

Vulnerability and Financial Hardship Policy

Debtwash Pty Ltd

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1. INTRODUCTION

- 1.1 The information in this Vulnerability and Financial Hardship Policy ("**Policy**") applies to Debtwash.
- 1.2 This Policy has been developed to ensure compliance with Debtwash's obligations as outlined in ASIC Information Sheet INFO 254: Debt management services: Applying for a credit licence or variation ("**Info Sheet 254**").
- 1.3 This Policy sets out how Debtwash identifies and supports Clients experiencing vulnerability and Financial Hardship.
- 1.4 Debtwash recognises that a Client's circumstances may change over time due to their individual circumstances and needs and that the vulnerability or Financial Hardship being experienced by a Client may be temporary and not an inherent part of the Client.
- 1.5 The objectives of this Policy include:
 - (a) assisting Debtwash's Employees in identifying and understanding a vulnerable Client;
 - (b) ensuring Debtwash has processes in place to determine how to support vulnerable Clients;
 - (c) ensuring Debtwash takes into account a vulnerable Client's needs; and
 - (d) communicating with Clients to provide support for any vulnerabilities and Financial Hardship experienced.

2. DEFINITIONS

- 2.1 **Client** means an individual Debtwash acts on behalf of in relation to its debt management services.
- 2.2 **Debtwash** means Debtwash Pty Ltd.
- 2.3 **Employee** means a person employed either by Debtwash or by a related entity.
- 2.4 **Family Violence** means violent, threatening or other behaviour by a person that coerces or controls a member of the persons family or causes the family member to be fearful. It also includes emotional, psychological, sexual, financial or economic abuse and damage to property.
- 2.5 **Financial Hardship** means a Client that has difficulties meeting their financial obligations to a credit provider.

3. POLICY

- 3.1 Debtwash comes into contact with vulnerable Clients and Clients experiencing Financial Hardship in the course of carrying on its business as a debt management service provider.

3.2 Debtwash is committed to taking extra care in relation to Clients that experience vulnerability or Financial Hardship. Debtwash recognises that a person experiencing vulnerability or Financial Hardship can give rise to unique needs, which may change over time and in response to particular situations.

4. IDENTIFICATION

4.1 Debtwash encourages Clients to disclose any vulnerabilities or instances of Financial Hardship as soon as practicable to allow Debtwash to arrange appropriate support.

4.2 Debtwash understands that vulnerability may be due to a range of factors including but not limited to:

- (a) age;
- (b) disability;
- (c) mental health concerns;
- (d) physical health conditions;
- (e) Family Violence;
- (f) language barriers;
- (g) literacy barriers;
- (h) cultural background;
- (i) Aboriginal or Torres Strait Islander status;
- (j) remote location; and
- (k) financial distress.

4.3 Debtwash seeks to identify the following circumstances that may amount to Financial Hardship by encouraging Clients to ensure their personal details are up to date and to advise Debtwash of any changes to their details:

- (a) changes made to a Client's employment status;
- (b) changes made to a Client's financial situation;
- (c) Clients experiencing an emergency event or natural disaster;
- (d) medical conditions; or
- (e) relationship breakdowns.

4.4 Debtwash considers the following circumstances may make Debtwash aware a Client is suffering from vulnerability or Financial Hardship:

- (a) direct disclosure by a Client;

- (b) notification by a relative or friend of the Client;
- (c) notification by a supplier or service provider;
- (d) language, behaviour or other circumstances;
- (e) hearing, speech or impairment difficulties;
- (f) loss of employment;
- (g) family breakdown, Family Violence or family death;
- (h) mental or physical illness;
- (i) notifying Debtwash of changes to employment status;
- (j) notifying Debtwash of unplanned bills or expenses;
- (k) notifying Debtwash of difficulties in obtaining basic necessities and resources; or
- (l) providing signs of distress when communicating to Debtwash about their financial difficulties or payments.

