

## **Vision Super Transition Plan**

(Insurance in Super Voluntary Code of Practice)

We have adopted the Insurance in Superannuation Voluntary Code of Practice, which commenced on 1 July 2018. Full details of the Code can be accessed <u>here</u>.

## This transition plan applies to the following funds:

1 July 2019

Local Authorities Superannuation Fund (LASF).

Transition date

## The products that we offer that will be covered by the Code are:

- Death cover, which is payable on the death of an insured member, or in the event of terminal illness with a life expectancy less than 12 months
- Total and permanent disability (TPD) cover, which is payable in the event an insured member becomes disabled to the extent they will be unable or unlikely to ever work again or look after themselves ever again
- Income Protection (IP) cover, which is payable as a specified amount of replacement income for a specified period for insured members who are unable to work due to illness or injury.

This transition plan describes the dates that Vision Super will comply with the standards of the Code. How each section of the code will be addressed is specified. Where a section of the code is not mentioned in this transition plan, it is because Vision Super already complies with that section of the code.

Code section	Included items	Status
(14.1) Promoting, monitoring and reporting on the Code	Promote the Code and make it accessible, which will include providing information about the Code on our website, in our insurance communications and in relevant marketing documents	Completed
(6.11) Release of funds	Allow our members to receive early release of some of the money in their account on the basis of severe financial hardship or compassionate grounds, we will clearly explain the process on our website. If we do not allow this, we will explain the reasons	Completed
(4.48 - 4.22) Cancelling your insurance cover	Communications will be updated ensuring that the following is clear to members:	Completed
	• When and how cover can be cancelled, or reduced	
	• The consequences of cancelling or reducing cover	
	• The date cover ceased	
	<ul> <li>How members can apply to have their cover reinstated, or it has automatically ceased.</li> </ul>	
	Accepted methods of cancellation will be extended to cancellation by telephone provided sufficient identification standards are met.	
(13.14 - 13.15) How to make a complaint	The Funds complaints procedures will be updated to ensure it is clear when members can expect progress updates and when a final response will not be available within 45 calendar days.	Completed

(5.5,5.9 & 5.10) How we will provide you with information	Key fact sheets will be made available for our automatic insurance cover on our website, which will be available in hard copy if requested. The Funds welcome pack will be updated to include additional information to help members understand their insurance cover, being:	Completed
	• A copy of the Key Facts Sheet	
	<ul> <li>A statement that members should consider whether they hold insurance elsewhere, in another fund or outside superannuation, and the impacts of holding multiple insurance policies</li> </ul>	
	A link to the Code	
(4.31) Duplicate insurance cover	Ask new members for their consent to use the SuperMatch service to determine whether they have any other insurance cover in a superannuation fund. This is to ensure that they do not have duplicate cover which they may not be able to claim on but are still paying premiums for.	Completed
(7.6) Handling Claims - Principles for claims handling	Publish our claims philosophy on our website, which will have been arrived at in collaboration with our insurer	Completed

Transition date	1 January 2020		
Code section	Included items	Status	
(11.1 - 11.2) Refunds	The Funds refund process will be updated as below:	Completed	
	<ul> <li>On submission of a claim if it is identified that the member is ineligible for payment due to another similar claim on a different policy, the member will be given the option of a refund of premiums.</li> </ul>		
	• If it is identified that a member was never eligible to claim against their automatic insurance cover from the start of the cover, we will refund their premiums for the period they were ineligible.		
(5.14 - 5.16) Helping members to make informed decisions - Explaining our definitions	Definitions of total and permanent disability will have been updated to align with the standard headings specified in the Code, and any differences in standard definitions will be described in simple and understandable terms for members.	Completed	
(7.15, 7.17 - 7.21) Handling Claims - Making a claim	A fact sheet will be made available on our website and in hard copy if requested, for members or beneficiaries intending to claim either Death, TPD or IP. This fact sheet will contain the details on terms of cover, the claims process, how we keep members informed through out the processes and other critical claim information.	Completed	
(6.1 - 6.3) Supporting vulnerable consumers	Staff training will be provided, to ensure our staff are confident in identifying and supporting vulnerable members.	Completed	
	Additional services will be made available to members identified as being particularly vulnerable and requiring the assistance of individuals or services with specialist training and experience to provide adequate support.		
	Permission will be sought to keep a record of the support or assistance required by members.		

(6.7 - 6.9) Interpreting services	Provide access to an interpreter when requested by a member, or when identified that effective communication will not be achieved without the use of an interpreter.	Completed	
	Our website will contain a link website to information on interpreting services and any other information relevant to members that do not speak English, or speak English as a second language.		
Transition date	30 June 2021		
Code section	Included items	Status	
(4.24 - 4.27) Appropriate and Affordable Cover - Communicating to you about your lack of contributions	Members identified as no longer in receipt of eligible contributions for a period of six months will be contacted in writing.	#Partially Completed	
	Automatic Insurance Members that have not been in receipt of eligible contributions for a period of 13 months will receive information about their income protection ceasing.		
	Members that are likely to have an account balance of less than \$6,000 13 months from the date of their last eligible contribution, will automatically cease their death and total and permanent disability cover, unless they advise us they wish to keep this cover.		
	# Recent changes to superannuation laws impose alternative notification requirements on superannuation funds, these laws prevail over the Code requirements and we comply with the alternative notification requirements.		
(4.1 - 4.17) Appropriate and Affordable Cover - Benefit Design	The Fund will have defined and identified 'younger members', 'members nearing retirement' and 'low or infrequent contributions' based on our knowledge of our membership, and new processes implemented communicating to our members about lack of contributions.	Partially Completed	
	The Fund will have conducted member and market research to provide valuable insights into a new and appropriate benefit design for our members, at all life stages.		
	Negotiations with our insurer will have taken place so that premiums can be kept below 1% of an estimated salary for our member base, unless by doing so the result would be an inadequate level of cover for their life stage.		
(6.12) Release of funds	All payment forms will be updated to explain to members the impact on any insurance cover they may have and their option to leave enough funds in their account to pay for insurance premiums.	To be actioned	
(12) Staff and Service Providers	Staff and services providers will have received adequate training to understand and apply the requirements of the Code.	To be actioned	
(4.1 - 4.17) Appropriate and Affordable Cover - Benefit Design	The strategy used in designing insurance benefits will be published on the Vision Super website.	Partially Completed	
	A new benefit design and premium structure will be implemented from this date, having held premiums at the same level for most of our membership at the same level for the previous three years.		

(14.2 - 14.4) Promoting, monitoring and reporting on the Code - Vision Super's Role With all aspects of the Code having been implemented by this date, **To be** by 1 January 2021 systems will have been established to ensure the **actioned** Code is complied with.

Monitoring and analysis will occur on:

- Member policy data we hold
- Our communications to members
- Claims data
- Internal and external complains

We will publish on our website an annual Code compliance report, which will include:

- Occasions where we have failed to comply with the Code
- Instances where we have determined that complying with the Code is not in the best interests of our members
- Any steps we are taking to improve our Code compliance

Through ongoing monitoring, if we identify an instance where we have failed to comply with the Code and this has resulted in on or more of our members being directly disadvantaged, we will have measures in place to rectify this.

To improve member education on insurance in superannuation, in our next annual report, and as an ongoing enhancement to future annual reports, we will explain the steps we have taken to improve member education.