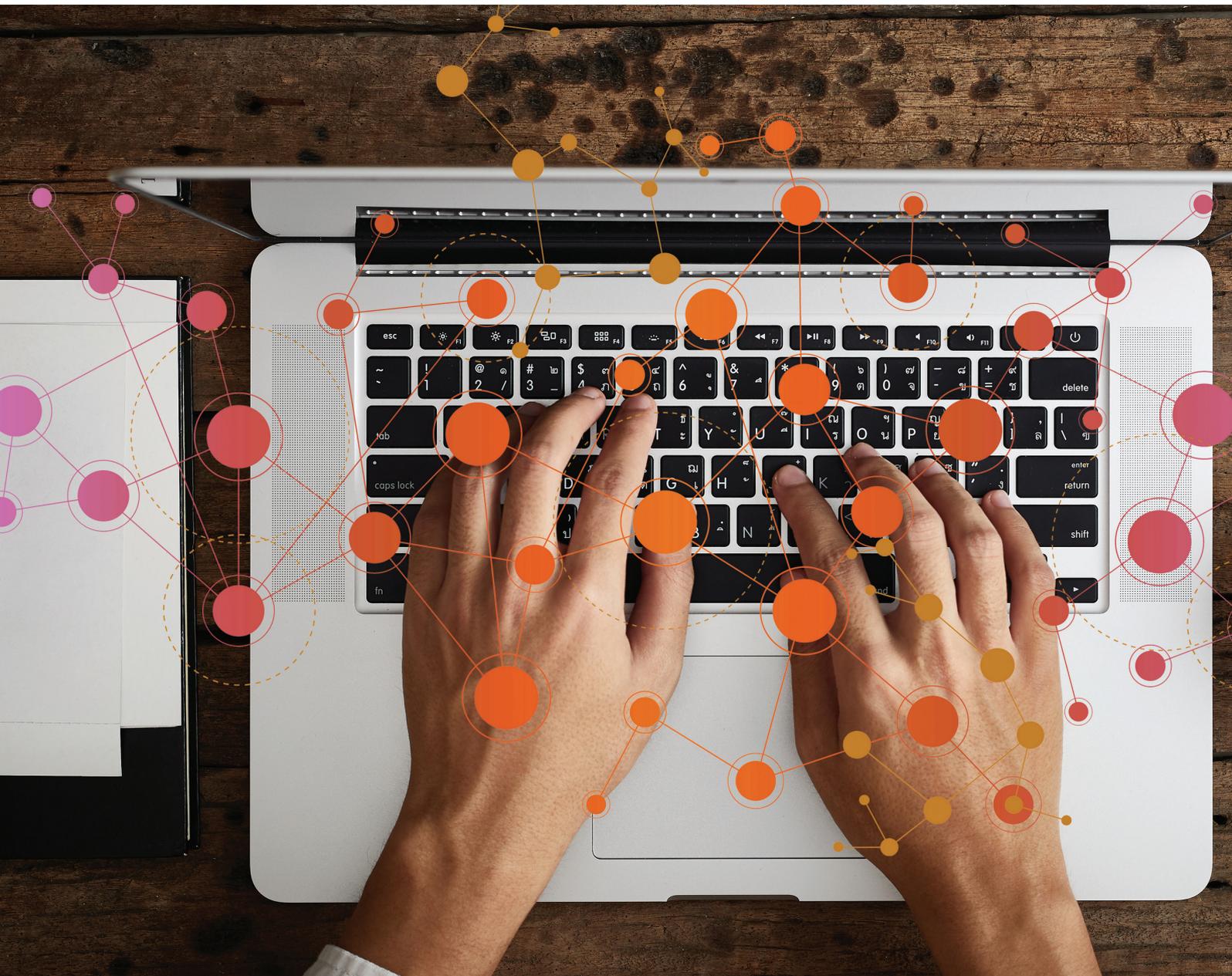




Coronavirus (COVID-19)

Preparedness for the
financial counselling sector



MARCH 2020

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1

Background

There has been an outbreak of coronavirus (COVID-19) globally and the World Health Organisation has proclaimed it a pandemic. The Australian Government is continuing to introduce measures to slow the spread of COVID-19. This will have an impact on all Australians including the financial counselling sector.

Financial counsellors and financial counselling agencies will need to make decisions about how to respond to COVID-19, to manage the risks for both financial counsellors and their clients.

At the same time however, many people in the community are going to experience various degrees of financial hardship and will need access to financial counselling. Working on options to maintain access to financial counselling assistance for the public will be important.

