Australian financial services industry whitepaper

The Invisible Dropout: Findings from the Financial Hardship Accessibility Index (HAI)

Based on website scan data collected March 2026

Prepared by Humbli, April 2026

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Executive Summary

For most customers, the first practical step in seeking financial hardship assistance is to visit their lender's website. The quality of what they find there shapes whether they engage with the lender's hardship process at all.

This whitepaper presents an empirical review of how the Australian lending sector is performing on website-based hardship communication. Humbli's Hardship Accessibility Index (HAI), developed with research services provided by the University of Technology Sydney, evaluates the websites of 120 of Australia's largest consumer lenders, those subject to hardship obligations under the National Credit Code, against more than 40 criteria across five categories.[1] It provides sector-level evidence of how lenders have responded to the practical actions ASIC set out in REP 782.[2]

The findings show that performance is uneven across the industry, with the weakest categories the ones most directly relevant to customers whom ASIC found are at increased risk of harm when seeking hardship assistance. The consequence is that **some customers never give a hardship notice because the help available is not surfaced on their lender's website; this is the invisible dropout**. These customers are invisible to the lender, absent from the data, and at greater risk of harm.

What we found[3]

1. The industry mean overall HAI score is 5.7 out of 10. Performance varies by segment: ADIs average 7.1, Mutuals 6.1, and non-ADI lenders 4.4.
2. Fifty-two per cent of lenders do not meet all four of ASIC's practical actions for website content. Thirty-seven per cent do not feature hardship information prominently, 33 per cent do not encourage early contact, and 22 per cent do not state that a hardship notice can be given at any time.
3. The two weakest categories across the industry are Vulnerable Customer Care, with a mean of 3.6 out of 10, and External & Independent Help, with a mean of 5.2. These categories are most directly relevant to the many customers who, on ASIC's findings in REP 782, are at increased risk of harm when seeking hardship assistance.
4. Non-ADI lenders perform below the industry mean on every category. Their mean Vulnerable Customer Care score is 1.9, with a median of 0.5; their mean External & Independent Help score is 3.3, with a median of 1.2.
5. ADIs and Mutuals perform above the industry mean across categories, though neither segment can be considered strong on Vulnerable Customer Care.

What needs to happen

Every lender should uplift performance in the two weakest categories: Vulnerable Customer Care and External & Independent Help. Non-ADI lenders should revisit their hardship content systematically. Industry bodies should continue to raise standards through their codes, with the forthcoming AFIA Finance Industry Code of Practice,[4] the ABA Banking Code of Practice[5] and the Customer Owned Banking Code of Practice Review[6] providing immediate platforms. Humbli will publish updated HAI scores in October 2026 and will work with industry to better understand the invisible dropout.

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1. See Part 4 of this paper for further information on the HAI.
2. Australian Securities and Investments Commission, Report 782: Hardship, hard to get help: Findings and actions to support customers in financial hardship, May 2024, https://asic.gov.au/regulatory-resources/find-a-document/reports/rep-782-hardship-hard-to-get-help-findings-and-actions-to-support-customers-in-financial-hardship/ (REP 782).
3. See Part 5 of this paper for full findings, segment-level analysis and category-level performance.
4. Australian Finance Industry Association, Finance Industry Code of Practice, Version 2.0 December 2025, accessible at https://www.afia.asn.au/codesofpractice.
5. Australian Banking Association, Banking Code of Practice, 28 February 2025, accessible at https://www.ausbanking.org.au/banking-code/.
6. Customer Owned Banking Association, 2022 Customer Owned Banking Code of Practice (version 2.0, effective 28 October 2023), currently under independent review with a final report due to COBA by 30 June 2026), see https://www.customerownedbanking.asn.au/code-review-process/.

1. The Australian financial hardship landscape

1.1 Consumers experience financial difficulty for a wide range of reasons

Financial hardship has many causes. ASIC's most recent published analysis, set out in REP 782 and based on hardship notices given to ten large home lenders between July 2022 and December 2023, sets out the driver composition.

Four drivers accounted for more than 80 per cent of hardship notices in that period: overcommitment (29 per cent), reduced income (20 per cent), unemployment (16 per cent) and medical issues (16 per cent). The remaining notices reflected a wide range of life events, including separation, bereavement, business downturn, parental leave, abuse and natural disaster.

