

Family Violence and General Insurance: Desktop audit of family violence policies, August 2021

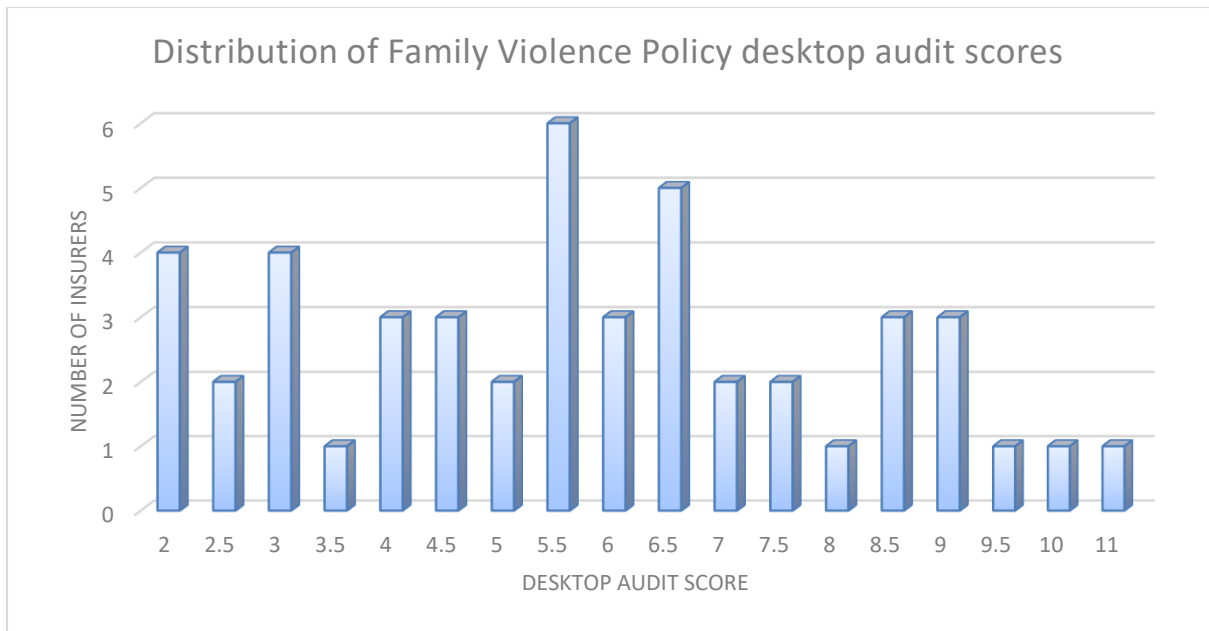
Introduction

The 2020 General Insurance Code of Practice (**the General Insurance Code**) introduced a requirement for insurers to have family violence policies available online for their customers. For many insurers this will be the first publicly available written policy indicating how they will support customers experiencing family violence. The Financial Rights Legal Centre (**Financial Rights**) saw this as an important opportunity to inquire into which insurers' written policies demonstrated best practice, and to benchmark all General Insurance Code subscribers in order to encourage ongoing improvements of their family violence policies.

It is important to note this exercise was only a desktop audit of insurers' written policies and not an assessment of a subscriber's compliance with, and implementation of, their own family violence policy, or an evaluation of a subscriber's culture of supporting customers experiencing family violence.

Key findings

- AssetInsure has the strongest family violence policy in the general insurance industry. Only AssetInsure achieved an 11 out of 11 score. The policy was found to have definitive language and specific measures that detail how they will help those subject to family violence.
- One insurer achieved a 10 out 11 score: Tokio Marine.
- One insurer achieved a 9.5 out of 11 score: Youi
- Three insurers achieved 9 out of 11: Aioi Nissay Dowa, Great Lakes, and MunichRe.
- Disappointingly a little over half the subscribers scored 5.5 out of 11 or less.
- Ten insurers scored less than 3 or less out of 11.
- Four insurers scored 2 out of 11: Mitsui Sumitomo, Hallmark, QBE Insurance (Australia) and QBE Lenders' Mortgage Insurance.