This document covers a number of options to consider and steps to take to minimise risk and continue access to financial counselling assistance. As the measures to prevent the spread of COVID-19 from the Government continue to evolve however, it is essential that you check the latest guidance at health.gov.au or your State or Territory based Government health website.

We have also turned relevant parts of this document into a checklist to help in planning – see Attachment 1.

This information is guidance only. It does not cover every possible scenario or issue. Financial counselling agencies may want to develop and tailor more specific policies and procedures for their agency. Each financial counselling agency, as well as individual financial counsellors, will have different circumstances and needs.

2

Considering a range of options for service delivery

Financial counselling agencies have a range of options for service delivery:

- a. Face to face (with extra precautions)
- b. Phone, email and web/video chat from the office
- c. Working from home using phone, email and/or web/video chat.

Being flexible with service delivery is an important way to maintain access for clients to assistance while remaining safe.

3

Face to FACE (with extra precautions)

Financial counselling agencies should consider the following actions to keep staff safe.

3.1 Developing a workplace policy for COVID-19

Agencies should have a plan to manage the risks associated with COVID-19, which takes into account ongoing Government health advice, and should cover:

- How to manage the situation if a worker becomes ill at work, such as:
 - › putting the person who is ill in a room or area where they are isolated from others in the workplace
 - › limiting the number of people who have contact with the person who is ill
 - › giving the person who is ill a disposable surgical-style face mask to wear to reduce the risk of disease transmission, if possible, advising them to go home (preferably not using public transport) and immediately call their doctor
 - › recording those who become ill and leave the workplace and the people they have had close or casual contact with
- How to manage someone who has been in close contact with a suspected and/or confirmed case of COVID-19:
 - › Important: close contact is defined as close personal contact within 1.5 metres of each other for a period greater than 15 minutes or having been in the same closed space for at least 2 hours, with someone who has tested positive for the COVID-19 when that person was infectious
 - › advising people in these situations to self-isolate at home for 14 days and, if symptoms develop, seek immediate medical advice
- How to manage a suspected case of COVID-19 awaiting results, such as:
 - › advising the person to remain self-isolated at home and strictly follow their doctor's advice
- How to manage a situation where a person has COVID-19 and the transmission was work-related.
 - › How to identify people who may be at risk, and support them, without inviting stigma and discrimination into your workplace. This could include people who have recently travelled to an area reporting cases, or other people who have conditions that put them at higher risk of serious illness (e.g. diabetes, heart and lung disease, older age)
- What to do when a person with suspected infection has left the workplace, including ensure the person's workstation, work area and any communal areas they have been thoroughly cleaned and disinfected

3.2 Education – stopping the spread

All financial counsellors and other staff should be provided with public health information on steps to stop the spread of COVID-19. Public health information can be found at www.health.gov.au.

There are a range of posters already available at www.health.gov.au that should be placed around the office for the benefit of both financial counsellors and clients. The posters are:

- Simple steps to stop the spread
- Recently travelled overseas
- Good hygiene is in your hands

The public health messaging should also be reinforced by:

- having tissue boxes available,
- put sanitising hand rub dispensers in prominent places around the workplace and make sure they are regularly refilled
- make sure that staff and contractors have access to facilities where they can wash their hands with soap and water
- Avoiding contact and keeping a 1.5m distance.
- Disinfecting surfaces regularly
- Ensuring infection control procedures are reviewed in consultation with cleaning staff and they have access to suitable personal protective equipment (PPE)

3.3 Financial counsellors who may be at extra risk

Some people are at extra risk or more vulnerable to serious infection if they are (from health.gov.au):

- people with compromised immune systems (e.g. cancer)
- elderly people
- Aboriginal and Torres Strait Islander people, as they have higher rates of chronic illness
- people with diagnosed chronic medical conditions
- people in group residential settings

Financial counsellors in the above categories may need to avoid all face to face contact with clients and other staff.

3.4 Making appointments

Minimising risk may include asking potential clients questions when making appointments. Potential questions could include:

- Have you recently returned from overseas?
- Are you feeling unwell?
- Are you concerned about coming in for a face to face appointment?

If there was a risk identified, the financial counselling agency could offer to provide advice over the phone, through email or web or video chat.

3.5 Face to face appointments

Face to face appointments would proceed as normal with financial counsellors to consider minimising risk by washing their hands, avoiding direct contact with the client and keeping a reasonable distance.

3.6 Other options for service delivery

An option to consider is continuing to keep the office open for staff but not seeing clients face to face. Clients would then be given the option for phone or video appointments. Clients could also send enquiries via email. The financial counselling agency may already have policies in place to cover these types of service delivery. See Attachment 3 – Email Advice and Casework Policy.

4

What is needed to operate from home

We need to plan for the style of our services to change. Financial counselling agencies will need to consider the following if staff are working from home.