Customers in hardship rarely fit a single profile, and the circumstances that bring them there are not always ones they anticipated.

1.2 Cost-of-living pressures continue to drive hardship

The RBA cash rate peaked at 4.35 per cent in November 2023. The Reserve Bank then delivered three cuts through 2025, taking the rate to 3.60 per cent by August.[7] Two increases in early 2026 have returned the rate to 4.10 per cent, with the next RBA Board meeting scheduled for 5 May 2026.[8]

According to Roy Morgan, in August 2023, around 1.57 million Australian mortgage holders (30.2 per cent) were at risk of mortgage stress.[9] That share fell through 2025 as the RBA cut rates, reaching 24.5 per cent (around 1.19 million households) by December 2025. It has begun rising again in 2026 following two RBA rate increases in February and March. The level of household pressure is approaching levels comparable to those that produced hardship volumes at the August 2023 peak.

7. Reserve Bank of Australia, Cash Rate Target. The three 2025 reductions occurred in February, May and August 2025, taking the rate from 4.35 per cent to 3.60 per cent. See https://www.rba.gov.au/statistics/cash-rate/.
8. Reserve Bank of Australia, Cash Rate Target. The two 2026 increases occurred on 3 February 2026 and 17 March 2026, taking the rate from 3.60 per cent to 4.10 per cent. See https://www.rba.gov.au/statistics/cash-rate/.
9. Roy Morgan classifies a mortgage holder as "at risk" when their loan repayments exceed a defined share of household after-tax income (typically 25 to 45 per cent depending on income and spending), based on the appropriate standard variable rate reported by the RBA and the amount initially borrowed. The metric captures the share of Australian households whose mortgage repayments are absorbing more of their income than they can sustainably afford. Sources: Roy Morgan, A record high 1.57 million Australians are now 'At Risk' of 'mortgage stress' representing 30.2% of mortgage holders (August 2023 release), https://www.roymorgan.com/findings/9349-mortgage-stress-risk-august-2023; Risk of mortgage stress drops to lowest for three years (December 2025 release), https://www.roymorgan.com/findings/10118-mortgage-stress-risk-december-2025; Risk of mortgage stress up 1.9% points in March after the Reserve Bank raised interest rates for second straight month (March 2026 release), https://www.roymorgan.com/findings/10198-mortgage-stress-risk-march-2026.

1.3 Hardship and vulnerability often coincide

REP 782 found that many customers giving a hardship notice are at increased risk of harm. Hardship itself can heighten stress and impair a customer's ability to engage with complex processes. Customers may also be navigating vulnerabilities beyond their finances, relating to health, life events such as bereavement or separation, and capability.[10]

ASIC expects lenders to identify customers experiencing vulnerability and to take extra care or provide additional support where required, without applying narrow definitions of vulnerability. The implication for the hardship pathway, including the website content a customer first encounters, is that it must accommodate the reality that hardship and vulnerability often coexist, with specialised support made available where it is needed.

10. REP 782 Executive Summary at paragraph 15 and Section I (Supporting customers experiencing vulnerability) at pp 117–123.

2. The regulatory and industry framework for hardship

2.1 Lender obligations under the National Credit Code

The National Credit Code sets out what must happen when a customer gives notice that they are unable to meet their obligations under a credit contract. Under section 72, the lender must decide whether to vary the contract, and the customer is entitled to a written decision either way.

Where the lender agrees to vary the contract, the written notice must set out the change. Where the lender does not agree, it must provide written reasons together with the customer's rights under the Australian Financial Complaints Authority (AFCA) scheme and AFCA's contact details.[11] These obligations sit within the broader licensee duty under section 47 of the National Consumer Credit Protection Act 2009 (Cth), which requires credit activities to be engaged in efficiently, honestly and fairly.[12]

2.2 ASIC's open letter and REP 782

In August 2023, ASIC issued an open letter to lender CEOs, advising of its heightened focus on financial hardship and its expectations of lenders, and outlining 12 areas for lenders to focus on to meet their obligations to customers experiencing financial hardship.[13]

In May 2024, following its review of ten large home lenders, ASIC published *REP 782, Hardship, hard to get help: Findings and actions to support customers in financial hardship*, which set out the findings of that review and the practical actions lenders could take to support customers.