Full details of the desktop audit are at [Attachment A](#).

Best practice

We encourage all general insurers to learn from each other’s family violence policies and commit to introducing best practice family violence policies.

To achieve a best practice family violence policy, General Insurance Code subscribers should:

- adopt the approach of the AssetInsure policy which sets out why each of the 11 areas are important and puts specific measures in place to address each issue: see commentary under AssetInsure in [Appendix A](#); and
- in addition, include the following specific commitments found in other subscriber family violence policies that provide further protections for vulnerable consumers:
 - for safety reasons, include a large button to navigate quickly to another website: see the *Hollard* policy;
 - in relation to both protecting privacy and only making customers tell their story once, include a provision similar to the *Cover-More* policy:

“customer files, (such as policy documents and claims information) will be flagged as affected by family violence and will be accessible only to identified authorised employees”;
 - during claims handling, take the customer’s reasonable communication preferences into account. *Cover-More*, for example, includes a reference to gender preference which should be included in all policies:

“We can also take into consideration that your specific preferences in communicating with us for example, if you request to speak to a male/female employee whom you feel more comfortable in communicating with”.

- Include a link to the financial hardship application so your customer can apply for assistance straight away: see the *Guild Insurance* policy;
- When informing customers of the assistance that is available the family violence policy should include names of available external support resources *and* their contact numbers and email addresses for ease and quick access. *Hallmark General Insurance Company Limited* policy includes these details. Further, *Great Lakes Insurance SE - Munich Re* policy helpfully stipulates that a list of external services will be kept up-to-date;
- Reassure the customer that their family violence situation will not hurt their claim:

'Telling us about any situation of domestic and family violence will not negatively impact how we deal with you' – see Creditcorp Insurance Pty Limited policy
- Set out a complaints procedure for customers to lodge any complaints with respect to compliance with the family violence policy as the *AIG Australia Limited* policy sets out. Whilst this is not a requirement under the ICA's Guide to helping customers affected by family violence it represents best practice.

Additional recommendations

Changes to substantive policy wording

Financial Rights also recommends that all general insurers include a “conduct of others” clause that can go some way to addressing harms borne by the interaction of insurance exclusions and innocent victims of family violence. This occurs when a family violence perpetrator damages home building or home contents but the conduct, because it is by a family member, activates a policy exclusion.

For example, the clause introduced by *Suncorp* asserts that if the conduct of one policyholder has prejudiced another policyholder (e.g. through an act of domestic violence), the insurer may pay some or all of the claim where it is not legally required to do so.

Inclusion of key elements of the Guide in the General Insurance Code

As noted above, the research undertaken here is a desktop audit of written policies and is not an assessment of a subscriber's compliance with, and implementation of, their own family violence policy. To this end, we recommend that the key elements of the Family Violence Guide be included in the General Insurance Code in such a way that empowers the CGC to assess subscribers meeting the content expectations of a family violence policy and compliance with their commitments made under those policies.

We also recommend the ICA or the CGC maintain a central page providing links to each subscriber's family violence policy for ease of access.

Background

The 2020 General Insurance Code introduced new provisions requiring subscribers to have family violence policies available online for their customers by July 1 2020. This was prioritised to enhance awareness and understanding of how insurers will support customers experiencing family violence.

Paragraph 95 of the 2020 General Insurance Code commits all subscribers who provide retail insurance products to:

... have a publicly available policy about how we [the subscriber] will support you [the consumer] if you are affected by family violence. This policy will be published on our [the subscriber's] website.

Family violence is a reality faced by too many Australians. Perpetrators can undermine their victim's ability to access the benefits of insurance either unintentionally – as a by-product of their conduct - or intentionally – through the use of insurance as a tool to inflict further financial abuse. Perpetrators can, for example, take control of home or car insurances depriving their partner of insurance altogether, or preventing them from making a claim or receiving a payment. Perpetrators can also damage homes leaving innocent victims unable to claim due to exclusions under the policy. Survivors of family violence can also be treated poorly by insurance claims handling processes.

