

**HESTA**



Super with impact

# Vulnerable Members Policy

September 2024

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impact

# 1. Purpose

HESTA's Vulnerable Members Policy sets our commitments and expectations for dealing with members who are experiencing difficulty and require extra care.

## 1.1 Introduction

When someone is vulnerable, they are more easily able to be harmed, influenced or exposed to loss. This could be because of a range of personal characteristics and circumstances. It may be permanent, long-standing, or temporary. This vulnerability can be made worse by power imbalances between the individual and the institutions or systems they must deal with.

All people can move in and out of vulnerability, particularly if faced with unexpected changes of circumstance or a particularly urgent or complex situation.

HESTA's members, and their related parties, face societal and external factors that place them at risk of vulnerability.

HESTA's approach is to recognise that members may be in a vulnerable state and require additional support.

HESTA's Vulnerable Members policy sets out:

- Our organisational commitment to support those who need extra care
- How we design and deliver services that are inclusive
- How we identify vulnerability and recognise the characteristics and needs of our members
- Our responses to the needs of these members.

## 1.2 Applicability and scope

References to "employees" within this policy should be read to cover HESTA employees, contractors and agents working on behalf of HESTA, including those working via a partner or service provider.

This policy covers our response to members, and also to related parties such as guardians, dependants, beneficiaries, next-of-kin, or kinship relations, who may also need to interact with HESTA. References to "members" within this policy should also be read to cover these other related parties.

## 2. Policy Requirements

### 2.1 HESTA's commitment

HESTA commits to design and deliver fair, flexible and inclusive services that will increase positive outcomes for members, including those in a vulnerable state. We aim to support our members and provide a level of care that is responsive to their needs.

We aim to handle interactions with sensitivity, dignity, respect, and compassion.

We aim to proactively identify members who need additional support, and minimise the reliance on self-identification of members.

We aim to provide access to appropriate information to ensure members are empowered to be confident in the decisions they make.

### 2.2 Service design and delivery

HESTA seeks to proactively understand, anticipate and meet the needs of members, including those in vulnerable situations, so that we can design and deliver inclusive services. We do this by:

- using member experience research and member-led design
- using data to support the development of inclusive services
- seeking and acting upon feedback from members and employees
- engaging effectively with relevant stakeholders and partners, including specialist organisations that represent vulnerable groups.

### 2.3 Training

HESTA employees and agents are provided with training in relation to engaging with vulnerable members, where relevant to their role. This training may include:

- common risk factors and how these can impact members
- recognising signs of vulnerability and the need for additional support
- communication skills necessary to deal with members with respect and compassion
- steps to take if a member appears to be at risk of severe or imminent harm
- steps to take if an employee or agent identifies a suspicious matter
- where to direct members for further specialist support or advice
- the process for complaints or disputes.

### 2.4 Identifying vulnerability

HESTA employees and agents are trained to identify the presence of risk factors which could cause, or contribute to, increased vulnerability. We avoid making assumptions or judgments about a member's circumstance. HESTA may use available data and information to inform its approach to vulnerability, including proactively identifying the presence of risk factors.

Where a member does inform HESTA about a particular situation, we ensure this information is treated with appropriate care and sensitivity.

## **2.5 Responding to vulnerability**

HESTA implements products and services in line with legislation and multiple legal obligations. HESTA aims to act within these obligations, seeking to maintain a balance between flexibility and ensuring our members' interests are protected.

## **2.6 General standards**

These standards are applicable to all members, including those in a vulnerable state.

HESTA employees and agents:

- aim to show members empathy and patience
- ask the member (or their representative) how we can help them access services
- aim to accommodate requests for assistance
- aim to make it easy to appoint a representative
- provide relevant documents on request
- aim to take notes about any additional assistance a member may need.

## **2.7 Alternative identification**

HESTA is required to identify members for a variety of reasons, including security and regulatory requirements.

We recognise that some HESTA members may be in a situation that makes it difficult to provide proof of identify. For example, they may have limited documentation due to family violence, property loss, or name changes. Some groups, such as Aboriginal or Torres Strait Islanders, may also face systemic or cultural issues that make it more difficult to produce identification documents.