4.1 Policy

Ideally an agency would have a “working from home” policy that could apply to all staff (not just financial counsellors). Attachment 2 is a very simple template. Agencies should get their own advice about this.

4.2 Equipment

Financial counsellors will need a laptop, screen and phone access (ideally with the option to use three-way calls) to work from home. The laptop should be owned by the agency.

4.3 Internet

Financial counsellors will also need adequate access to the internet.

4.4 Database

Financial counsellors will need to be able to access the agency’s database, so that they can keep electronic records and still do conflict checking.

4.5 Confidentiality

Client confidentiality needs to be maintained as if the financial counsellor was in their normal office. This means that the financial counsellors would need a place in their homes where telephone or video conversations would not be overheard. Similarly, laptops should be password protected so that others in the home cannot access personal information.

If the financial counsellor takes any handwritten file notes or prints documents at home, depending on their nature, these may need to be stored in a locked filing cabinet. (They would eventually be returned to the office when normal business continues, or alternatively, the agency policy might be that all records are electronic.)

Because confidentiality is so important, it would be useful for agency managers to discuss this with every single financial counsellor.

Confidentiality needs to be included in the agency policy also.

4.6 Communication

For financial counselling services to continue to operate they will need to move to a telephone and video conferencing service delivery (such as Skype, Zoom and so on). Not all clients will be able to access these methods, but a large proportion should be able to do so.

4.7 Financial Counsellor Authorisation

A financial counsellor needs consent from the client for the following:

1. To act as their representative; and
2. Authority to access personal information from the creditor

The usual process is to get an authority signed. The authority identifies the financial counsellor and gives clear written consent. Verbal consent is also an option. The financial counsellor may get verbal consent initially, on the understanding that written consent will be obtained later.

There are a range of options available to get authorisation and these are set out below.

Getting a signed authority (usual practice)

- Send the authority by email and the client prints the form and signs. Printing the form may be through a friend, family or a community centre. The client can then take a photo or scan the authority and return it.
- The client can also sign the authority electronically (using a pre scanned signature or a document that can be signed electronically) and return it.
- Send the authority by post (consider including a stamped self-addressed envelope for return)

These options should be discussed with your client to work out the best option.

If there is an urgent need to talk to the creditor, it is suggested that a three-way call (the financial counsellor, the client and the creditor) may be needed so your client can directly authorise you to speak on their behalf for an urgent matter.

Verbal authority (for situations where usual practice cannot be followed)

The Privacy Act does allow for verbal authority to access personal information. Creditors often ask for written authority, so it is important to be aware that obtaining verbal authority may lead to delays and disputes with creditors over this issue. FCA will contact creditor peak bodies in the banks, telco, debt collection industry and so on to let them know that financial counsellors, during the coronavirus emergency, may need to accept verbal authorities. Financial counsellors will need to explain this in correspondence with creditors.

There are a number of options to obtain verbal authority:

- The client can call the creditor and authorise the financial counsellor to access their personal information and identify the financial counsellor and their registration number. The creditor can then make a note and act on that authority.

- The financial counsellor can explain the authority form by phone/video to the client, check that the client understands what it means and record in the file that the client has consented. Then tell the creditor that the client has consented verbally.

It is vital to keep a record. A template file note is in the box below.

I explained to (name of person in the creditor organisation) that our agency would be able to contact the following creditors on their behalf (list of creditors) but we would need their permission to do this. I explained to (name of person) that this permission would allow our agency to:

- ask for and exchange personal information with their creditors, such as their name, address, date of birth as well as information about their accounts
- negotiate an outcome for them; and
- enter into arrangements for them.

(Name of person) provided verbal permission for our agency to do this.

4.8 If the Financial Counsellor is Unwell

The normal sick leave arrangements will apply regardless of the reason a financial counsellor is unwell. The financial counsellor will need to:

- Notify their supervisor that they are unwell
- If COVID-19 has been confirmed, the supervisor must also be informed
- Sick leave should be taken if needed.

5

How to deliver services remotely

If most of the way the agency has worked to date has been through face to face interactions, it will be different to move to telephone/video service delivery.

There may also be challenges in receiving copies of documents via mail - these could potentially be photographed and emailed.

5.1 Existing Clients

The challenge in assisting existing clients will be retaining access to any hard copy records.

If agency records are electronic, then the process will be easier.

Agencies that have hard copy records, could start scanning these now to prepare for the potential that services will be provided remotely.

5.2 New Clients

- Agencies will need to consider how new clients will be able to reach you.
- Agencies may also need to notify the National Debt Helpline in their State about how they are working and if referrals arrangements will change.
- In accordance with the usual practice of the agency, clients should be given information about privacy. If the client was usually given a privacy statement, this practice would need to change to include reading out the statement or emailing the statement to the client.

