



Recoveries Corporation Holdings Pty Ltd

Hardship and Vulnerable Customer Policy

VERSION 1.5

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1. OVERVIEW AND PURPOSE

In keeping with our vision of “We enable successful and socially responsible credit experiences by empowering customers through exceptional people, technology and data”, Recoveriescorp recognizes that some of our customers due to their personal circumstances may require extra levels of care.

This policy provides our staff guidelines on how to effectively ensure that our customers are properly assisted in keeping with our vision as well as our obligations to our clients.

Vulnerability can come in a range of guises and can be temporary, sporadic or permanent in nature. A person’s vulnerability may be due to a range of factors such as:

- 🌱 Age-related impairment (Difficulty remembering, understanding or communicating due to age);
- 🌱 Elder abuse;
- 🌱 Illness;
- 🌱 Mental / physical disability;
- 🌱 Mental illness and addiction;
- 🌱 Cognitive impairment;
- 🌱 Family and domestic violence;
- 🌱 CALD Customers – Culturally & Linguistically Diverse Communities
- 🌱 Aboriginal or Torres Strait Islander status;
- 🌱 Remote location;
- 🌱 Financial distress/abuse;
- 🌱 Addiction;
- 🌱 Bereavement;
- 🌱 Threatens harm to self or harm to others;
- 🌱 Impacted by natural disaster;
- 🌱 Any other personal, or financial circumstances causing significant detriment

Recoveriescorp has implemented internal policies, procedures and training in order to enable staff to understand if a customer may be vulnerable, and engage with the customer with sensitivity, dignity, respect and compassion and to take account of their particular needs or vulnerability to better support the customer.

2. SCOPE

This Policy forms part of Recoveries Corporation Holdings Pty Ltd Governance framework and applies to all controlled entities within the group that include (but not limited to) Recoveries Corporation Pty Limited (recoveriescorp), Mason Black Lawyers Pty Ltd (MBL), RCL Services Pte Limited, (RCL Services), and Nutun Finance Australia Pty Ltd (NFA), Prushka Fast Debt Recovery Pty Ltd staff and contractors

3. . WHAT CAN CUSTOMERS EXPECT FROM US

If a customer tells us about their vulnerability, or if we identify, we will work with them to achieve desired objectives for both, the customer experiencing vulnerability and Recoveriescorp. We will:

- 🌱 provide services which are inclusive of all people;
- 🌱 work to find a suitable, sensitive and compassionate way for us to proceed;
- 🌱 recognise and allow in all reasonable ways if the customer needs additional support from someone else;
- 🌱 train our staff to be competent when engaging with customers and others who are experiencing vulnerability;
- 🌱 engage with the customer in a fair, reasonable and ethical manner; and
- 🌱 refer customers to external support, if appropriate.

4. CURRENT SUPPORT AVAILABLE

Recoveriescorp currently has a wide range of support initiatives available to customers, including:

4.1 CUSTOMER IDENTIFICATION

If a customer needs support to meet identification requirements, we will take reasonable measures to support this requirement. This might be the case for:

- 🌱 Aboriginal and Torres Strait Islander customers who live in remote areas
- 🌱 Customers who are affected by a natural disaster such as bushfires
- 🌱 Transgender customers
- 🌱 Customers who have come to Australia as refugees

Our approach with verification and identification will be flexible.

We can use documents as per below:

- 🌱 a driver's licence or permit from Australia or overseas, including a digital driver's licence;
- 🌱 an Australian passport;
- 🌱 a government proof of age card issued in Australia;
- 🌱 a foreign passport issued by a foreign government or the United Nations;
- 🌱 international travel documents issued by a foreign government or the United Nations;
- 🌱 a national identity card issued by a foreign government or the United Nations;
- 🌱 an Australian birth certificate, birth extract or citizenship certificate;
- 🌱 a foreign birth certificate or citizenship certificate;
- 🌱 a government issued concession card, such as a pensioner concession card, a health care card, or a senior's health care card;
- 🌱 a notice from the Australian Taxation Office or other government agency, such as Centrelink, that contains the person's name and residential address, issued in the past 12 months;
- 🌱 a municipal council rates notice or a utilities bill (such as a water, gas or electricity bill) that contains the person's name and residential address, issued in the past three months;

If documents are in a foreign language, we can request for an accredited English translation.

4.2 USING INTERPRETERS

Recoveriescorp will provide access to an interpreter service if requested by the customer or we will offer based on communication difficulties.

Please refer [Interpreter – Section 5](#)

4.3 TELETYPEWRITER (TTY) SERVICE

For customers who are deaf, hard of hearing and/or have a speech impairment, assistance can be obtained through the government initiated National Relay Service (NRS). If required, Recoveriescorp can utilise the Teletypewriter (TTY) to assist the customer. This free service can be accessed by contacting 133 677.

