

# Financial Abuse Policy and Procedures

TRANSPORT MUTUAL CREDIT UNION

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# 1. Purpose and Scope

## **Purpose:**

Transport Mutual Credit Union (TMCU, the Credit Union) is a signatory to the Customer Owned Banking Code of Practice. One of the key themes in our promises made under the code includes support for vulnerable and at-risk members including the elderly and those suffering from suspected financial abuse.

The purpose of this Financial Abuse Policy & Procedure document is to establish clear guidelines and procedures for the identification, prevention, and response to financial abuse within TMCU. This policy aims to protect our members from financial exploitation, ensure the safety and integrity of their assets, and comply with relevant legal and regulatory requirements.

## **Scope:**

This policy applies to all members, staff, Directors, and stakeholders of the Credit Union, including but not limited to:

- Credit Union members and their designated representatives
- All employees and contractors of the Credit Union
- Directors and Associate Directors of the Credit Union
- Third-party service providers and partners

This policy covers all types of financial abuse, including but not limited to:

- Unauthorised use of a member's funds or assets
- Coercion or manipulation to gain control over a member's financial decisions
- Fraudulent activities, including identity theft and forgery
- Exploitation of vulnerable individuals, such as the elderly or those with disabilities

By implementing this policy, the Credit Union commits to fostering a safe and secure environment where financial abuse is promptly identified, reported, and addressed, ensuring the well-being and trust of our members.
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## 2. Definition of Financial Abuse

Financial abuse is a form of **exploitation** that involves the unauthorised or improper use of an individual's funds, property, or resources. This abuse can occur in various contexts and affect individuals of all ages, though it is particularly prevalent among vulnerable populations such as the elderly and those with disabilities. The following definitions and examples illustrate the scope of financial abuse:

### **Definition:**

Financial abuse refers to any act or omission that involves the misuse, misappropriation, or exploitation of another person's financial assets, which can include money, property, or other valuable resources. This abuse can be perpetrated by family members, caregivers, acquaintances, or strangers, and can occur in various settings, including within the home, in institutions, or through online interactions.

### **Examples of Financial Abuse:**

- **Unauthorised Use of Funds:** Accessing and using a member's bank accounts, credit cards, or other financial resources without permission.
- **Coercion or Manipulation:** Forcing or pressuring a member to make financial decisions that are not in their best interest, such as signing over property or making changes to a will or other legal documents.
- **Fraud and Scams:** Engaging in deceptive practices to gain access to a member's financial assets, including identity theft, phishing schemes, and fraudulent investments.
- **Misuse of Authority:** Abusing a position of trust, such as a power of attorney, to gain control over a member's finances and use them for personal gain.
- **Neglecting Financial Responsibilities:** Failing to fulfill financial obligations on behalf of a member, leading to unpaid bills, loss of services, or depletion of assets.
- **Exploitation of Vulnerability:** Taking advantage of a member's physical, emotional, or cognitive vulnerabilities to manipulate them into financial transactions that benefit the abuser.

### 3. Identification and Detection

To effectively prevent and address financial abuse, it is crucial for staff and stakeholders to be vigilant and capable of **recognising the signs** and indicators of such abuse. This section outlines the methods and red flags to help identify potential cases of financial abuse.

#### Methods of Identification:

- **Monitoring Account Activity:** Regularly review account transactions for unusual or suspicious activity, such as large withdrawals, frequent transfers to unfamiliar accounts, or sudden changes in spending patterns.
- **Member Interactions:** Pay close attention to members' behaviour and interactions during communications with TMCU. Be alert to signs of distress, confusion, or anxiety when discussing financial matters.
- **Feedback and Complaints:** Encourage members to provide feedback and report any concerns they may have about their financial accounts or transactions. Explain with empathy and clarity our process for lodging complaints including escalation to AFCA.
- **Training and Education:** Ensure that all staff members are trained to recognise the signs of financial abuse and understand the procedures for reporting and escalating concerns.

