DXC Insurance Solutions Australia Pty Ltd

Vulnerability Policy

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Table 1.   Change History

Version	Date	Details
1	12.11.2021	Policy reviewed and converted to policy template
2	17.01.2023	Policy reviewed and converted to policy template

This Policy is an on-line document and as such all updates will be made on-line. As soon as a document is printed it ceases to be a controlled document. To ensure that you are reviewing the latest copy of this policy, please access the on-line version available on the DXC Insurance Solutions Portal.

Change Management

The Policy is owned by the Directors and Responsible Managers of DXC Insurance Solutions Australia Pty Ltd. The Policy will be updated periodically in line with statutory and regulator developments and industry practice.

Exceptions, Violations and Queries

Any exception to this Policy must be approved by Policy owner/delegate.

1 Policy Statement

- All people have the right to be treated equally, regardless of their gender, age, race, religious beliefs, disability, sexual orientation or family or social background and have the right to protection from any form of abuse, exploitation, or neglect.

- DXC Insurance Solutions Australia Pty Ltd (DXCIS) is committed to promoting and protecting the welfare and human rights of all people that interact with, or are affected by, our work - particularly those that may be at risk of abuse, neglect, or exploitation. As a company we have no tolerance for abuse, neglect, or exploitation. We will take a survivor-centric approach in all that we do.

- All staff, partners and third parties of DXCIS share responsibility in ensuring protection to all from abuse, exploitation, or neglect. Beyond this, certain people within our company have specific responsibilities, and they must carry out their duties without exception.

- DXCIS has a process for managing incidents relating to vulnerability that must be followed when such an incident arises.

1.1 The Purpose of this Policy

The purpose of this policy is to:

- Help protect people that interact with, or are affected by, DXCIS
- Define the key terms we use when talking about protecting people or Vulnerability
- Set out and develop the way DXCIS manages Vulnerability risks
- Set out the specific roles and responsibilities of persons working in and with DXCIS
- Facilitate the safe management of incidents
- Support a positive and effective internal culture towards Vulnerability

2 The Code of Practice

From 1 January 2021, subscribers to the General Insurance Code of Practice 2020 (Code) must take extra care of small business and individuals who have purchased a retail insurance product and are classified as 'vulnerable' persons.

2.1 When and who does the Code Apply to?

The Code launched on 1 January 2020 but most of its provisions became effective in 2021. One exception is the vulnerability provisions, which applied from 1 July 2020.

The Code applies to subscribers and their agents. Those agents may deal with insured persons and or claimants at the time the policy is purchased or at other times, like when a claim is made or is being managed.

2.2 What is Vulnerability?

'Vulnerability' means protecting the welfare and human rights of people that interact with, or are affected by, DXCIS, particularly those that might be at risk of abuse, neglect, or exploitation. This refers to any responsibility or measure undertaken to protect a person from harm.

'Abuse, neglect or exploitation' means all forms of physical and mental abuse, exploitation, coercion, or ill-treatment. This might include, for example:

- Sexual harassment, bullying or abuse.
- Sexual criminal offences and serious sexual criminal offences.
- Threats of, or actual violence, verbal, emotional or social abuse.
- Cultural or identity abuse, such as racial, sexual or gender-based discrimination or hate crime.
- Coercion and exploitation.
- Abuse of power.

'Reasonable grounds to suspect' is a situation where a person has some information that leads them believe that abuse, neglect, or exploitation has taken place, is taking place, or may take place. Questions that may help a person to determine whether they have 'reasonable grounds to suspect' might include:

- Could you explain to another person why you suspect something? This helps to make sure that your suspicion is based on information, even if you have no proof.
- Would an objective other person, with the same information as you, come to the same conclusion? This helps to make sure that your suspicion is as objective as possible.

A **'survivor-centric approach'** means considering and lawfully prioritising the needs, right and wishes of survivors.

The Code doesn't define **'vulnerability'**, but it lists factors that may cause or contribute to vulnerability such as:

- Age
- Disability
- Mental or physical health conditions
- Family violence
- Language barriers
- Literacy barriers
- Cultural background
- Aboriginal or Torres Strait Islander status
- Remote location

- Financial distress

Some of these factors are static and will exist at the time the insurance policy begins, like remote location or a language barrier. Other factors may crystallize after the policy inception or may be progressive and transpire at the time of making a claim, such as if the insured person's and or claimants mental health is deteriorating.

2.2.1 Vulnerable People

While all people must be protected from harm, there are additional legislative and ethical considerations for protecting vulnerable people.

Vulnerable people can include:

- Children and seniors

- People with impaired intellectual or physical functioning

- People from a low socio-economic background

- People who are Aboriginal or Torres Strait Islanders

- People who are not native speakers of the local language

- People with low levels of literacy or education

- People subject to modern slavery, which involves human exploitation and control, such as forced labour, debt bondage, human trafficking, and child labour.