Recoveriescorp staff can contact the TTY service and provide the customer's contact number and a relay officer will contact the customer using the TTY device.

The TTY is a special piece of phone equipment which allows users to type or speak their side of the conversation, with a small display screen where the other person's response can be read. There is also a feature to listen to the caller's response. Three types of TTY calls can be made through the relay service.

Speak and Read

The customer (NRS user) speaks directly to the other person (Recoveriescorp staff member) and reads their responses—typed by a relay officer—on their TTY. The customer can also listen to the Recoveriescorp staff member's response. The volume can be turned up or down.

Type and Read

The customer (NRS user) types their side of the conversation and reads the Recoveriescorp staff member's responses—typed by a relay officer—on their TTY.

Type and Listen

The TTY can also be used by someone who has difficulty speaking on the phone but can hear adequately. The customer types their side of the conversation, with a relay officer reading the words out to the Recoveriescorp staff member. The customer (NRS user) can then listen to the Recoveriescorp staff member's reply directly on their phone.

4.4 MENTAL HEALTH

Recoveriescorp will treat people with any past or current mental health condition fairly and with respect.

In the event we are aware that a customer has a past or current mental health condition, we would work with that customer to determine their needs under this policy.

Training is provided to staff to increase awareness and understanding of common causes, signs and symptoms of mental health conditions in the community.

Staff training aims to develop communication skills for interacting with consumers who have, or show signs of having, a mental health condition







4.5 FINANCIAL DISTRESS

We will work with the customers to help them find a sustainable solution to their payment difficulties with us, inform our client where appropriate and will supply access to additional support services.

Please refer [Hardship - Section 6](#)

4.6 ELDER ABUSE






Elder abuse violates an older person's basic right to feel safe. It is a controlling behaviour or action which frightens or intimidates and can be illegal. No older person should be subjected to any form of abuse, mistreatment or neglect. Elder abuse can take many different forms such as:

-  Physical abuse
-  Psychological/emotional abuse
-  Social abuse
-  Financial abuse
-  Sexual abuse
-  Neglect

Recoveriescorp staff are trained to take reasonable steps to assist customers appropriately. We are committed to ensure that the rights of our Elders are protected. Internal processes are in place to assist with the management of accounts where Elder abuse is identified.

4.7 FAMILY AND DOMESTIC VIOLENCE





Violence is much more than physical. It includes:

-  Emotional & verbal abuse
-  psychological abuse & coercive control,
-  sexual abuse,
-  financial or economic abuse; and
-  damage to property.

Please refer [Helping Customers Affected by Family Violence - Section 7](#)




4.8 JOINT FACILITIES

Customers may enter into loans or other facilities jointly with one or more other borrowers which at times, can have problems arise. This will commonly occur where there is a relationship breakdown or other factors such as family violence and financial abuse. When dealing with issues arising from joint facilities we are expected to follow some general principles when engaging with customers in this situation:

-  Understand that these customers are likely to be experiencing considerable stress
-  Be willing to work with the customers individually
-  Be flexible in our approach
-  Be mindful of any safety concerns

Solutions offered to customer seeking assistance will depend on that customer's individual circumstances.

Options for assistance may include:

-  Reducing or waiving repayment amounts, interest and/or fees for a period of time.
-  Agreeing not to pursue one borrower for the loan.
-  Waiving part or all of the debt

5. INTERPRETER

5.1 OVERVIEW AND PURPOSE

We recognise that some of our customers may experience language barriers in communicating with our office.

In order to facilitate an inclusive customer service, Recoveriescorp is registered with the Translating and Interpreting Service (TIS), an interpreting service provided by the Department of Home Affairs. All Recoveriescorp customers have an opportunity to communicate with us using this service and thereby ensure we are able to assist them effectively.

5.2 FILE NOTES









5.3 COST OF TIS SERVICE





As part of our service to the customer and commitment to assisting vulnerable customers, Recoveriescorp will bear the cost of arranging the interpreter service (TIS).

6. HARDSHIP

Recoveriescorp and our clients are committed to ensuring that genuine consideration is given to persons who are experiencing hardship. Recoveriescorp respects and upholds consumer rights as provided under the Consumer Credit Legislation Amendment (Enhancements) Act 2012 (hereinafter referred to as 'the Act'). Our policy extends to vulnerable customers and also customer requirements under the Banking Code of Practice (BCoP). We understand that sometimes in life people can face unexpected changes in their circumstances or have a misunderstanding of the financial commitment they have made and their capacity to honour this agreement. Our approach is to treat customers with courtesy and respect whilst we find a tailored solution for them.