To support their subscribers, the Insurance Council of Australia developed a *Guide to helping customers affected by family violence* which sets out how insurers can identify and support people affected by family violence. This guide identifies 11 areas to be addressed by subscribers in a family violence policy.

Following the 1 July 2020 commencement, the General Insurance Code Governance Committee published an *Assessment of compliance with new provision on family violence policies*. This report assessed the websites of relevant subscribers and their brands to gauge their compliance with the requirement to publish family violence policies on their website and also to understand how each subscriber had approached this obligation.

This assessment generally found that:

- Of the 47 subscriber websites assessed, 45 (96%) complied with Paragraph 95 of the 2020 General Insurance Code and made their family violence policies publicly available on their websites.
- Two subscribers failed to comply, had Code breaches recorded, have since remedied the breach and now have family violence policies on their websites;
- Of the 36 brand websites owned by subscribers or their business partners, 33 (92%) had family violence policies available on their websites.
- Three brand websites either did not have a family violence policy on their website or had a policy buried so deeply on their website that it could not be found.
- Only a small number of subscribers and brands had policies that were considered 'easy to find' - 11 of the 47 subscribers (23%) and 4 of the 36 brands (11%).
- Most of the subscribers and brands fell into the 'meets minimum standard' category - 33 of the 47 subscribers (70%) and 29 of the 36 brands (81%).

While this assessment provided important insights into General Insurance Code subscriber compliance with the commitments, it did not examine the substantive content of the family violence policies.

Financial Rights believes it is important to examine not just the fact that a subscriber has a policy but also the quality of the policies developed and what protections and commitments were being made to customers who may be subject to family violence.

Financial Rights is also keen to assist all general insurers to learn from, and build upon each other's approaches in a positive and constructive manner to ensure that increased protections are applied all victims of family violence in a fair and equal manner.

Methodology

Financial Rights undertook a desktop audit of 47 General Insurance Code subscriber family violence policies. These policies were accessed from the websites in May 2021. The aim of the audit was to examine whether subscriber's family violence policies addressed the 11 areas listed in the ICA's *Guide to helping customers affected by family violence* to be included in a family violence policy. We also wanted to identify best practice commitments to customers and benchmark the 47 policies to measure future improvements. Clause 17 of guide states that:

Each insurer should develop and implement a family violence policy that covers the following areas:

- a. *make sure that safety is paramount for anyone affected by family violence*
- b. *early recognition of family violence*
- c. *training to improve employees' responses to someone affected by family violence*
- d. *protecting private and confidential information of customers affected by family violence*
- e. *minimising the number of times a customer affected by family violence needs to disclose information about family violence*
- f. *ensuring appropriate and sensitive claims handling processes for claimants affected by family violence*
- g. *ensuring collection arrangements are handled sensitively*
- h. *arranging access to Financial Hardship help*
- i. *informing customers, employees, distributors and service suppliers about information and assistance available to people experiencing family violence*
- j. *referring customers, employees and distributors to specialist services*
- k. *supporting employees and distributors who:*
 - (i) *are affected by family violence; or*
 - (ii) *experiencing vicarious trauma after serving affected customers.*

Policies were judged as to whether they addressed each of these areas comprehensively, partly addressed the area or did not address the area at all – scoring a 1, 0.5, or 0 respectively.

We subsequently developed a raw total score out of 11 for each family violence policy to assess the extent to which the policy meets the 11 areas outlined in the guide.

Despite this, we observed that for some family violence policies, the raw score did not adequately reflect the quality of the policy either as a whole or when compared against other policies. While we decided to remain focussed on raw scores for consistency's sake, we have nevertheless indicated in the desktop audit notes, where we believe an adjustment to the raw score (be it up or down) would be warranted, in order to provide a clearer indication to insurers of the quality of the policy when compared to others.

We further identified best practice clauses that made positive commitments to victims of family violence.