Vulnerable people are not limited to the users of our services. They can include our staff, and third parties, such as partners.

Being able to recognise vulnerability in its various forms is important and the first step to being able to protect vulnerable people.

2.2.2 What do we and our employees do under the code?

There are several things we do when dealing with an insured person and or claimants or business including:

- Recognise that their needs can change over time and in response to particular situations. This may be difficult to identify, particularly if there is limited contact between you and the insured person and or claimants or business after the policy has commenced.

We manage this risk by telling those who are insured and or claimants about the vulnerability provisions and our vulnerability policies and procedures, both verbally and in writing.

We encourage them to disclose their vulnerability. This can be difficult because it requires a level of self-awareness which the individual may not have.

- Take reasonable steps to identify actual or potential vulnerability. We do this by asking specific questions during the disclosure process.

- Provide additional support at all times. Vulnerable insureds and or claimants may require additional support at any point in the life of the policy, even where they have not made a claim.

DXCIS has internal policies and training in place to make sure our employees are aware of and recognise signs of vulnerability and can provide support to vulnerable insured and or claimants as quickly as possible. These assist employees to:

- Understand if an insured person and or claimants or business is vulnerable

- Decide how and to what extent you can support someone who is vulnerable

- Take an insured's and or claimant's particular needs and vulnerability into account

- Engage with the insured and or claimant with sensitivity, dignity, respect, and compassion. This includes having guidelines in place to allow them to arrange additional support or referring them to people or services with specialist training and experience, like a lawyer, consumer representative, interpreter, or friend.

- Work with the insured and or claimant to find a suitable, sensitive, and compassionate way to proceed as early as practicable.

- Protect the right to privacy.

- Escalate a case internally to seek a second opinion on whether an insured and or claimant is vulnerable.

- Reach a decision on whether an insured and or claimant is vulnerable quickly. This includes having timeframes in place and ensuring there are no delays; and

- Have their decision challenged. The internal dispute resolution system enables an insured and or claimant to challenge an employee's decision.

- This is a challenging area as there are many factors that can indicate vulnerability, like a pattern of delayed payments or indications of mental illness. Each business and insured person and or claimant must be handled on a case-by-case basis.

2.2.3 Risks and Consequences

DXCIS acknowledges that Vulnerability is a matter of concern for all Businesses. We are aware of the risks that come with our work and the potential incidents of harm.

Incidents of harm may include:

- Sexual harassment, bullying or abuse

- Serious sexual offences, such as rape

- Threats of violence or actual violence

- Verbal, emotional, or social abuse

- Cultural or identity abuse, such as racial, sexual or gender-based discrimination or hate crimes

- Coercion and exploitation

- Abuse of power.

These incidents of harm can have a wide range of consequences:

- Mental and physical health issues, or even death, for affected people

- Civil or criminal sanctions for the business or individuals

- Anger in the community

- Damage to reputation and negative media attention

- Disruption to services

- Decrease in team cohesion, morale, and productivity

- Inability to attract staff

2.2.3.1 Managing Risks

While everyone involved in our business has a role to play in protecting people, the ultimate responsibility sits with our Responsible Managers and CEO.

It is the Responsible Persons who consider the unique and specific circumstances of our business and ensure it is able to identify and manage the relevant risks.

In order to manage risks, DXCIS has implemented the following seven steps to help protect people from harm:

- Identify and assess the risks and any legal and ethical obligations

- Commit to managing risks of working with vulnerable people

- Prevent harm and mitigate risks with clear and comprehensive policies, procedures, and systems

- Engage people, including those from third parties or service providers, to help manage risks by adhering to policies, procedures, and systems

- Detect changes in risks, instances of harm and of non-compliance with obligations
- Take action when concerns, suspicion or complaints arise
- Assure the Board that risks are being managed

Identify and Assess

There are three important actions in this step:

- Understand our business risks
- Understand our business obligations
- Determine what policies, procedures, and systems our business needs to manage both.

Conduct a Risk Assessment

Identify the risks that come with our business's work with people, prioritise each risk according to its likelihood and consequences, and identify the policies, procedures and systems that will deal with the risks.

When conducting a risk assessment, we will:

- Think broadly about all the people our business affects. What forms of abuse, exploitation or coercion could happen to them, and who might be responsible for them?
- Consider all activities, including those in our business's supply chain or of partners and subcontractors. What could go on just beyond your business's view?
- Think about the likelihood of our business's resources being affected by these risks. How common are incidents like these?
- Consider carefully the consequences of an incident – in particular, the effects on the victim, our business's beneficiaries, its reputation, financial position, partners, and the morale of our staff.
- Seek lots of information to understand the risks. Consult widely, for example through meetings, workshops, and surveys, and identify information sources such as previous incidents, reports, events in other organisations, and media reports.

We acknowledge that vulnerability can be confronting, and people may struggle to talk about it – particularly if they have had a traumatic experience. When consulting people about vulnerability, we will at all times be sensitive to their experiences and approach the topic with care.