#### Red Flags and Warning Signs:

- **Unusual Account Activity:**
  - Sudden, large, or unexplained withdrawals or transfers.
  - Uncharacteristic spending patterns or changes in financial habits.
  - Multiple transactions in a short period, particularly to unfamiliar accounts.
- **Behavioural Indicators:**
  - Members appearing confused, nervous, or fearful when discussing finances.
  - Members showing signs of coercion, such as hesitating to make decisions without another person's approval.
  - Unusual or sudden changes in a member's demeanour, such as becoming withdrawn or secretive about financial matters.
- **Third-Party Actions:**
  - A third party accompanying the member to the Credit Union and appearing overly controlling or speaking on behalf of the member on the phone, without their consent.
  - New, unfamiliar individuals suddenly becoming involved in the member's financial affairs.
  - Requests for changes to account details or authorisations that seem out of character for the member.
- **Document Changes:**
  - Sudden changes to wills, powers of attorney, or other legal documents that benefit a new or unexpected party.
  - Unexplained updates to account ownership, beneficiaries, or contact information.

### Reporting and Escalation:

- **Immediate Action:** Staff should immediately report any suspected cases of financial abuse to the Operations Supervisor or Management.
- **Documentation:** Maintain detailed records of all suspected cases, including observations, interactions, and any actions taken.
- **Follow-Up:** Ensure timely follow-up on reported cases, including appropriate investigations and interventions to protect the member's assets and well-being.

*Staff tip - Be proactive! In so doing, financial abuse can be swiftly recognised and addressed, safeguarding the financial security of all members.*

## 4. Roles and Responsibilities

The effective implementation of the Financial Abuse Policy requires clear delineation of roles and responsibilities among the Credit Union's staff and stakeholders. This section outlines the specific duties and responsibilities assigned to different roles within the organisation to ensure the prevention, detection, and response to financial abuse.

### Board of Directors:

- **Policy Oversight:** Responsibility for establishing and maintaining the Financial Abuse Policy, ensuring annual review, and updated from TMCU's experience and learnings as necessary.
- **Governance and Compliance:** Oversee the Credit Union's compliance with relevant laws and regulations related to financial abuse.
- **Resource Allocation:** Provide adequate resources and support for the implementation and enforcement of the policy.

### Senior Management:

- **Policy Implementation:** Develop and implement procedures and controls to support and enforce the Financial Abuse Policy.
- **Training and Awareness:** Ensure that all staff members receive regular training on financial abuse identification, reporting, and prevention.
- **Incident Response:** Coordinate the investigation and resolution of reported cases of financial abuse, including collaboration with external agencies as needed.
- **Regulatory Liaison:** Serve as the primary point of contact with regulatory bodies regarding financial abuse matters.

### Operations Supervisor:

- **Monitoring and Reporting:** Monitor compliance with the Financial Abuse Policy and report any issues to senior management and the Board.
- **Incident Management:** Lead the investigation of suspected financial abuse cases and ensure appropriate actions are taken in line with this policy.
- **System Monitoring:** Monitor the Credit Union's systems for unusual or suspicious activity that may indicate financial abuse.

### Member Service Officers:

- **Detection and Reporting:** Identify and report any signs of financial abuse encountered during daily interactions with members.
- **Member Support:** Provide support and guidance to members who may be victims of financial abuse, including information on available resources and assistance.
- **Confidentiality:** Maintain the confidentiality of all reports and investigations related to financial abuse.

**IT Officer:**

- **Data Protection:** Ensure the security of member data and protect against unauthorised access that could lead to financial abuse.
- **Incident Response Support:** Assist the Operations Supervisor in the technical aspects of investigating and resolving incidents of financial abuse.

*Staff Tip - Stay informed about the signs of financial abuse and remain vigilant in identifying potential cases. Comply with the Financial Abuse Policy and related procedures in all interactions with members. Uphold the highest standards of ethical conduct to foster a safe and trustworthy environment for all members.*



## 5. Reporting and Escalation Procedures

Establishing clear reporting and escalation procedures is critical for the timely and effective response to suspected cases of financial abuse. This section outlines the steps staff should follow when they identify or suspect financial abuse, ensuring that all reports are handled confidentially and appropriately.

### Reporting Suspected Financial Abuse:

- **Immediate Reporting:** Any staff member who identifies or suspects financial abuse must report it immediately to the Operations Supervisor or Management.
- **Documentation:** Record all relevant details, including the member's name, account information, nature of the suspected abuse, and any supporting evidence or observations.
- **Confidentiality:** Ensure that all reports and related information are kept confidential and shared only with authorised personnel involved in the investigation.