As noted above, this audit is not an assessment of a subscriber's compliance with, and implementation of, their own family violence policy, or an evaluation of a subscriber's culture of supporting customers experiencing family violence. We would also note that insurers do not have the same range of product offerings. Having a good policy on paper is possibly easier when you are less likely to be called on to act on it because you only offer a narrow range of products. While it is possible for family violence to impact on someone's travel insurance claim, for example, in our experience it is much more common with home and motor vehicle policies, and the stakes are likely to be higher for the insurer.

About Financial Rights

Financial Rights is a community legal centre that specialises in helping consumers understand and enforce their financial rights, especially low income and otherwise marginalised or vulnerable consumers. We provide free and independent financial counselling, legal advice and representation to individuals about a broad range of financial issues. Financial Rights operates the National Debt Helpline, which helps NSW consumers experiencing financial difficulties. We also operate the Mob Strong Debt Help services which assist Aboriginal and Torres Strait Islander Peoples with credit, debt and insurance matters.

Finally we operate the Insurance Law Service which provides advice nationally to consumers about insurance claims and debts to insurance companies. We have operated the Insurance Law Service since 2007 and the service has taken over 65,000 calls or emails for advice and finalised nearly 1400 case work files.

Over the last 14 years we have developed specialist expertise in consumer insurance disputes including issues relating to family and domestic violence.

Attachment A: Desktop audit of general insurance family violence policies, August 2021

Insurer	a. make sure that safety is paramount for anyone affected by family violence	b. early recognition of family violence	c. training to improve employees' responses to someone affected by family violence	d. protecting private and confidential information of customers affected by family violence	e. minimising the number of times a customer affected by family violence needs to disclose information about family violence	f. ensuring appropriate and sensitive claims handling processes for claimants affected by family violence	g. ensuring collection arrangements are handled sensitively	h. arranging access to Financial Hardship help	i. informing customers, employees, distributors and service suppliers about information and assistance available to people experiencing family violence	j. referring customers, employees and distributors to specialist services	k. supporting employees and distributors who: (i) are affected by family violence; or (ii) experiencing vicarious trauma after serving affected customers	Comment
1 <u>AAI Limited</u>	Yes. There is a statement to this effect.	Yes, partly. Whilst the policy notes that employees are encouraged to realise the importance of early detection of domestic and family violence issues with customers, it does not describe in detail how this is done in practice.	Yes. Mentions they will ensure employees are trained. Specifically outlines that if a customer informs them that they are affected by domestic and family violence, employees are trained to minimise retelling of situation, not requiring customer to make direct contact with alleged perpetrator, ensure that anyone visiting their home or site is trained and aware they may be in danger, be mindful that events that result in insurance claims can trigger violence, and be flexible in their approach to accommodate customer needs.	Yes. Policy notes precautions including finding a mutually appropriate time to talk on the phone, assessing whether it is safe to send text messages or leave voice messages, and sending information separately if the person is a joint policy holder.	Yes. Policy specifically indicates that employees are trained to minimise retelling of situation.	Yes. Employees, agents, partners, distributors and suppliers are trained to handle claims process with utmost care, prioritise safety by protecting sensitive, private and confidential information, referral to specialist services, and engaging customers with sensitivity, dignity, respect and compassion.	No. Does not detail collection arrangements.	No. Does not provide information on access to financial hardship support. While a Financial Hardship Policy is in place, there is no reference, cross reference or link to this in the family violence policy.	Yes. Policy provides a list of support services.	Yes. Policy provides a list of support services and also notes that employees, agents, partners, distributors and suppliers are trained to refer customers to specialist services.	Yes. Policy specifically sets out measures taken to protect employees affected by domestic and family violence. Family violence leave and support services are available to all employees.	8.5/11 Good policy that is easy to read and sets out majority of the information required by the Guidance.
2 <u>AI Insurance Holdings Pty Ltd</u>	Yes. There is a statement to this effect.	Yes, partly. Whilst the policy notes training to enable early recognition, it does not describe in detail how this is done in practice.	No. The policy does not outline the training provided to employees.	No. The policy has no information on this area.	No. The policy indicates they implement practices to minimise repeat disclosure but does not specify what these practices actually are.	No. The policy indicates that they ensure they handle claims appropriately and sensitively but does not actually specify how this is done.	No. The policy does not outline information on this area.	Yes, partly. Policy provides a contact number to enquire about financial hardship support but does not provide detailed information about what this support includes, eligibility for support etc. in the actual policy.	Yes. List of support services provided.	Yes. List of support services provided.	No. No information on this area.	4/11 Not a good policy as it merely provides commitment statements but does not actually outline steps taken by the business to address family violence. Customers are directed to contact their claims team for more information on the support services available. Given the sensitive nature of family violence, it would be better to

