

This policy is available on Insight's raffle websites and is used in staff induction and training.

If you have ideas for this policy, please email us at compliance@insightcfs.com.au

Vulnerable Purchaser Policy and Procedure

Policy

1. Insight recognises that some contacted people may be unable to make considered, binding or satisfactory purchase decisions.
2. We are selling raffle tickets, but Agents must not force sales on contacted persons. Each contact must be successful on both sides. This is Insight Policy and it is the law.
3. The aim of our calls is to make money for the client to use for its charitable purposes.
4. A sale made to a person, in the broad groups below or otherwise, who is potentially vulnerable to agreeing to the request to support for the wrong reasons is not invalid because of the nature of the sale.
5. It is Insight's responsibility to determine if the buyer is vulnerable because of each person's apparent condition so as to ensure the customer who buys is happy with the purchase.

Procedure

Testing for Vulnerable Purchasers

The test of a satisfactory sale is that the person contacted understands the purchase and in the absence of signs of confusion, is content to make the purchase.

If the conversation becomes irregular, be aware of the following behaviours which may indicate that you may need to avoid the sale or prevent misunderstanding. Advice on how to avoid a problematic sale is provided immediately below.

- Confused about the purpose of the call and who is on the line.
- Wanders off topic.
- Gives inappropriate responses.
- Provides irrational/confused responses.
- Requests for repetition of parts of the calls.
- Sounds childish or youthful.
- Slurred speech, poor concentration.
- Losing track of simple parts of the conversation.
- Poor expression with easy concepts.
- Unrealistic expectations of the outcome of the purchase.

How to manage a Sale to a Potentially Vulnerable Person

Seek help from an experienced sales agent or supervisor.

1. Ensure that there is rapport and engagement with the contact about the client, its work and the raffle or other means to support.
2. Ensure that concepts are understood by speaking clearly as you would to anyone else. Speaking loudly might be appropriate for someone who identifies as hard of hearing but unnecessary loudness such as shouting is never a substitute for communication challenges such as English being a second language or slow responses.
3. Don't assume silence is an agreement.
4. Use the sale confirmation at the end of the call to confirm details and understanding.
5. Test the customer's understanding of the purchase by asking an open question (seeking an opinion) about a prize or the client. Expect a clear response.
6. Ask if the customer is okay. Have I caught you at a bad time?
7. Give the contact a door out. Would you like to discuss this purchase with someone? Is there a better time to discuss this purchase?
8. Test basic issues about the person without being intrusive:
 - Can I ask your age please? We need to do that.
 - Is this the best time to discuss this?
 - You sound busy, perhaps I should call back?
 - Is there someone there who can help you with the payment method or the phone.
 - I am having trouble hearing you, can I get a supervisor to help me?

When speaking to a person with the following characteristics take extra care. These personal characteristics by themselves are not evidence of vulnerability for making a normal lottery entry purchase. If they come up in conversation take special care:

- Living in a nursing home.
- Intoxication.
- Disability – A disability even if apparent on the phone is not a basis for refusing or refunding a purchase.
- English as a second language.
- Suggests they do not manage their finances.

All patience must be provided to any apparently vulnerable phone contact. If clear instructions to buy are not provided by the contacted person or if the questions involved in a purchase are not answered then the sale should be avoided.

Please note:

- Do not lie to a person so as to avoid a sale to a potentially vulnerable person. Seek assistance from the supervisor.
- Do not discriminate on any basis by denying someone a purchase because of an actual or perceived personal characteristic.

Screening Unsuitable Purchasers and other action

1. To assist people who may be vulnerable, to avoid wasted effort or potential embarrassment Insight attempts to screen sales to people who may appear to be vulnerable before the sale occurs or allow the purchaser an opportunity to review or cancel the purchase. The means of doing so are set out above.
2. Insight will refund purchases made to vulnerable people where those purchases are identified and communicated to us promptly or with an explanation.

3. Insight will remove vulnerable persons from our calling databases where Insight considers that this policy applies or there is a request.
4. If after applying the methods described here and the contact person insists on the purchase continue with the purchase and request Insight's Customer Service team make a Verification Call.

This policy is to be reviewed on 20 February 2022