REP 782 reported that approximately 35 per cent of customers who gave a hardship notice dropped out of the process at some stage, often because of barriers in the assessment process itself. ASIC found that lenders did not consistently make it easy for customers to give a hardship notice, that assessment processes often placed unnecessary requirements in the way of customers seeking assistance, and that the assistance ultimately provided was frequently not tailored to a customer's individual circumstances.[14]

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11. National Credit Code (Schedule 1 to the National Consumer Credit Protection Act 2009 (Cth)), s 72.
12. National Consumer Credit Protection Act 2009 (Cth), s 47.
13. ASIC, Media Release 23-235MR, 30 August 2023, accessible at https://www.asic.gov.au/about-asic/news-centre/find-a-media-release/2023-releases/23-235mr-as-cost-of-living-pressures-persist-asic-calls-on-lenders-to-support-customers-in-financial-hardship/. The accompanying open letter outlined 12 areas of focus, accessible at https://download.asic.gov.au/media/ig0h44sg/23-235mr-letter-to-ceos-on-supporting-consumers-experiencing-financial-hardship-published-30-august-2023.pdf.
14. REP 782 at paragraph 16.

2.3 Industry codes have responded in parallel

Each of the principal industry codes governing Australian lenders has been revised, replaced or is currently under review since the publication of REP 782, and the direction of travel across all three is consistent. The Australian Banking Association's (ABA) 2025 Banking Code of Practice took effect in early 2025. The Australian Finance Industry Association's (AFIA) Finance Industry Code of Practice, the first industry code specifically governing non-bank lenders, was published in late 2025 and takes effect in late 2026. The Customer Owned Banking Association's (COBA) review of its 2022 Customer Owned Banking Code of Practice is underway, with the final report due in mid-2026.

Three themes are common across the codes:

1. The first is broader definitions of vulnerability. The ABA Code expands the list of vulnerability characteristics to 14, including financial difficulty itself, literacy and language barriers, cultural background, Aboriginal and Torres Strait Islander status, remote location and incarceration.[15] The AFIA Code adopts a similarly broad, non-exhaustive list covering cognitive impairment, family and domestic violence, financial abuse, mental health, addiction, serious illness and insecure housing.[16]
2. The second is explicit recognition that any customer may experience vulnerability and that circumstances may change over time, rather than vulnerability being a fixed trait of a defined cohort. The ABA Code states that all customers may be at risk of experiencing vulnerability and that circumstances may change in response to particular situations.[17] The AFIA Code expressly recognises that vulnerability may be temporary.[18] COBA's review is examining vulnerability provisions as part of its scope.[19]
3. The third is stronger obligations on hardship identification and response. The ABA Code requires banks to proactively identify indicators of financial difficulty, work with customers toward sustainable solutions, publish their financial difficulty processes, and provide written reasons for their decisions.[20] The AFIA Code introduces hardship provisions for consumer credit customers, the first time non-bank lenders have been subject to dedicated industry code obligations on hardship, and enumerates the circumstances in which assistance may not be offered.[21] The COBA Code's current hardship provisions sit within the scope of the review.[22]

Taken together, this direction of travel is consistent with the practical actions ASIC set out in REP 782 and with the efficient, honest and fair standard under section 47 of the National Consumer Credit Protection Act 2009.

15. ABA 2025 Banking Code of Practice at paragraph 52 (vulnerability characteristics), accessible at https://www.ausbanking.org.au/wp-content/uploads/2021/06/Banking-Code-of-Practice-28.02.25.pdf.
16. AFIA Finance Industry Code of Practice at paragraph 74 (vulnerability list), accessible at https://static1.squarespace.com/static/63b7ac2f8485d929e7851d13/t/694a2012f811b114e7be1178/1766465554217/AFIA+Finance+Industry+Code+of+Practice+UPDATE+v2+December+2025.pdf.
17. ABA 2025 Banking Code of Practice at paragraph 52 (vulnerability characteristics).
18. AFIA Finance Industry Code of Practice at paragraph 73 (people experiencing vulnerability).
19. COBA Code Review Consultation Paper Part 6 (experiences of Vulnerability & Safety).
20. ABA 2025 Banking Code of Practice at Part D (when things go wrong).
21. AFIA Finance Industry Code of Practice Part C, paragraphs 63–71.
22. COBA Code Review Consultation Paper Part 4 (experiences of financial hardship).