### Escalation Procedures:

- **Initial Assessment:** The Operations Supervisor will conduct an initial assessment of the report to determine the severity and credibility of the suspicion.
- **Internal Escalation:** If the initial assessment indicates a plausible case of financial abuse, escalate the matter to senior management and, if necessary, the Board of Directors.
- **External Reporting:** Where required, Management will report the suspected financial abuse to relevant external agencies, such as NSW Police, regulatory bodies, or the Department of Social Security, in accordance with legal and regulatory requirements.

### Investigation Process:

- **Investigation Team:** Management may assemble an investigation team that includes the Chief Risk Officer, legal advisors, relevant senior management, Directors, and any necessary technical or legal experts depending on the needs of the investigation.
- **Gathering Evidence:** The team will collect and review all pertinent information, including account statements, transaction records, communications, and any other relevant documentation.
- **Member Interaction:** The team may engage with the affected member to gather their perspective, offer support, and provide information about the investigation process.

### Resolution and Follow-Up:

- **Findings and Actions:** Based on the investigation findings, appropriate actions will be taken, which may include freezing of accounts, reversing unauthorised transactions, and taking legal action against the perpetrator.
- **Member Support:** TMCU must always offer continuing support and assistance to the affected member, including referrals to external support services as needed.

- **Reporting Outcomes:** The team will document the outcomes of the investigation and actions taken, and for transparency report these outcomes to the Board &/or any external agencies as required.

#### **Continuous Improvement:**

- **Review and Feedback:** After resolving each case, review the reporting and escalation process to identify any areas for improvement.
- **Policy Updates:** Update the Financial Abuse Policy and related procedures based on lessons learned from each case to enhance the Credit Union's ability to prevent and respond to financial abuse effectively.

## 6. Member Protection and Support

Providing **timely** protection and support to members who may be victims of financial abuse is a crucial aspect of our Financial Abuse Policy. This section outlines the measures we will take to safeguard members' interests and offer necessary assistance.

### Immediate Protection Measures:

- **Account Security:** Immediately secure the member's accounts to prevent further unauthorised access or transactions. This may include freezing accounts or changing account access credentials.
- **Temporary Holds:** Place temporary holds on suspicious transactions while investigations are conducted to prevent further exploitation.
- **Fraud Alerts:** Implement fraud alerts and monitoring services to detect and prevent further abuse. Liaise with COBA Fraud & Financial Crimes if there is a likelihood of other ADIs being impacted.

### Member Support Services:

- **Personalised Assistance:** TMCU will provide personalised assistance to affected members, including one-on-one support from senior management trained in handling financial abuse cases.
- **Resource Referrals:** TMCU will offer referrals to external support services, such as legal aid, language translation services, elder abuse hotlines, to provide comprehensive support to members.
- **Financial Counselling:** TMCU will provide free financial counselling services to help members understand their financial situation, recover from any losses, and protect their assets in the future.

### Communication and Confidentiality:

- **Clear Communication:** Staff must maintain clear and **empathetic** communication with the affected member throughout the investigation and resolution process. The member will be informed in writing of all actions taken and any outcomes.
- **Confidential Handling:** Staff must ensure that all information related to the suspected abuse and the member's personal details are handled with the utmost confidentiality, shared only with authorised personnel or 3<sup>rd</sup> parties involved in the case.

### Restorative Actions:

- **Unauthorised Transactions:** Wherever possible, unauthorised transactions must be reversed and restored to the member's accounts.
- **Restitution Efforts:** TMCU should pursue restitution efforts against the perpetrator to recover any losses incurred by the member.
- **Legal Support:** TMCU will assist members in accessing legal support to address any legal implications arising from the abuse.

### **Ongoing Monitoring and Support:**

- **Follow-Up:** Senior staff should conduct and document regular follow-up with the affected member to ensure their ongoing safety and well-being. Provide continued support and resources as needed and escalate any matters of concern to senior Management.
- **Preventive Measures:** Senior staff should take the opportunity to educate members on preventive measures to protect themselves from future financial abuse, including safe banking practices and recognising common fraud schemes.