6

How to support staff

6.1 Staying in Touch

There are also going to be challenges in supporting staff if large numbers of people are working from home.

Agency managers may need to arrange regular team meetings (phone/video) and individual check-ins.

Professional supervision and access to EAP should be able to continue to be provided as normal.

In a work office environment, we can turn to the people around us to debrief or to seek advice. This will be different for financial counsellors working from home. It would be worth thinking about who they could quickly call if they have a casework or other question.

6.2 Training and Resources

Working with new clients only over the phone or by video from the outset will be a different experience. It is better that people get some service though, rather than no service and we may be surprised by how much can be achieved.

FCA and State/Territory associations will be offering training in telephone skills and other topics if necessary, and developing resources if needed.

Attachment 1

Preparedness checklist for financial counselling agencies re COVID-19

TOPIC	Yes	No	Comments
Working from Home			
Does my agency have a “Working from Home” (WFH) policy?			
Has the agency adapted its existing policies to adequately cover what will be needed for a financial counsellor to do their job from home? Examples: <ul style="list-style-type: none"> ■ ensuring confidentiality ■ explaining the privacy statement to clients by phone/video ■ obtaining client authorities ■ email correspondence 			
What is needed to operate from home for each person?			
Equipment needed – laptop (password protected), screen, desk, chair			
Telephone and/or video capacity, internet			
Access to work database			
A space where calls can be taken without others overhearing			
Locked filing cabinet (depending on way of working)			
Communication and support			
Is there a process in place so that the team leader will stay in touch with staff?			
Details of who the financial counsellor can ring for support for client casework and advice			

Attachment 2

Working from home policy template

Agencies should obtain their own advice. This draft below is for general guidance only and is deliberately a very short and simple draft.

Purpose

This policy sets out (name of agency's) policy on financial counselling staff working from home.

Process

Approval

Financial counselling staff wishing to work from home must seek approval from their manager. The manager and staff member will need to agree on:

- The days of the week that the staff member will work from home
- How long the arrangement will last

In extraordinary circumstances, such as the coronavirus crisis of 2020, staff may be required to work from home. This arrangement will only occur however if the staff member's home environment is conducive to working from home, for example, there is space to work.

Staff Member's Home Environment

The financial counselling staff member will not be able to work from home unless there is a space in the home – a "remote office" where they can conduct financial counselling in a confidential way.

The financial counselling staff member may also find it difficult to work from home if they may have caring responsibilities, such as for young children because they are also at home.

To confirm that the working environment is adequate, we will ask staff members to provide some evidence. This could be by sharing photographs of the space or by a visual inspection conducted via Facetime or a video service.

The remote office needs to have a desk and chair.

What we will provide

Our agency will provide the following equipment:

- Laptop (password accessed)
- Screen
- Mobile telephone
- Assistance in relation to accessing the internet (if necessary)

Workplace Health and Safety

We are responsible for your health, safety and welfare when you are working remotely.

- For regular and ongoing working from home requests, we will arrange for a WHS assessment.
- For ad hoc and emergency responses, a WHS self-assessment can take place. This should consider:
 - > Lighting
 - > Tripping or falling hazards
 - > Electrical safety
 - > Noise
 - > Security
 - > Fire exits

Employees also have a legal responsibility to take reasonable care for their own health and safety when working from home. As such, employees must have access to appropriate first aid items, fire alarms and where appropriate fire suppression equipment. Staff should also inspect their premises regularly for hazards.

If you are injured or there is an accident while working from home, please contact your manager.

Attachment 3

Email advice and casework policy

Agencies should obtain their own advice. This draft below is for general guidance only.
This policy could be incorporated into any existing policy on the use of email by staff.

Purpose

This policy sets out (name of agency) policy on financial counselling staff using email to provide advice or casework assistance to clients.

Scope

This policy covers the use of email for advice and casework.

Confidentiality

The financial counselling agency must maintain client confidentiality.

Email disclaimer

A disclaimer should be included on all emails that covers:

- That the email and any attached files are confidential
- If the email is received in error asking the recipient not to read it and delete it immediately

What you are agreeing to do

The first email to the client should cover the basis on which (name of agency) is providing assistance. If the agency has a standard engagement letter this should be included. It should cover:

- What you are agreeing to do
- What the client needs to do
- What you are not agreeing to do
- That the advice should not be given to third parties
- That your advice is based on the client's instructions. If those instructions change your advice may change
- A warning that email may be insecure and they accept those risks
- Any required statements on privacy