

# ACN Vulnerable Customers Training Bulletin – April 2023



## Introduction

This document outlines Alinta Energy's policies regarding vulnerable customer process.

This document may change from time to time - when it does, Alinta Energy will provide notice to its partners.

## Vulnerable Persons

A vulnerable customer is defined as a person who may find it difficult to make an informed decision or support a cause as they cannot understand, retain, or communicate their decisions adequately.

The potential consumer may believe the IBO has their best interests in mind based on the IBO's advice. However, it can create a problematic situation where the customer finds it difficult to provide explicit clear and informed consent.

## Characteristics of a vulnerable persons

What are the characteristics of a potentially vulnerable customer? The below bullet points outline a range of characteristics of disadvantages or vulnerabilities that may be experienced by consumers/customers. These include, but are not limited to:

- low income;
- non-English speaking background;
- disability, including intellectual, psychiatric, physical or sensory;
- serious or chronic illness;
- poor reading, writing and numerical skills;
- elderly;
- family or domestic violence;
- experiencing a natural disaster or crisis event;
- recent bereavement;
- remoteness; and
- caring for someone experiencing any of these circumstances.

Of course, not all consumers/customers with these characteristics are incapable of decision making.

## Warning signs

The below bullet points outline a range of warning signs of a potentially vulnerable person. Some of the warning signs may be:

- overly trusting;
- language barrier;
- appearing confused;
- repeating themselves;
- a long delay in answering and asking questions;
- the emotional state of the person appears flustered or agitated;
- asking the sales agent to speak up and or slower, repeatedly;
- saying "yes", even though they don't appear to have understood or heard; and
- lack of independence, for example, "my children/partner/carer deals with these things for me".

## Helpful Hints

The below bullet points outline some helpful hints for an IBO when interacting with a potentially vulnerable customer.

- set expectations;
- keep the conversation on topic;
- show understanding and empathy;
- speak clearly and at a reasonable pace;
- actively listening to what customer is saying;
- avoid assuming you know their needs or abilities;
- ask if there is a better time to call/schedule a visit;
- patience, allowing the customer to respond without interruption;
- ask if there is anyone they normally speak to before making any decisions;
- clarify their understanding “let me know if you want me to explain anything again?”; and
- offer alternatives, advise the customer of other options to sign up. Especially where the customer expresses they wish to speak with a carer, family or a friend.

## How to treat a vulnerable person

As an ACN IBO, you have an obligation to treat consumers fairly.

- Taking particular care when dealing with consumers that may be vulnerable
- Extra vigilance and alertness to observe for any signs of vulnerability.
- Ensure your actions, whether intentional or not, do not mislead or take advantage of the consumer.
- If the customer seems uncomfortable, confused, agitated, in a highly emotional state or does not speak English adequately, IBOs must politely end the conversation and leave immediately/hang up.
- When in doubt about whether a consumer would be classified as ‘vulnerable’, give them the opportunity to seek advice. Such as a carer, guardian or other appropriate person to be present to assist the customer with the decision. If not available, then play it safe and politely end the conversation.

Any customer residing in an **aged care facility** or a **nursing home** should be considered a **vulnerable customer**.

## Important

Alinta Energy has an obligation to ensure that no vulnerable customer is disadvantaged on price. To meet that obligation, Alinta Energy will need to ensure that a bill comparison is conducted on each call. At completion of the bill comparison, should a prospective customer be financially worse off under Alinta Energy’s offer, Alinta Energy will not be able to complete the sale.

Where a vulnerable customer is identified, the following process must be followed:

1. The above steps on “How to treat a vulnerable person” should be followed
2. If the customer wishes to continue, and has had the opportunity to consult with their carer/guardian/other appropriate person, then
3. The customer should call the dedicated ACN Sales Hotline on 1800 314 672
4. A bill comparison will be carried out by the Alinta Energy agent
5. Once the Alinta Energy agent has confirmed the customer will not be financially worse off under Alinta Energy’s offer, the sale can be completed over the phone.

**Reminder:** Any customer residing in an aged care facility or a nursing home should be treated as a vulnerable customer.