5. NOTIFICATION

5.1 When Debtwash identifies a vulnerable Client or a Client experiencing Financial Hardship, Debtwash:

- (a) records all relevant information in relation to the Client's Financial Hardship or vulnerability on the Client file including the following:
 - (i) date the Financial Hardship or vulnerability was disclosed or discovered;
 - (ii) method of communication that the Financial Hardship or vulnerability was disclosed or discovered;
 - (iii) type of Financial Hardship or vulnerability;
 - (iv) details of any support or special circumstances required by the Client in accordance with Appendix 1 and 2; and
 - (v) any recommendations Debtwash has in responding to the vulnerable Client or Client experiencing Financial Hardship.
- (b) advises the Employee that is responsible for the Client;
- (c) records the date, credit provider, type of vulnerability and individual Employee responsible in Vulnerable Clients Register for the information;
- (d) determines the best approach in dealing with the Client.

6. SUPPORTING VULNERABLE CLIENTS

6.1 Debtwash:

- (a) is committed to ensuring services and communications are tailored to meet the individual needs and circumstances of each Client;
- (b) takes appropriate measures to ensure Clients receive timely and appropriate feedback;
- (c) enables Clients to deal with the same Employee each time, where practicable.

6.2 When a Client notifies Debtwash that they require additional support, Debtwash:

- (a) notifies the Employee responsible for the matter;
- (b) protects the Client's private and confidential information;
- (c) works with the Client to find a suitable approach to provide Debtwash's services;
- (d) if additional support is required from a third party provider such as a legal representative, Client representative, interpreter, financial counsellor or community support person, Debtwash recognises this and applies their processes in a manner that is reasonable to support the vulnerable Client;
- (e) if additional information is required from the Client, Debtwash only requests information that is appropriate and allows the Client an extended timeframe, appropriate to their circumstances, to provide this information;
- (f) if a Client notifies Debtwash that they require an interpreter, Debtwash:
 - (i) notifies the Employee responsible for the matter;
 - (ii) provides access to an interpreter where reasonable and in accordance with the Client's instructions; and
 - (iii) records that an interpreter cannot be used if there are reasons that Debtwash cannot provide one.
- (g) if a Client is distressed, Debtwash takes the following action:
 - (i) if the Client is in immediate harm, Debtwash contacts emergency services;
 - (ii) notifies the Director;
 - (iii) provides the Client with information in contacting a counselling service or organisation that offers support; and
 - (iv) recommends that the Client appoints a support person to assist them.

7. CLIENTS EXPERIENCING MENTAL HEALTH ISSUES

- 7.1 Where Debtwash is aware that a Client has a past or current mental health condition Debtwash ensures that Clients experiencing mental health conditions are treated in a fair, reasonable and respectful manner.
- 7.2 Services for Clients experiencing mental health conditions are:
- (a) provided sensitively and Debtwash has regard to their medical treatment needs and adopts methods that are non-intrusive; and
 - (b) provided in the same way as services provided which involve any other medical condition.

8. CLIENTS EXPERIENCING FAMILY VIOLENCE

- 8.1 Debtwash has identified the following circumstances as indicators of Family Violence. Where a Client:
- (a) appears or sounds distressed or fearful;
 - (b) takes instructions from another person;
 - (c) remains silent whilst another person present is communicating;
 - (d) does not understand or is not aware that a credit contract was entered into in their name;
 - (e) asks questions about a joint borrower's behaviour or activities;
 - (f) exhibits concerns regarding the protection of their privacy, safety or security;
 - (g) is hesitant to involve a joint borrower when seeking assistance;
 - (h) changes their address in a frequent manner; or
 - (i) discloses past or present Family Violence.
- 8.2 Where Debtwash identifies instances of Family Violence, Debtwash:
- (a) notifies the Employee responsible for the matter and the Director;
 - (b) ensures safety concerns are met accordingly in order to protect the Client and their family;
 - (c) communicates with the Client in a calm and appropriate way;
 - (d) protects the Client's private and confidential information;
 - (e) provides services in a sensitive manner;
 - (f) provides the Client with referrals to specialist services;
 - (g) ensures the Client is aware of information and assistance available; and

(h) provides support to Employees.

8.3 Debtwash ensures its Employees respond to Family Violence by:

- (a) identifying Clients impacted by Family Violence;
- (b) communicating sensitively with Clients that are experiencing or have experienced Family Violence;
- (c) understanding the effects of Family Violence on a Client;
- (d) recognising early signs of Family Violence;
- (e) carefully handling conversations with the Client without disclosing information to the offender;
- (f) prioritising Clients that experience Family Violence;
- (g) referring the Client to specialist services in providing further guidance;
- (h) understanding the impact that Family Violence has upon Clients;
- (i) protecting Clients by ensuring information is kept private and confidential; and
- (j) understanding the legal implications of family and domestic violence orders and the impact this may have upon the debt or Client's experience.