Hardship is considered when a customer is unable to, because of various reasons, maintain their financial obligations. Reasons could include, but not limited to:

-  Unemployment
-  Under-employment
-  Reduced work
-  Business downturn (self-employed only)
-  Mental / Physical illness or injury
-  Addiction
-  Financial over commitment
-  Incarceration

-  Relationship separation
-  Parental leave
-  Deceased / surviving / bereaved parties
-  Natural disaster / Pandemic






This policy is to ensure that relief is provided for persons experiencing hardship, and that the principles applied in the determination of hardship are consistent throughout the organisation.

6.1 WHAT OUR CUSTOMERS CAN EXPECT FROM US

-  Shorter-term solutions we may be able to help customers with include a payment instalment plan or suspend payments temporarily in the case of some of our clients. We will negotiate fair and reasonable outcome that is mutually acceptable to customers, Recoveriescorp, and our clients.
-  Longer-term solutions we may be able to help customers with providing a range of options that will provide a more sustainable approach. This may include referral to financial counselling services such as National Debt Helpline.
-  Once commitments are agreed, we will establish milestones and actively check to see if the outcomes agreed are still suitable.
-  Customers can nominate to have correspondence redirected at no charge to an authorised representative or an alternative postal address.
-  We will ensure that there are appropriate escalation procedures in place to deal with customer complaints regarding this policy through our internal disputes resolution (IDR) process, our client's internal dispute resolution process, and our external disputes resolution (EDR) process.
-  We will ensure appropriate procedures, and work instructions are in place and maintained to ensure hardship customers are dealt with in a sensitive manner according to the guidelines set out in this policy which is compliant with the Act.
-  Willingness to work with financial counsellors, and or authorised representatives, and to share information subject to privacy and customer consent requirements.
-  Ongoing engagement at an industry level with counsellors and relevant consumer representative organisations to improve our understanding of the complex issues surrounding hardship.
-  We accept Hardship requests via phone, writing or via our portal. We may request for additional documentation.
-  The policy will be publicly available via the Recoveriescorp Customer Options Hub.

6.2 WHAT WE MAY ASK OF OUR CUSTOMERS

To help us assist customer's experiencing hardship in accordance with the Act we ask that the customer:

-  contact us as soon as possible to advise of their updated financial position – communication is crucial;
-  keep us informed of any changes in their circumstances, and contact details;
-  acknowledge the debt and the obligation to repay the debt;
-  consider contacting a counsellor or relevant consumer representative with our support, to discuss their situation and consider the options available;
-  communicate in an open and honest fashion, any information that will assist us to make a decision in relation to the hardship status of the customer;

- supply evidence of hardship if required by the client which may include, but not limited to; statement of position, evidence the customer has consulted with or has an appointment to consult a financial counsellor, statutory declaration from a medical practitioner.

7. HELPING CUSTOMERS AFFECTED BY FAMILY VIOLENCE

7.1 OVERVIEW AND PURPOSE

We recognize that some of our customers due to their personal circumstances may require extra levels of care.

Family and domestic violence is any behaviour that is violent, threatening, controlling or intended to make you or your family feel scared and unsafe.

Internal processes are implemented to help minimise the risk of harm in our interactions with vulnerable customers, and to help ensure timely, consistent and targeted assistance is provided to those affected by family violence.

We encourage customers to tell us about their vulnerability so that we can work with them to arrange support, otherwise, there is a risk that we may not find out about it.

We do not require evidence of an intervention order to trigger the requirements of the family violence policy. Instead, a customer will be treated as per this policy if:

- the customer self-identifies to the staff member as being affected by family violence; or
- the staff member identifies — through the sorts of signs — that the customer may be affected by family violence.

7.2 FINANCIAL DISTRESS AND ASSISTANCE

We will work with the customers to help them find a sustainable solution to their financial difficulties.

Please refer [Hardship - Section 6](#)

8. DEFINITIONS, ACRONYMS, ABBREVIATIONS

Acronyms/Definitions	Full Description
Mental illness	Australia's National Mental Health Policy defines a mental illness as 'a clinically diagnosable disorder that significantly interferes with an individual's cognitive, emotional or social abilities'. Reference: <i>Commonwealth Department of Health and Aged Care (2008), National Mental Health Policy</i>
Financial Hardship	Financial Hardship means a customer has difficulty meeting their financial obligations to us/our clients.

Elder abuse	\\rclsvrv2.rcl.net\RCL Public\RCL Quality System\Legislation & Compliance\Policies and Procedures
Family violence	\\rclsvrv2.rcl.net\RCL Public\RCL Quality System\Legislation & Compliance\Policies and Procedures
TIS	\\rclsvrv2.rcl.net\RCL Public\RCL Quality System\Legislation & Compliance\Policies and Procedures
IDR	\\rclsvrv2.rcl.net\RCL Public\RCL Quality System\Legislation & Compliance\Policies and Procedures
EDR	\\rclsvrv2.rcl.net\RCL Public\RCL Quality System\Legislation & Compliance\Policies and Procedures