### **Staff Training and Sensitivity:**

- **Training Programs:** TMCU will implement training programs for staff to ensure they are equipped to handle financial abuse cases sensitively and effectively.

*Staff tip! - approach each case with empathy and understanding, recognising the emotional and psychological impact financial abuse can have on victims.*

## 7. Investigation Process

A **thorough** and methodical investigation process is essential for effectively addressing and resolving cases of suspected financial abuse. This section outlines the steps involved in investigating reports of financial abuse to ensure a fair, comprehensive, and timely response.

### Initial Response:

- **Acknowledgment:** TMCU will acknowledge receipt of the report of suspected financial abuse promptly, ensuring the reporting party that the matter is being taken seriously. Best practice timeframe for acknowledgement is within one business day.
- **Preliminary Assessment:** Senior staff will conduct a preliminary assessment to determine the validity and severity of the allegations. This includes reviewing initial evidence, checking system records and consulting with relevant staff.

### Investigation Team:

- **Formation:** TMCU may assemble an investigation team that includes the Chief Risk Officer, relevant senior management, Directors and any necessary technical or legal experts.
- **Roles and Responsibilities:** Senior Management will clearly define and document the roles and responsibilities of each team member to ensure a coordinated investigation effort.

### Evidence Collection:

- **Documentation Review:** The team will gather and review all pertinent documents, including account statements, transaction records, communications, and any other relevant data.
- **Interviews:** Interviews with the affected member, involved members of staff, and any other relevant parties to gather comprehensive information about the incident.
- **Technical Analysis:** TMCU may utilise any technical resources necessary to analyse electronic records and identify patterns or anomalies that indicate financial abuse.

### Investigation Procedures:

- **Fact-Finding:** The team will follow a systematic approach to uncover all relevant facts, ensuring that the investigation is thorough and unbiased.
- **Confidentiality:** It is a requirement to maintain strict confidentiality throughout the investigation to protect the privacy of all parties involved.
- **Legal and Regulatory Compliance:** All investigative actions must comply with relevant laws and regulations, including data protection and **privacy** standards.

### Decision-Making:

- **Analysis and Findings:** The team will analyse the collected evidence to determine the nature and extent of the financial abuse.
- **Recommendations:** The team will develop recommendations for corrective actions based on the investigation findings. This may include reversing unauthorised transactions, enhancing account security, or pursuing legal action against the perpetrator.

### Reporting:

- **Internal Reporting:** The team must prepare a detailed report of the investigation findings and recommendations for the Board of Directors.
- **External Reporting:** Where required, the team will report the findings to relevant external agencies, such as law enforcement or regulatory bodies, in accordance with legal obligations.

### Resolution and Follow-Up:

- **Implementing Actions:** Implement the recommended actions to resolve the case and prevent further abuse. This may involve working with law enforcement, legal representatives, Government agencies and external support services.
- **Member Support:** TMCU must provide ongoing support to the affected member, including financial counselling at no cost, assistance with legal matters, and referrals to 3<sup>rd</sup> party support services as needed.
- **Monitoring:** The team must monitor the situation to ensure that the implemented actions are effective and that the member is no longer at risk of financial abuse. If ongoing abuse is suspected, TMCU may restart investigations as necessary.

*Management Tip! - A review of the investigation process after each case may identify areas for improvement. The Financial Abuse Policy and related procedures should also be reviewed based on lessons learned from each case, to enhance the Credit Union's ability to prevent and respond to financial abuse effectively.*

## 8. Training and Awareness

To effectively prevent and respond to financial abuse, it is essential for all Credit Union staff to be well-informed and vigilant. This section outlines the training and awareness initiatives designed to equip staff with the knowledge and skills necessary to identify, report, and address financial abuse.

### Training Programs:

- **Comprehensive Training:** TMCU must develop and implement a comprehensive training program for all staff members, covering the definitions, signs, and procedures related to financial abuse. The training may be provided from an internal or outsourced resource, as necessary.
- **Regular Updates:** Training sessions are to be conducted regularly, with updates provided to reflect changes in regulation, emerging trends, and best practices in financial abuse prevention and response.
- **Scenario-Based Learning:** Training may include scenario-based learning and case studies in training programs to provide practical insights and reinforce the application of policy and procedures.

