Coalition Action Framework

September 2025

What is customer vulnerability?

"A state in which consumers are subject to harm because their access to and control over resources are restricted in ways that significantly inhibit their ability to function in the marketplace.

Hill and Sharma (2020, p 551) – Defining 'consumer vulnerability'

"A vulnerable consumer is someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when an organisation is not acting with appropriate levels of care.

Both definitions highlight the responsibility an organisation has to respond appropriately in order to reduce further harm.

Thriving Communities is a coalition of organisations working together to achieve better outcomes for people experiencing, or at risk of experiencing, economic harm

People who are experiencing, or at risk of experiencing economic harm, could be:

- subject to the intentional acts of person or perpetrator, in the case of economic or financial abuse,

or

- subject to the unintentional acts of harm by institutions they interact with due to systems and processes that do not adequately support them when they need it

Better outcomes for customers experiencing, or at risk of experiencing, Economic Harm

Economic Harm is the consequence of behaviours which control, restrict or exploit a person's access to economic resources.

This includes access to essential services as well as employment, education, housing and transport.

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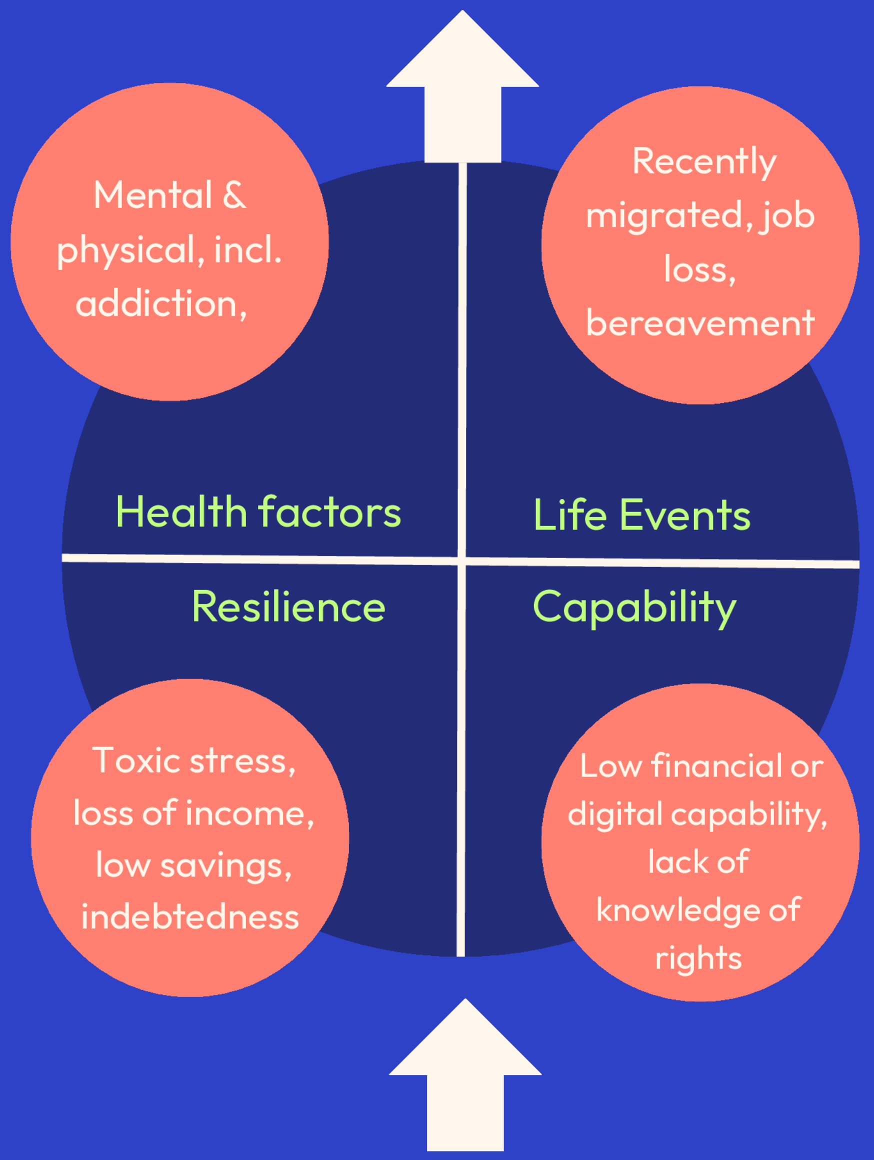


Vulnerability risk factors and drivers that can exacerbate the situation

Economic Abuse is a deliberate action or behaviour perpetrated by a person that controls, restricts or exploits another person's resources.

Economic Harm is the consequence of behaviours which control, restrict or exploit a person's access to economic resources.

E.g.