3. The customer-facing environment

3.1 Websites are the critical first touchpoint

Customer interactions with banks are now overwhelmingly digital. According to the ABA's 2025 *Bank On It* report, more than 99 per cent of customer interactions with major banks were conducted through digital channels in 2024.[23] The lender's website is therefore the most likely first touchpoint for a customer considering whether and how to seek hardship assistance. For many customers it is not one of several channels but the gateway through which all other channels become visible.

3.2 ASIC's practical actions on website content

Four of the practical actions ASIC set out in REP 782 relate directly to lender website content, and provide a baseline rather than a ceiling against which any lender's website can be assessed.[24]

1. **Publicise availability**. Make information about the availability of hardship assistance, and how customers can request it, available on the lender's website.
2. **Prominence**. Feature that information prominently on the website, rather than relegating it to a peripheral position such as a submenu or footer.
3. **Anytime notice**. Ensure the information is clear that customers can give a hardship notice whenever they are unable to meet their obligations, and that the difficulty does not need to be tied to a particular life event or change in circumstances.
4. **Early contact**. Ensure the information encourages customers to reach out early, ideally before they miss a payment.

These four actions describe the minimum content a customer in hardship would reasonably expect to find on a lender's website. They are a baseline rather than a ceiling, and the HAI assesses website content against a broader set of criteria, set out in Part 4.

3.3 The customer context shapes website design

REP 782 found that many customers giving a hardship notice are at increased risk of harm, in part because hardship itself can heighten stress and impair a customer's ability to engage with complex processes.[25]

Hardship content written primarily for legal compliance can therefore deter engagement. Modest friction at the website stage, including information that is missing, hard to find, or difficult to interpret, can be sufficient to cause a customer to disengage before any contact is made with the lender's hardship team.

23. Australian Banking Association, 2025 Bank On It Report, accessible at https://www.ausbanking.org.au/wp-content/uploads/2025/06/252903-Bank-on-It-Report-2025-ART-WEB.pdf.
24. REP 782 Table 2: How lenders can improve support for customers experiencing financial hardship, in particular the action area "Ensure customers know hardship assistance may be available". The four website-content actions listed in this section are drawn from that area.
25. REP 782 at paragraph 15.

3.4 The invisible dropout

REP 782 reported that approximately 35 per cent of customers who gave a hardship notice dropped out of the process at some stage.[26] Upstream of that figure sit customers who never give a hardship notice at all, because their lender's website does not adequately surface the help available to them.

This cohort is, by definition, invisible to the lender and absent from their data. Website content sits upstream of the formal hardship process and shapes which customers reach it.

26. REP 782 at paragraph 16.

4. The Hardship Accessibility Index

4.1 Purpose and approach

The *Hardship Accessibility Index* (HAI) is an assessment framework developed by Humbli to evaluate how effectively Australian lenders make financial difficulty support visible, accessible and actionable to customers through their publicly available websites. The HAI extends beyond the four practical actions ASIC set out in REP 782, providing a structured, multi-dimensional view of the customer experience on a lender's website.

The HAI evaluates 120 Australian lender websites. The cohort comprises 17 ADIs, 60 Mutuals and 43 non-ADI lenders, and covers members of the ABA, AFIA and COBA industry bodies.[27]

4.2 Sources that inform the methodology

The HAI is grounded in Australian regulatory guidance, industry obligations and good-practice design principles relevant to hardship communication. Sources include the National Credit Code, ASIC reports and regulatory guidance (including REP 782 and Moneysmart guidance), the industry codes of practice across the banking, non-bank and mutual sectors, AFCA's approach to financial difficulty, accessibility standards including WCAG 2.2, and established principles of plain language, trauma-informed design and digital user experience.

The HAI methodology was developed with research services provided by the University of Technology Sydney.

4.3 The five categories

The HAI is organised across five categories, each focused on a distinct point in the customer's journey from finding information, to understanding eligibility, to feeling supported to act, to being connected with independent support.