### Key Training Topics:

- **Understanding Financial Abuse:** Staff is to be educated on the various forms of financial abuse, including unauthorised use of funds, coercion, fraud, and exploitation.
- **Detection Techniques:** Training on how to recognise red flags and warning signs of financial abuse, such as unusual account activity and behavioral indicators are important.
- **Reporting Procedures:** TMCU must clearly outline the steps for reporting suspected financial abuse, emphasising the importance of timely and accurate reporting.
- **Investigation Process:** TMCU's training should familiarise staff with the **investigation process**, including evidence collection, confidentiality, and collaboration with external agencies.
- **Member Support:** Training will provide guidance on how to support members who may be victims of financial abuse, including offering resources and referrals.

### Awareness Initiatives:

- **Internal Communication:** TMCU can use internal communication channels to regularly share information and updates on financial abuse prevention, including success stories and lessons learned from past cases.
- **Promotional Materials:** TMCU should develop and distribute promotional materials, such as brochures, newsletters and digital content, to raise awareness about financial abuse among staff and members.
- **Awareness Campaigns:** Awareness campaigns should be implemented to highlight the importance of financial abuse prevention and encourage proactive measures among staff and members.

- **Educational Resources:** TMCU should regularly provide members with educational resources on how to protect themselves from financial abuse, including tips on recognising scams and safeguarding personal information.

*Management tip! - evaluate the effectiveness of training programs through assessments, feedback surveys, and performance metrics. Use the feedback and evaluation results to continuously improve training content and delivery methods, ensuring that staff remains well-equipped to handle financial abuse cases.*



## 9. Collaboration with External Agencies

Effective collaboration with external agencies is crucial for addressing financial abuse comprehensively. This section outlines the protocols for working with law enforcement, regulatory bodies, Government agencies and other relevant organisations to ensure a coordinated and robust response to financial abuse cases.

### Establishing Relationships:

- **Identify Key Agencies:** Management is encouraged to identify and establish relationships with key external agencies, including NSW law enforcement, regulatory bodies, legal aid organisations, and Government services.
- **Points of Contact:** Management should designate specific points of contact within the Credit Union and each external agency to facilitate communication and coordination.

### Information Sharing:

- **Confidentiality Agreements:** TMCU will ensure that confidentiality agreements are in place to protect sensitive information shared between the Credit Union and all external agencies. If necessary, TMCU's legal advisors may assist in this respect.
- **Timely Reporting:** TMCU will develop protocols for the timely reporting of suspected financial abuse cases to external agencies, in compliance with legal and regulatory requirements, and disclose these KPIs in its Board reporting of abuse cases.
- **Comprehensive Documentation:** TMCU will maintain comprehensive documentation of all interactions and information shared with external agencies to ensure transparency and accountability.

### Collaborative Investigations:

- **Joint Investigations:** Collaborate with external agencies on joint investigations, providing access to relevant records, transaction data, and other necessary information.
- **Expert Consultation:** Seek expert consultation from external agencies on complex cases of financial abuse, leveraging their specialised knowledge and resources.
- **Case Conferences:** Participate in case conferences with external agencies to discuss findings, coordinate actions, and develop joint strategies for addressing financial abuse.

### Legal and Regulatory Compliance:

- **Regulatory Reporting:** TMCU must ensure compliance with all regulatory reporting requirements by timely and accurately reporting suspected financial abuse cases to the appropriate regulatory bodies.
- **Legal Proceedings:** TMCU will where required, collaborate with law enforcement and legal representatives in pursuing legal actions against perpetrators of financial abuse, providing necessary evidence and testimony as required.

## 10. Confidentiality and Data Protection

Ensuring the **confidentiality** of reports and investigations related to financial abuse is paramount to protecting the privacy and rights of all parties involved. This section outlines the measures the Credit Union will take to safeguard sensitive information and comply with data protection laws and regulations.

### Confidentiality Principles:

- **Privacy Assurance:** TMCU must ensure that all reports of suspected financial abuse and related investigations are handled with the highest level of confidentiality.
- **Authorised Access:** Access to confidential information will be on a need to know basis, to authorised personnel directly involved in the investigation or resolution of the case.