Attachment A: Desktop audit of general insurance family violence policies, August 2021

												have the information available to the customers than requiring them to have to speak with someone in order to access information.	
3	<u>AIG Australia Limited</u>	Yes. There is a statement to this effect.	No. Policy notes that when the business becomes aware of domestic and family violence, a staff member who has appropriate training will be able to assist. This does not specifically address early recognition.	Yes. Employees are trained to understand the warning signs and impacts of family violence. Policy does not detail any training with respect to specific procedures when responding to customers affected by family violence.	Yes, partly. Refers to Privacy Act and directs customer to their privacy policy. Also provides a statement that they will put in place mechanisms to avoid the disclosure of personal information, however, does not specifically outline what these mechanisms actually are.	Yes, partly. Policy states that the customer only has to explain their situation once, however does not indicate how this might occur in practice.	Yes. Policy states they will work with the customer and agree on the best way to communicate.	No. Policy does not mention collection arrangements.	Yes, partly. The policy contains a link directing to the Financial Hardship Assistance application. The policy itself does not outline what specific support is available.	Yes. Detailed list of services and organisations by state.	Yes. Detailed list of services and organisations by state.	Yes. Policy states that they have measures in place but does not outline what these measures are.	8.5/11* Sound policy as it addresses majority of the requirements of the guidance, however many areas contain general statements as opposed to information on specific measures in place. The policy sets out a complaints procedure for customers to lodge any complaints with respect to their family violence policy. Whilst not a requirement of the Guidance, this would be good to implement as best practice. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 6.5/11.
4	<u>Aioi Nissay Dowa Insurance Company Australia Pty Ltd</u>	Yes. There is a statement to this effect.	No. No information on this area.	Yes. All employees are trained on issues associated with family and domestic violence and the processes outlined in the policy. The Customer Support team is trained to communicate with customers to identify and assist with relevant support services, including financial assistance and	Yes. The business discusses safe ways to communicate with the customer and requires additional verification of identity for account to ensure they only disclose the personal information to the customer.	Yes. Only collect information that is necessary to further assess support required and once information is provided, will not ask to provide again.	Yes. Sets out specific measures in place for customers to communicate about their situation, including: no requirement to provide proof of family and domestic violence, safety flag alert system on the customer's account to alert employees that information provided is to be treated in a strictly private and confidential manner,	Yes. Support available includes review of collection activities where customer advises they are experiencing family or domestic violence.	Yes. Sets out in detail the measures available to customers who are experiencing financial hardship, including referral to financial counselling, consultation with customers on the suitable way to proceed, implementation of payment plans, paused payments, reduced payments for fixed periods, considering not to referral debt to third	Yes. Sets out services for women, men and LGBTI community. Policy also provides general resources on domestic violence as well as services for the perpetrator of domestic violence by recognising that they may require assistance to change their behaviour.	Yes - see (I).	No. No information on this area.	9/11* Very good policy that provides detailed information about specific measures in place. It is also structured well so it is easy to locate information. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 10/11.