8.4 Debtwash provides training programs to Employees in relation to Family Violence.

9. TRAINING

9.1 Debtwash is committed to ensuring all Employees who deal with Clients have an understanding of the vulnerability and Financial Hardship which can be experienced by Clients.

9.2 Debtwash's Employees undertake internal training in order for them to:

- (a) understand if a Client is vulnerable or experiencing Financial Hardship;
- (b) decide how best and to what extent Employees can support Clients;
- (c) understand how to record and flag vulnerable Clients or Clients experiencing Financial Hardship;
- (d) understand how to engage vulnerable Clients or Clients experiencing Financial Hardship;
- (e) understand how to protect private, confidential and personal information of Clients;
- (f) understand how to reduce the number of times required for a Client to disclose Family Violence;
- (g) understand how to support Employees affected by Family Violence;
- (h) consider Client needs; and

- (i) engage with Clients in providing additional support, referring to specialist services where necessary and treating them with a sense of respect and sensitivity.

9.3 Training is scheduled and conducted at the discretion of the Director.

9.4 Debtwash arranges relevant training for Employees who are involved in providing services to Clients requiring an interpreter.

9.5 Debtwash maintains a record of all training provided to Debtwash's Employees.

10. POLICY REVIEW

10.1 This Policy is reviewed on at least an annual basis by the Director having regard to the changing circumstances of Debtwash. The Director then reports to the Director on compliance with this Policy.

Issued by Debtwash Pty Ltd

July 2024

APPENDIX 1 – VULNERABLE CLIENT REFERRALS*

Interpreting Services

Referral	Contact Details	Description
Services Australia	https://www.servicesaustralia.gov.au	Services Australia deals with welfare, health, child support payments and other services available to Australian citizens and permanent residents.
Translating and Interpreting Services (TIS)	https://www.tisnational.gov.au	TIS is an interpreting service that provides assistance with individuals that cannot speak English and allows other entities to communicate with these Clients.

Physical and Mental Health Services

Referral	Contact Details	Description
MensLine Australia	1300 789 978	MensLine provides free help, support, referrals and counselling for men with family and relationship concerns.
Beyond Blue	https://www.beyondblue.org.au	Beyond Blue provides information and support to individuals experiencing mental health issues.
Lifeline	https://www.lifeline.org.au 13 11 14	Lifeline provides individuals experiencing emotional distress with access to 24 hour crisis support and suicide prevention.
Relationships Australia	1300 551 800	Relationships Australia provides support services to individuals and families including counselling, family dispute resolution and education support programs.

Family and Domestic Violence Services

Referral	Contact Details	Description
Aboriginal Family and Domestic Violence Hotline	1800 019 123	This hotline provides financial assistance and counselling services to Aboriginal victims of crime.
1800 Respect	1800 737 732	1800 Respect is a hotline for individuals experiencing or is at risk of family and/or domestic violence and sexual assault.
Women's Legal Services	http://www.wlsa.org.au/	Women's Legal Services consists of community legal centres that specialise in women's legal issues including family and/or domestic violence and sexual assault.

Rural/Remote Services

Referral	Contact Details	Description
Centre for Rural and Remote Mental Health	(02) 6363 8444	This Centre provides assistance with rural and remote mental health research and provide evidence-based service, design, delivery and education.
Centre for Rural and Remote Mental Health	(02) 6363 8444	This Centre provides assistance with rural and remote mental health research and provide evidence-based service, design, delivery and education.

**This is not an exhaustive list.*

APPENDIX 2 – FINANCIAL HARDSHIP REFERRALS*

Referral	Contact Details	Description
National Debt Helpline	1800 007 007 https://ndh.org.au	National Debt Helpline provides assistance to individuals experiencing Financial Hardship by providing advisor services.
Centrelink	132 850	Centrelink's provide emergency payments to individuals that are eligible for income support, crisis payment and advance payment.
Money Smart	https://moneysmart.gov.au	Money Smart provides information, guidance and assistance to individuals in controlling their financial circumstances.
United Kildonan Financial Counselling Services	1800 002 992	United Kildonan Financial Counselling Services supports individuals that experience low incomes, financial insecurity and dependence.

**This is not an exhaustive list.*