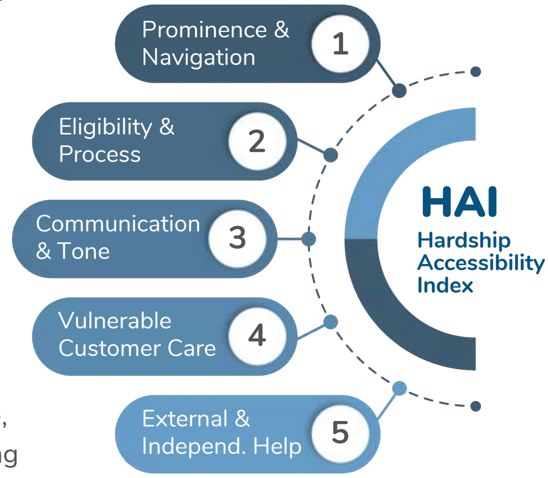
HAI Category 1. Prominence & Navigation - evaluates how well a customer in financial difficulty can find hardship support without prior knowledge of where to look, and whether the contact pathway is accessible across a range of customer needs and abilities. A strong score reflects a website where hardship assistance is easy to find and straightforward to access, regardless of how a customer navigates or what communication needs they bring.

HAI Category 2. Eligibility & Process - evaluates how readily the website gives customers a clear and accurate picture of their likely eligibility for hardship assistance, what applying involves, and what specific types of support (such as payment deferrals, term extensions or interest-only periods) may be available. A strong score reflects a website where customers are unlikely to self-exclude on the basis of uncertainty about whether they qualify.

27. The ADI segment in the HAI comprises ADIs that are not mutuals.

HAI Category 3. Communication & Tone - evaluates how effectively the language and tone of hardship content reduces the barriers a customer in financial difficulty faces when considering whether to reach out. A strong score reflects content that makes it easier for a customer under pressure to take that step.

HAI Category 4. Vulnerable Customer Care - evaluates the degree to which the website recognises that some customers are navigating particularly complex or difficult personal circumstances, and whether the content responds appropriately.



The category covers the broad range of vulnerabilities a customer may be carrying, including domestic and family violence, mental health, cognitive impairment, language and cultural barriers, financial abuse, addiction and serious illness, and compounding combinations of these.

HAI Category 5. External & Independent Help - evaluates how comprehensively and readily the website surfaces free, independent support pathways, including AFCA, the National Debt Helpline and financial counselling services, within or alongside the hardship content itself, where a customer in financial difficulty will encounter them, rather than only on a separate dispute-resolution or complaints page.

The categories are mutually reinforcing: a website may perform well on one category and still fail the customer if it falls short on another. Together, they describe the customer's path through hardship support, from discovery to action and onward referral where needed.

4.4 The scoring model

The HAI produces a score for each of the five categories and a single aggregate Hardship Accessibility Score reflecting overall performance. All scores are expressed on a scale of zero to ten, with one decimal place, where ten represents full achievement across all criteria.

Criteria within each category are weighted by their demonstrated influence on whether a customer in financial difficulty can find, understand and act on available support. Categories are weighted on a similar basis to reflect their relative importance to overall hardship communication. The weighting structure applies the Analytic Network Process, a multi-criteria approach that accounts for interdependencies between criteria when deriving weights.[28] To aid interpretation, lenders are classified into four performance bands.

Table 1. HAI performance bands

Band	HAI Score	Definition
Leading	8.5 - 10.0	Demonstrates comprehensive and effective hardship communication across all five categories, with performance that sets a standard for the sector.
Proficient	6.5 – 8.4	Demonstrates sound hardship communication with clear strengths, with targeted improvements available to further strengthen the overall picture.
Developing	4.0 – 6.4	Demonstrates rudimentary hardship communication with meaningful gaps.
Foundational	0.0 – 3.9	Hardship communication does not yet meet the standard customers in financial difficulty require, and material improvement is required across multiple areas.

4.5 Ongoing refresh

The HAI will be updated on an ongoing basis. Metric inclusion, weighting and categorisation will be reviewed, calibrated and refined, and lender scores will be refreshed as lender websites change. This whitepaper is based on data collected in March 2026, with the next scheduled refresh in October 2026.