A customer is in financial difficulty due to being diagnosed with cancer which has forced them to take unpaid leave from their job. They haven't be able to pay their bills, and haven't been supported with hardship or lower cost plans. They are now at risk of being disconnected or having restrictions on their essential services - internet, power and water.

Loss of income, health issue

A customer is in the process of separating their affairs from an abusive relationship. They want to separate their joint bank accounts, mobile phone account and insurance policies. However an organisation cannot act on this request this without consent from the joint account holder (the abuser).

Separation from abuser

An organisation notices that an older customer suddenly has very high energy usage, and hasn't been keeping up with payments, despite having a good track records of paying on time. They make enquiries and suspect exploitative behaviour, but can't make further enquiries or a referral to Age Concern without explicit consent due to privacy issues.

Low self-confidence, Shame, lack of knowledge of rights

A bank notices unusual activity on a customer account which suggests misuse of funds. Investigations indicate that an account authority, who also is the EPOA, is the perpetrator. The bank is unable to take further action.

Impaired decision making, lack of knowledge of rights

A customer discovers her partner has a gambling problem when he starts demanding that she pays all the household expenses including the mortgage payments, which she cannot afford to cover. She calls the bank and her internet provider to see if they can put a gambling block in place, which they can only do with permission from the account holder which he won't give.

Problem Gambling

Groups with higher prevalence and risk of Economic Harm

- Intimate partnerships especially women and rainbow community
- **Older people (first focus)**
- People in care or with diminished capacity
- Families where problem gambling or addiction is present

Other familial considerations:
Traditional home structures where male earners and female home-makers is more common
Collective cultures where sharing resources is common and expected

Coalition Principles

1. Alignment for impact is critical- no single sector or organisation can do this alone
2. Leverage local experience and strengths but draw on international learning
3. Build impact evidence base through data, case studies and modelling
4. Stay curious and open-minded to foster trust & mutual respect
5. Incorporate lived as well as learned experience

Strategic Pillars

PREVENTION

Examples of initiatives coalition could undertake:

- Awareness & education
- Safety by design product / service audits
- Governance, policies, voluntary codes, risk
- Flagging systems
- Staff training and development
- EPOA National Register

INTERVENTION

Examples of initiatives coalition could undertake:

- **Privacy & referral networks (underway)**
- Tools such as Breathing Space

GOVERNANCE

Examples of initiatives coalition could undertake:

- Building trust & collaboration between coalition members
- Social-related financial disclosures
- Data aggregation for story-telling & advocacy
- Impact evaluation; benefit analysis

Coalition to tackle Economic Harm

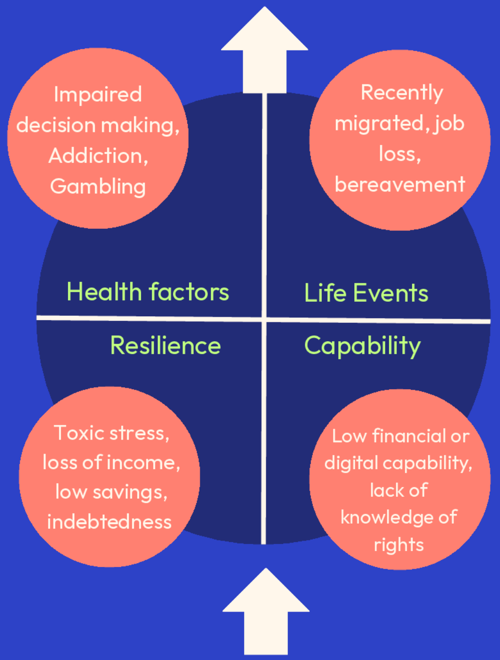
Strategic Goal:

Better outcomes for customers experiencing, or at risk of experiencing, Economic Harm

Strategic Scope:

Economic Harm is the consequence of behaviours which control, restrict or exploit a person's access to economic resources.

Victim-survivors are subject to the intentional acts of their abuser, and the unintentional acts of institutions they interact with



Vulnerability risk factors and drivers that can exacerbate the situation

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Key groups:

- Intimate partnerships especially women and rainbow community
- **Older people (first focus)**
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Cultural Lens

Principles:

- Alignment for impact is critical- no single sector or organisation can do this alone
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Coalition focus for 2025

Scope 1: TRUSTED SYSTEM

Tackling economic harm: how might we get better outcomes for customers experiencing, or at risk of experiencing, economic harm?

Medium - Long term focus

1a

Privacy settings: how might we ensure customers who are in vulnerable circumstances have their privacy rights upheld but are also able to access support from third parties (community & business) in order to prevent harm?

1b

Referral mechanism: how might we build clear and trusted communication channels between community advocates and essential service businesses? (who to contact, how to contact, appropriate responses etc)