Attachment A: Desktop audit of general insurance family violence policies, August 2021

			referral to expert networks.			additional verification requirements, staff not disclosing personal information to joint policy holder or other person unless instructed by customer.		party debt collection agencies, and ensuring personal and confidential information is not shared with a co-policy holder.					
5	<u>Allianz Australia Insurance Limited</u>	No. No statement to this effect.	No. No information on this area.	Yes, partly. Employees are trained, but the policy does not outline the specific training provided.	Yes. They will discuss safe ways to communicate with customers and record these. They will inform the customer about what information needs to be shared with other policy holders.	Yes. Policy states they will minimise the number of times the customer needs to disclose their situation by having dedicated employees specifically trained to assist customers experiencing family violence.	Yes. Specifically notes fast-tracking the claim, providing emergency payments or accommodation and/or reviewing decisions where there is ambiguity about cover.	No. Mentions stopping or deferring collection activities where family violence is occurring, however does not provide information on how collection arrangements are handled sensitively.	Yes. Where employee believes family violence is occurring, they may offer financial hardship assistance, including deferred payments or waiving excess.	Yes. Lists a number of support services and a brief description of their services.	Yes. Lists a number of support services and a brief description of their services.	No. No information.	6.5/11 Sound policy as it provides general statements about training to employees and support to customers facing family violence but does not specifically describe the measures in place to do so.
6	<u>Ansvar Insurance Limited</u>	No. No statement to this effect.	No. No information on this area.	No. No statement to this effect.	No. No statement to this effect.	Yes. Policy states this but does not outline how this is done in practice.	No. Vague statement that claims are handled with utmost care.	Yes. Discuss safe ways to communicate with the customer, including whether it is safe to send text messages or leave voice mails	Yes, partly. Provides general information about the availability of financial hardship support to people in vulnerable circumstances, but does not outline the process to apply or eligibility criteria etc.	No. Only includes one referral number but does not outline what the service provides.	No. Only includes one referral number but does not outline what the service provides.	No. No statement to this effect.	2.5/11 Poor policy as it only provides general information and does not address many areas required by the Guidance.
7	<u>Assetinsure Pty Limited</u>	Yes. Sets this out in objectives of policy.	Yes. Policy outlines the importance of early recognition. Policy specifically notes that after a major disaster, the business will consider whether they are sufficiently resourced to have appropriately experienced and qualified counsellors to go with claims employees to recovery centres to interact with customers affected by the event.	Yes. Specifically states employees and distributors have ongoing training so they are aware of policies and procedures, identify customers affected by FV, deal appropriately and sensitively with customers affected by FV, and apply the FV policy. Policy also indicates training provided to employees to help them identify signs that may indicate a customer is affected	Yes. Policy outlines specific measures taken by the business to protect private and confidential information, including only having email address accessible to employees and having physical address password protected. Customers affected by FV are flagged in the system. Ensuring any protection put in place applies across all policies the	Yes. Policy specifically sets out why it is important to minimise repeat disclosure and the measures in place to do so. For example, minimising the information the customer is required to provide, and where possible, ensure the customer deals with the same employee each time, work with the customer's agent or representative, if required, refer the customer to an interpreter to assist	Yes. Outlines the importance of sensitive claims handling and considerations of employees to ensure claims are handled with flexibility and care. Does not require evidence of intervention order to trigger requirements of FV policy. Employee will treat a customer as the policy requires if customer self-identifies as being affected by FV or the employee	Yes. Outlines the procedures in place to handle debt collection in a sensitive manner, including not referring the debt to third party collection agencies, or where debt has been referred, to repurchase the existing debt or take back referred debt.	Yes. Sets out assistance available to employees facing financial hardship. This includes, fast-tracking the financial hardship request, providing options for the customer to retain their policy if they cannot pay their premium, minimise the information and documents that customers are required to provide, and not require an intervention order as evidence of family violence.	Yes. States that the business will promote their family violence policy and financial hardship support policy.	Yes. Provides an extensive list of services available for family violence, financial advice, stress and mental health, life and crisis support, translation, and addiction.	Yes. Outlines support services provided to employees, including training, leave, additional security measures, and external referrals and counselling.	11/11 Very good policy as it is well-structured with headings to match the points required under the Guidance. The policy also sets out why each of the points are important and the specific measures in place by the business to address each issue.