4.6 Limitations

The HAI assesses lender website content. It does not assess the quality of human hardship interactions, the design of hardship processes behind the website, or outcomes for customers who engage with those processes. It also does not capture content delivered through authenticated platforms or apps, which a customer accesses only after identifying themselves to the lender. The HAI is therefore an assessment of the upstream, public-facing content layer. **The HAI shows what a customer encounters on the website. The lender's own performance data shows what happens after that. Neither view is complete without the other.**

28. T.L. Saaty, Decision Making with Dependence and Feedback: The Analytic Network Process (RWS Publications, 1996).

5. Findings

5.1 Performance against ASIC's four practical actions

Just under half of lenders meet all four of the practical actions ASIC set out for website content in REP 782. The remainder fall short on at least one.

Failure rates against the four actions individually are uneven. Publicising the availability of hardship assistance is the most consistently achieved (3 per cent failure rate). The other three actions are failed materially more often: 37 per cent of lenders do not feature hardship information prominently, 33 per cent do not encourage early contact, and 22 per cent do not make it clear that a hardship notice can be given at any time.

Table 2. Number of ASIC practical actions passed, all lenders

Practical actions passed	Share of lenders
All four	48%
Three	23%
Two	16%
One	11%
None	2%

Performance against ASIC's four practical actions varies by segment. Mutuals perform the best, followed closely by ADIs, with non-ADI lenders furthest behind.

Table 3. Performance against ASIC's four practical actions passed, by segment

Segment	Publicise Availability	Prominence	Anytime Notice	Early contact	All four
ADIs	100%	65%	90%	85%	50%
Mutuals	95%	71%	83%	76%	54%
Non-ADI lenders	98%	60%	72%	55%	30%
All lenders	97%	63%	78%	67%	48%

Non-ADI failure rates on anytime notice and early contact are approaching three times those of ADIs. Failure rates on prominence are similar across all segments.

5.2 Overall hardship accessibility scores

The mean overall HAI score across all 120 lenders is 5.7 out of 10.

Table 4. Overall HAI scores, by segment

Segment	Mean	Median	Performance band
ADIs	7.1	8.0	Proficient
Mutuals	6.1	6.3	Proficient to Developing
Non-ADI lenders	4.4	4.2	Developing to Foundational
All lenders	5.7	6.0	Developing

The strongest segment is ADIs, which score a mean of 7.1. Twenty-eight lenders, 23 per cent of those assessed, fall into the Foundational band and 71 per cent of those lenders are non-ADI lenders.

5.3 Category-level performance

The strongest categories across the industry are the categories most directly tied to information delivery: Eligibility & Process, Communication & Tone, and Prominence & Navigation. The weakest are the two categories most directly relevant to customers in particularly complex circumstances: Vulnerable Customer Care, and External & Independent Help.

Table 5. Category-level performance, all lenders

Segment	Industry mean	Industry median
Prominence & Navigation	6.1	6.3
Eligibility & Process	7.1	7.5
Communication & Tone	6.4	8.3
Vulnerable Customer Care	3.6	3.5
External & Independent Help	5.2	5.0

The two weakest categories are most directly relevant to the many customers who, on ASIC's findings in REP 782, are at increased risk of harm when seeking hardship assistance.[29] They are also the categories that connect customers to independent support beyond the lender itself, including AFCA, the National Debt Helpline and financial counselling services.

29. REP 782 at paragraph 15 and Section I (Supporting customers experiencing vulnerability) at pp 117–123.

The segment-level pattern follows the overall pattern, with the gap between non-ADI lenders and the rest of the industry widening sharply in Vulnerable Customer Care and External & Independent Help, and meaningfully in Prominence & Navigation.

Table 6: Category-level performance, by segment

Segment	ADI mean	Mutuals mean	Non-ADI mean	Industry mean
Prominence & Navigation	7.2	6.6	4.6	6.1
Eligibility & Process	8.3	7.0	6.8	7.1
Communication & Tone	7.0	6.9	5.5	6.4
Vulnerable Customer Care	5.7	4.1	1.9	3.6
External & Independent Help	7.3	5.7	3.3	5.2

ADIs are above the industry mean on every category. Mutuals are above the industry mean on every category except Eligibility & Process, where they sit slightly below. Non-ADI lenders sit below the industry mean on every category.

5.4 The compounding effect

The HAI categories are mutually reinforcing, and weaknesses in one category compound weaknesses in another. A lender that performs well on Prominence & Navigation but poorly on Communication & Tone brings the customer to the right page but presents content that may be perceived as unwelcoming. A lender that performs well on Eligibility & Process but poorly on External & Independent Help informs the customer of the lender's own process but does not signpost the independent support that would help them navigate it.