It is important that our business knows its legal obligations. DXCIS will keep a register that lists the national, state, and international legislation that affects our business's work.

This register will:

- Identify the jurisdiction and source of the obligation
- Provide a short summary of the obligation
- Record what our business does to ensure that it complies with the obligation
- Review the obligations regularly to make sure the register is up to date

DXCIS will use the register to record and monitor other external obligations, such as government policies or professional standards or codes of practices, that may apply. We will also evaluate whether DXCIS has the right policies, procedures, and systems to manage them.

3 Our Commitment

DXCIS is committed to protecting people from harm. This means:

- Having a clear and accessible policy on vulnerability
- Allocating adequate resources, leadership, and authority to manage the risks
- Making sure that all people in our business share the commitment

DXCIS has formulated a policy that outlines our business's approach to vulnerability. The Policy:

- Has reference to our legal obligations
- Outlines the identified risks
- Defines key terms (for example, 'vulnerability' and 'vulnerable person')
- Clearly states our business's expectations of staff, and partners
- Outlines our business's processes for managing risks
- Identifies who is responsible for managing vulnerability
- Clearly defines the roles and responsibilities of people involved in vulnerability
- Extends obligations to our business's partners and contractors
- Contains supporting resources, such as an incident response plan or an employee vetting document
- Is endorsed by our Board.

4 Our Template Vulnerability Policy

Everyone in our business has access to the policy and it is publicly available.

The leaders of our business – namely the Board and staff – support the vulnerability approach and take it seriously. The Director and Responsible Managers have responsibility for vulnerability and ensure that it features as an agenda item regularly in Board meetings.

4.1 Preventing Incidents of Vulnerability

Policies, procedures, and systems reduce the likelihood and consequences of incidents.

DXCIS has implemented the following procedures and systems:

- Due diligence. The research, background checks and preparation that our business does to minimise the possibility of doing harm to people

- Segregating duties and providing supervision. Policies or procedures that ensure the responsibility for high-risk situations is shared by more than one person

- Managing third parties such as suppliers and partners. Managing third parties includes making sure they are capable of, and committed to, protecting people in their work. Written agreements, contracts or memoranda of understanding are in place for all suppliers to DXCIS.

4.2 Engage

Engaging everybody involved in our business and its work means communicating its expectations, raising awareness of the issue, and building a positive culture of protecting people.

Our business communicates its expectations and raises awareness of the issue through formal channels such as policies, procedures and training resources, and less formal methods such as email updates, newsletters, and staff meetings.

4.3 Detect

DXCIS acknowledges it is important to detect incidents of harm, and also important to detect moments of noncompliance with commitments and indicators that risks might be changing.

To this end DXCIS ensures that:

- Staff and third parties report any concerns they have, including the option to do so confidentially

- There are ways for people to provide feedback, raise grievances and report suspected or actual incidents of harm

- People who report concerns or incidents of harm are protected

- There is guidance for managers and staff on detecting incidents – including what kinds of situations have risks of abuse, neglect, and exploitation

- There is a supportive culture that encourages staff and volunteers to speak up – including a whistleblower policy.

- There is a clear and transparent system for investigating and responding to concerns.

DXCIS therefore has the following actions in place including:

- Training on vulnerability for new staff

- Having clearly defined reporting procedures in its policy

- Providing staff with simple, memorable guidance on the indicators of incidents of harm (known as red flags)

- A communication campaign that shows staff and beneficiaries that it is safe to make reports

- An e-mail address, contact number or other system people can use to make anonymous disclosures.

4.4 Take Action

In the event of a suspected incident, our business is able to take prompt action to understand what might have happened, what risks might exist, and how to protect the people affected.

To effectively respond to a suspected incident, DXCIS has developed a response plan. This helps our business manage the suspected incident and the risks involved. The DXCIS response plan:

- Clearly assigns roles and responsibilities for responding to the incident (with major roles and responsibilities reserved for people with appropriate training, skills and sets out what is required at each stage of the response

- Includes an internal investigation to understand what may have happened

- Provides guidance for when matters should be reported to an external party, for example, the police, ASIC

- Includes a step focussed on development and learning lessons

DXCIS carefully considers the risks before beginning an internal investigation into a matter. We acknowledge that some incidents may be beyond our business's ability to investigate effectively, and it may need to get external help. And some incidents may be so serious that our business will need to refer them to the police.

4.5 Assure

As part of our Vulnerability policy, our Board ensures that there are regular reviews of vulnerability policies, procedures, and systems.

DXCIS reviews them at least annually and after any incident. The review considers the following questions:

- Are they up to date, reflecting the current working environment and legislation or regulation?

- Do they reflect the current risks for our work?

- Do staff and third parties follow the policies, procedures, and systems properly?

- Do the policies and procedures work, or are they ineffective?

- What feedback has our business received about its policies, procedures, and systems?

- What improvements could be made?

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