultural and family background, socio-economic disadvantages, genetic makeup, mental and physical health, the extent of support from family and friends amongst other contributing factors.</p>	<p>Staff are provided with information and procedures about assessing and responding to self-harming or suicidal behaviours - High Risk Protocol Training and an internal Blue Card Response Procedure.</p> <p>Staff subject to a self-harm alert or suicide risk alert have access to emergency support services aligned to EML at any given time and trained in implementation of support services.</p>
<p>Financial hardship or distress</p>	<p>Financial distress can occur in instances where customers have insufficient funds to be able to pay their claim costs such as excess, personal bills and expenses.</p>	<p>Assist customers by providing contact details for people or services with specialist training and experience who may be able to assist with financial circumstances.</p> <p>If applicable, put any recovery action against the customer on hold until our enquiries are complete.</p> <p>Consider fast-tracking review of financial support on the claim.</p> <p>If reasonably required, request customers to complete the Financial Hardship Application Procedure including provision of supporting evidence for EML to review and determine urgent financial assistance.</p>
<p>Age</p>	<p>Age is acknowledged as a potential vulnerability due to its correlation with experience at different stages in a person's life and propensity for exposure to other types of vulnerabilities that accompany aging.</p>	<p>We will accommodate any vulnerability stemming from a customer's individual circumstances to assist in alleviating their difficulty in communicating and/or participating in meetings/assessments during the claims process towards recovery.</p>
<p><i>Please note that certain community and government supports, or services are not provided or compensable under a claim. These are additional and alternative options that a customer and their support network may be able to access in the community, online and through the government. Customers should contact the organisation directly to confirm any specific eligibility criteria, what services they offer, applicable costs and what their process is. Where practical we will provide information to direct customers to relevant services.</i></p> <p><i>*The Items in the 'Description' column are a non-exhaustive list of vulnerabilities a customer can experience and does not intend to provide a definition, rather guidance for how and why this can present.</i></p>		

PRIVACY AND CONFIDENTIALITY

In requesting, enquiring and receiving customer information, EML will acquire personal information for the particular function of understanding a customer's vulnerability and informing how to provide suitable assistance.

EML is bound by the Privacy Act 1988 (Cth) (Privacy Act), including the 13 Australian Privacy Principles (APPs) which protect personal information. EML and its subsidiaries respect a customer's right to privacy and value the trust they place in us to handle their personal and sensitive information.

Maintaining the privacy of all personal and sensitive information entrusted to us is paramount. In addition to the provisions of the Privacy Act, we are also bound by the LICOP and GICOP code guidelines in the collection, use and disclosure of information relating to workers compensation claims.

Surveillance Practices

In accordance with LICOP Version 2 (effective 1 March 2025), EML restricts the use of surveillance to protect customer privacy. If surveillance is deemed necessary, it will be conducted transparently and ethically, with consideration for the customer's circumstances and rights.

ADDITIONAL SUPPORT SERVICES

Organisation	Beyond Blue
Information	Beyond Blue provide free mental health support and assistance for people experiencing mental health conditions such as anxiety or depression including guidance on finding appropriate mental health treating practitioners.
Location	Australia Wide
Availability	24 hours a day, 7 days a week
Website	https://www.beyondblue.org.au/
Contact Number	1300 224 636

Organisation	MensLine Australia
Information	MensLine offers free professional counselling support for men with concerns about mental health, anger management, family violence (using and experiencing), addiction, relationship, stress and wellbeing.
Location	Australia Wide
Availability	24 hours a day, 7 days a week
Website	https://mensline.org.au/
Contact Number	Voice – 1300 555 727 TTY – 133 677 SMS – 0423 677 767

Organisation	Lifeline
Information	Lifeline is Australia's leading suicide prevention service. They are a national charity providing all Australians experiencing a personal crisis with access to 24-hour crisis support.
Location	Australia Wide
Availability	24 hours a day, 7 days a week
Website	https://www.lifeline.org.au/
Contact Number	Phone: 13 11 14

Organisation	1800 RESPECT
Information	This is a counselling and advice service for people experiencing domestic, family or sexual violence.
Location	Australia Wide
Availability	24 hours a day, 7 days a week
Website	https://www.1800respect.org.au/
Contact Number	Phone: 1800 737 732

Organisation	National Debt Helpline
Information	This is a legal advice service providing financial counselling for all persons to help resolve personal monetary debt issues.
Location	Australia Wide
Availability	9.30am to 4.30pm, Monday to Friday
Website	https://ndh.org.au/
Contact Number	Phone: 1800 007 007

Organisation	Mob Strong Debt Helpline
Information	This is a legal advice service providing financial counselling for Aboriginal and Torres Strait Islander persons
Location	Australia Wide
Availability	9.30am to 4.30pm, Monday to Friday
Website	https://financialrights.org.au/getting-help/mob-strong-debt-help/
Contact Number	Phone: 1800 808 488

Organisation	Translating and Interpreting Services (TIS)
Information	This is a government service that supports translation and interpretation needs for individuals from a culturally and linguistically diverse backgrounds. Customers can contact TIS immediately, arrange pre-booked phone conversations and on-site conversations to be present during meetings and/or medical assessments.
Location	Australia Wide
Availability	24 hours a day, 7 days a week
Website	https://www.tisnational.gov.au/
Contact Number	131 450

Organisation	National Relay Service (NRS)
Information	This is a government service that supports individuals who are deaf, have hearing difficulties and challenges speaking on the telephone. Customers can engage the NRS Chat and Captions call function for additional means of communication to meet their needs.
Location	Australia Wide
Availability	24 hours a day, 7 days a week
Website	https://www.infrastructure.gov.au/media-communications-arts/phone/services-people-disability/accesshub/national-relay-service
Contact Number	Voice: 1300 555 727 TTY: 133 677 SMS: 0423 677 767

Policy Approver	Matthew Wilson – Chief Risk Officer
Owner	Amber Addicott – Head of Life and Casualty
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