Attachment A: Desktop audit of general insurance family violence policies, August 2021

			by FV and lists out examples. Training is tailored to employee or distributor's role within the business and the amount of contact they have with customers affected by FV. Policy lists out how training with help employees.	customer holds, by asking the customer if they have more than one policy or account that needs to be amended and proactively searching for other policies in the customer's name. Discussing safe ways to communicate with the customer and recording the plan on their file. Agreeing to requests from joint policyholders who ask for policy communication and information to be sent to two different addresses.	with communication.	identifies through the signs that the customer may be affected by FV.							
8	Auto & General Insurance Company Limited	No. No statement to this effect.	No. No information on this area.	Yes, partly. Mentions that employees have completed training but does not provide information about what employees are trained on.	Yes. Mentions additional measures to safeguard privacy but does not provide information about what these measures are.	No. No information on this area.	No. No assistance is provided in separating a joint policy, but other than that, the policy does not provide detailed information about how claims are handled.	No. No information on this area.	Yes. Mentions that fast-tracked review of financial hardship application is available, but does not provide details of the financial hardship application itself.	Yes. Provides list of services available.	Yes. Provides list of services available.	No. No information on this area.	4.5/11 Not a good policy as it contains general statements of commitment, but does not provide detailed information about the specific measures in place when dealing with clients facing family violence.
9	Berkshire Hathaway Speciality Insurance Company	Yes. There is a statement to this effect.	Yes. Employees are trained on early recognition, but policy does not detail how this is done in practice.	Yes. Policy outlines specifically what employees are trained on.	Yes, partly. Statement to this effect but does not detail how this is done in practice.	Yes. Statement to this effect but does not detail how this is done in practice.	Yes. Policy details that team members with adequate authority make decisions in family violence-related claims and where appropriate, allocating the same team member to be the primary person engaging with the customer.	Yes, partly. Statement to this effect but does not detail how this is done in practice.	Yes, partly. Statement that customers affected by family violence are informed of services available, but no information on what this assistance encompasses or the application process.	Yes, partly. Only provides details of one support service.	Yes, partly. Only provides details of one support service.	No. No information on this area.	7.5/11* Sound policy as it includes statements addressing the requirements of the Guidance, but does not actually provide information on how these are done in practice. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 7/11.
10	Catholic Church Insurance Limited	Yes. There is a statement to this effect.	Yes, partly. There is a statement to his effect but does not detail how	Yes. Employees are trained on how to identify signs of	Yes. Specifically outlines that CCI will communicate	Yes, partly. Mentions that CCI has systems and processes to limit	Yes. Claims are handled by the claims manager	Yes, partly. Mentions that where money is owed, CCI will	Yes. Assistance includes arranging more time for payment, setting	No. Policy only states CCI will provide	No. customers affected	Yes, partly. Statement that CCI will provide assistance to staff	7/11 Sound policy as it addresses majority of the requirements

Attachment A: Desktop audit of general insurance family violence policies, August 2021