### Data Protection Measures:

- **Secure Storage:** TMCU will ensure that all records, documents, and electronic data related to financial abuse cases are stored securely, using encryption and access controls where appropriate.
- **Information Handling:** TMCU will provide secure handling, transmission, and disposal of sensitive information to prevent unauthorised access or disclosure.
- **Legal Compliance:** TMCU will adhere to all applicable data protection laws and regulations, including those related to the collection, use, and sharing of personal information.
- **Regular Audits:** Internal audit will periodically review handling of any financial abuse cases, to ensure compliance with data protection standards and identify areas for improvement.

## 11. Consequences and Disciplinary Actions

To maintain the integrity of the Financial Abuse Policy and ensure its effective implementation, it is essential to outline the **consequences and disciplinary actions** for staff or members found to be engaging in financial abuse. This section details the procedures and potential penalties for violating the policy.

### Consequences for Staff:

#### 1. Investigation and Review:

- **Immediate Suspension:** Staff members suspected of financial abuse may be immediately suspended from their duties pending investigation.
- **Internal Investigation:** TMCU will conduct a thorough internal investigation to ascertain the facts and determine the extent of the abuse.

#### 2. Disciplinary Actions:

- **Warnings and Reprimands:** TMCU may issue formal warnings or reprimands for minor infractions or first-time offenses where the impact of the abuse is minimal.
- **Probation:** TMCU may place the staff member on probation with close monitoring of their activities and performance.
- **Termination of Employment:** TMCU may terminate the employment of staff members found to be engaging in serious or repeated financial abuse.
- **Legal Action:** TMCU may pursue legal action against the staff member if their actions constitute a criminal offense, including cooperation with law enforcement and regulatory bodies.

#### 3. Rehabilitation and Support:

- **Counselling and Training:** TMCU may provide counselling and additional training to staff members where appropriate, to address underlying issues and prevent future occurrences.

### Consequences for Members:

#### 1. Account Review and Restrictions:

- **Account Monitoring:** TMCU may place members on a watch list, and closely monitor the accounts of members suspected of financial abuse.
- **Transaction Restrictions:** TMCU may impose restrictions or limitations, on certain types of transactions to prevent further abuse.

#### 2. Membership Actions:

- **Warnings and Suspensions:** TMCU may issue formal warnings or suspend the membership privileges of individuals involved in financial abuse.
- **Account Closure:** TMCU may close the accounts of members found to be engaging in serious or repeated financial abuse, following a thorough investigation.

#### 3. Legal Action:

- **Restitution Efforts:** TMCU will assist or pursue restitution efforts to recover any funds or assets misappropriated by the member.

- **Criminal Prosecution:** TMCU will work with law enforcement to prosecute members whose actions constitute criminal financial abuse.

*Management Tip! - Ensure that all staff **and members** are aware of the Financial Abuse Policy and the consequences of violating it. Apply disciplinary actions impartially and consistently to all individuals, regardless of their position or relationship with the Credit Union. Establish an appeal process to allow individuals to contest disciplinary actions if they believe they have been unfairly treated.*

## 12. Policy Review and Updates

Regular review and updates of the Financial Abuse Policy are essential to ensure its effectiveness and relevance in addressing emerging threats and complying with legal and regulatory changes. This section outlines the procedures for the periodic review, evaluation, and updating of the policy.

### Scheduled Reviews:

- **Annual Review:** TMCU will conduct a comprehensive review of the Financial Abuse Policy at least once a year to ensure it remains current and effective.
- **Interim Reviews:** TMCU may perform additional reviews as needed in response to significant changes in the regulatory environment, emerging financial abuse trends, or after a major incident.

### Review Process:

- **Stakeholder Involvement:** TMCU will involve key stakeholders, including the Board of Directors, senior management, risk and audit officers, and frontline staff, in the review process to gain diverse perspectives and insights.
- **Data Analysis:** TMCU will analyse data from financial abuse incidents, training evaluations, and audit reports to identify patterns, gaps, and areas for enhancement.
- **Incorporate Changes:** TMCU will update the policy to reflect new laws, regulations, and best practice in financial abuse prevention and response.
- **Staff Training:** Management will provide training on policy updates to all relevant staff members, ensuring they understand the changes and how to apply them in their roles.
- **Member Education:** TMCU will educate members about significant policy updates, emphasising how these changes enhance their protection and security.