Lenders in the Foundational band tend to be weak across multiple categories rather than one. A customer arriving at such a website is likely to encounter hardship information that is hard to locate, difficult to interpret, missing the recognition that would prompt them to act on it, and disconnected from independent support. At each step, a portion of customers will disengage.

6. What the findings show

6.1 The customer's perspective is the starting point

Fifty-two per cent of lenders fall short on at least one of the four practical actions ASIC set out as a baseline for website content. Thirty-seven per cent do not feature hardship information prominently, and 33 per cent do not encourage customers to make contact early.

The practical action for every lender is to read its own hardship content as a customer in financial difficulty would. REP 782 sets out ASIC's practical actions and expectations. The HAI provides the empirical comparison against the rest of the industry. Together, they are the reference points against which a lender's own content can be assessed.

6.2 Two categories carry the highest stakes

The two weakest categories across the industry are Vulnerable Customer Care and External & Independent Help. These are also the categories most directly relevant to the many customers who, on ASIC's findings in REP 782, are at increased risk of harm when seeking hardship assistance.[30]

The data on Vulnerable Customer Care indicates that lender websites are not yet recognising the breadth of vulnerabilities a customer in financial difficulty may be carrying. The data on External & Independent Help indicates that free, independent supports (financial counselling, the National Debt Helpline, AFCA, and crisis and specialist services) are not surfaced where a customer in financial difficulty will encounter them.

The practical action is to prioritise content uplift in these two categories. The consequences of underperformance fall most heavily on the customers least equipped to advocate for themselves.

6.3 Customers are disengaging before they apply

The 35 per cent in-process dropout rate ASIC reported in REP 782 captures customers who had already engaged with the hardship process.[31] Some customers never give a hardship notice because their lender's website does not surface the help available to them. This is the invisible dropout. They are invisible to the lender, and absent from the data that lenders report.

Website content is not a proxy for hardship process quality. It is an upstream determinant of whether the hardship process is reached at all. For lenders whose internal hardship metrics are well-developed, reported in-process dropout rates will understate the true scale of unmet need, because the upstream cohort never appears in the data. **Low overall hardship application volumes may also reflect limited website visibility of hardship support, not low customer demand.**

The practical action is to treat website content as the first stage of the hardship pathway, and to invest accordingly. Across the three findings, one through-line holds: the lender's website is not a compliance surface but the first stage of the hardship pathway. Treating it that way is what the data calls for.

30. REP 782 at paragraph 15 and Section I (Supporting customers experiencing vulnerability) at pp 117–123.
31. REP 782 at paragraph 16.

7. Closing

7.1 What comes next

The Hardship Accessibility Index is an ongoing initiative. Humbli will publish updated scores in October 2026, following a further scan of lender websites. The methodology will continue to evolve as the regulatory and industry framework develops, and as good practice in hardship communication advances.

The findings in this paper show that website content is, for many lenders, a weak link in the hardship pathway. The customers most affected are those least equipped to advocate for themselves, and many are absent from the data lenders rely on to assess their performance. Closing that gap will require lenders to treat website content as a hardship-support function rather than a compliance or marketing-related task, and to read what they publish as a customer in financial difficulty would.

7.2 Engaging with Humbli

Lenders seeking to understand their individual HAI scores, their category-level performance, or the specific areas in which their website content can be reviewed and uplifted are invited to contact Humbli directly. Industry bodies, regulators and researchers interested in the methodology, the underlying data, or collaborative opportunities are similarly welcome to make contact.

Enquiries can be directed to:
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About the author

Vlad Cvetkovski joined Humbli in February 2026. Vlad is a lawyer with over 20 years' experience in financial services, spanning commercial and consumer credit across mortgages and asset finance. Most recently General Counsel at a non-bank lender, he was directly involved in the lender's response to ASIC's hardship review and the uplift of processes for supporting customers in financial difficulty. He holds a Bachelor of Business Administration, a Bachelor of Law and a Master of Insurance & Risk Management.

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Important information

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OUR VISION

A world where financial difficulty is addressed early, consistently, and fairly through trust in the financial system.

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