HESTA provides opportunities for these members to produce suitable alternative documentation, in line with regulatory guidance.

## **2.8 Family violence**

Where Family Violence is identified or suspected, we aim to protect the safety of the member and their family. We aim to advise members of available support services where available.

In the event that a HESTA employee or agent needs to contact a party related to Family Violence (including the perpetrator) the details of the member and any other affected parties must be protected. For example, we may offer alternative communications or mail delivery methods if applicable to avoid sending information to a perpetrator's address.

## **2.9 Alternative forms of communication**

HESTA provides extra support services to facilitate communication based on individual member needs. Members can choose to access services such as:

- Translation and interpreting services for members from a non-English speaking background.
- The National Relay service for members with a hearing or speech need.
- Written communication by email or post, or verbal communication for members with visual impairment.
- Face to face or video calling options via the HESTA Advice team.

- Easy English versions of some key information documents for members with low level English literacy.

Information on these services is available on our website.

### **2.10 Financial abuse and elder abuse**

Financial abuse and vulnerability are intrinsically linked. Being in a vulnerable situation may increase the risk of financial abuse, and experiences of financial abuse are likely to trigger other vulnerability factors.

HESTA employees and agents are trained in engaging with vulnerable members and identifying instances where members may be exposed to heightened risk of financial abuse and/or elder abuse. We aim to take appropriate steps to protect members' interests consistent with our systems and safeguarding processes within our policies.

### **2.11 Guardianship and third-party authorities**

HESTA recognises that where members are under the care of an appointed guardian, administrator or the holder of an enduring power of attorney, any communications they provide will be sent directly to the guardian, administrator or attorney, and the trustee may only accept payment instructions from them.

In some instances, a member needing extra care may appoint a third-party authority to assist them. This could include a family member, a legal representative, or a financial counsellor. HESTA employees and agents will act on instructions from properly designated authorities.

Guardianship and third-party authorities can sometimes lead to increased risk of financial abuse, including elder abuse. If HESTA employees or agents become aware of any heightened risk or indicators of vulnerability when dealing with a third party, they will aim to take steps to ensure the member's interests are protected consistent with our policies.

### **2.12 Self-harm or suicide**

If a member mentions self-harm or suicide while communicating with HESTA, HESTA agents will treat this seriously and escalate accordingly. We may offer to or proactively contact emergency services or make the member aware of other appropriate support services.

### **2.13 Release of funds**

Members may be able to receive early release of funds in specific circumstances such as severe financial hardship, compassionate grounds, terminal illness or permanent incapacity.

Information on requirements and processes for early release is made clearly available on our website.

HESTA offers assistance to any members who require these services.

### **2.14 Death benefit nominations**

In the event of death, HESTA has a legal responsibility to make sure a member's superannuation goes to their dependents or their legal personal representatives. We encourage members to nominate who should receive their money when they die. We provide information and forms to do this through our website and contact centre.

### **2.15 Gender identity**

HESTA recognises the diversity of our members. HESTA employees avoid making assumptions as to the gender identity of a member, or the member's partner or spouse.

## **2.16 Respect and safety of HESTA employees and agents**

The safety and wellbeing of HESTA's employees and agents, including psychosocial safety, is paramount. HESTA will support its employees and agents when dealing with difficult circumstances.

If an employee or agent is unable to continue an interaction with a member for reasons of their own safety and wellbeing, they will refer the matter to another team member or discontinue the interaction. Members will be provided with opportunities to continue their interaction via other means.

HESTA will support its direct employees through a range of options under HESTA's Wellbeing Program, including Employee Assistance. Employees are encouraged to talk to their people leader or the People & Culture team.

## **2.17 Referrals**

HESTA partners with a number of services that can provide support to members beyond what HESTA can offer directly. For more information, refer to <https://www.hesta.com.au/members/forms-resources/support-services-and-tools>

HESTA employees will offer to share information about these services with members.

## **2.18 Complaint management**

Complaints are to be handled according to our Complaints Policy, which is available online. We recognise your right to lodge a complaint, and commit to not discriminate against anyone for making a complaint.

Members have the right to escalate complaints, either within HESTA or to the Australian Financial Complaints Authority (AFCA).

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