		this is done in practice.	family violence, how to support affected customers and how to avoid harm to customers.	through by customer preferred communication. Also allows customer to ask a support person to contact CCI, advising that a letter of authority is required to do so. CCI does not require documentary evidence to access family violence assistance.	the need for repeated disclosure but does not specifically detail what these processes are.	responsible for the relevant product to ensure appropriate and sensitive claims handling process. Where there are joint policy holders and one person is experiencing family violence, CCI will confirm with them any request to cancel or change cover before actioning the request.	handle the matter sensitively, but does not detail how this is done in practice.	up instalment payment plans or alternative payment options, and referral to financial counselling services.	by family violence with information about external support services, but does not specifically provide a referral list.	Policy does not provide a list of specialist services.	affected by family violence but does not outline what specific assistance is provided.	in the Guidance. There are some areas that provide information about specific measures in place, whereas other areas only provide general information.
11 <u>Chubb Insurance Australia Limited</u>	Yes. There is a statement to this effect.	Yes, partly. Policy states early indicators may be apparent at time of a claim or after a major disaster event, but does not describe how they promote early recognition in practice.	Yes. Policy outlines what employees are trained in and lists signs that may indicate a customer affected by family violence. This includes legal requirements and internal processes if the customer and perpetrator are joint policyholders, including legal reporting requirements in relation to children, protecting details of employees when they have contact with perpetrator.	Yes. Policy provides detailed information on the specific measures taken, for example password protected physical address, asking for permission to record support or assistance required, treating all information as sensitive information, giving customers access to personal information held about them, asking a customer whether they have a policy or account that requires amendment due to a situation of family violence, discussing safe methods of communication, facilitating requests from joint policyholders who ask for communications to be sent to two different address.	No. Does not contain a statement to this effect nor measures in place to do so.	Yes. Policy outlines what employees must do to ensure appropriate and sensitive claims handling processes, including clearly and transparently explaining claims process, triaging the claim to a specialist or team leader, understanding a survivor of family violence may seem incoherent or may be difficult to contact and that the claims process itself can potentially trigger family violence.	No. Does not provide information on collection arrangements.	Yes. States that if a customer is affected by FV, procedures detailed in the Financial Hardship Policy must be adhered to. However, the customer needs to access and review a separate policy for details of this financial hardship support.	Yes. Provides list of support services with contact details.	Yes. Provides list of support services with contact details.	Yes. Specifically outlines the support services available to employees, including training, leave, additional security measures, and external referrals and counselling.	8.5/11 The family violence policy is contained within their broader 'Customers Experiencing Vulnerability & Family Violence Policy'. Overall, a good policy that provides detailed information about the processes in place to deal with customers experiencing family violence. The structure could be improved so that it is easier to read as it currently lists all the information as dot points without any sub-headings.
12 <u>Commonwealth Insurance Limited</u>	Yes. Blanket statement provided that CIL 'recognises' that the safety of customers is of paramount importance; however, no indication on how it	Yes, partly. Blanket statement provided, with no indication on how it will be implemented.	Yes, partly. No specific policy or procedures in place for training requirements - other than to state that CIL will ensure that its employees are provided the	Yes, partly. Blanket statement provided, with no indication on how it will be implemented. For example, no specific provisions regarding:	Yes, partly. Blanket statement provided, with no indication on how it will be implemented. For example, no specific provisions regarding:	Yes, partly. Blanket statement provided, with no indication on how it will be implemented. For example, no specific provisions regarding:	Yes, partly. It is stipulated that CIL will work with the third party to ensure the claim is 'handled sensitively'. No guideline provided on how this information will	Yes, partly. Policy advises that this information is available on the website and customers will be provided 'with information' on how to access assistance	Yes, partly. Employees and distributors' employees are given access to EAP. A manager hotline also is available for managers, team leaders and HR	No. Not specifically addressed in policy.	Yes, partly. Employees and distributors are given access to EAP.	5.5/11* The policy covers the Guidance but only in very broad terms. * Note: If we were to consider the policy as a whole and against other

Attachment A: Desktop audit of general insurance family violence policies, August 2021

	will be implemented or what specific procedures are in place.		'necessary training' - 'as relevant to their role'. No indication of what specific training will be provided.	<ul style="list-style-type: none"> ascertaining preferred method of communication record keeping of customer's preferred method of communication ability to offer alternative options of communication 	<ul style="list-style-type: none"> how people affected by family violence will be easily identified (.e recorded on screen); the potential for a specific claims officer to assist the customer, for continuity. 	<ul style="list-style-type: none"> how people affected by family violence will be easily identified - so as to avoid the victim having to repeatedly disclose their experience of family violence. 	<p>be 'sensitively' handled.</p> <p>No reference to:</p> <ul style="list-style-type: none"> time frames prior to referral to collection agency; communication with customer prior to referral (and whether this is required to be on a joint basis); whether the referral will be withdrawn on notification of financial violence. <p>No specific reference to ensuring that the collection agents are to comply with the 'Debt collection guideline: for collectors and creditors' published by ACC and ASIC.</p>	<p>through all customer channels.</p> <p>There is no reference in the policy as to:</p> <ul style="list-style-type: none"> how customers can fast track a request for financial help; available options (if any) to retain policy if unable to pay premiums; if customers can pause premium payments, without cancelling policy; whether access to financial hardship application is a joint or single application (ie does it require the consent of the other policy holder who may be the alleged perpetrator); whether the customer will be referred to the financial hardship team automatically - and how this referral will be dealt with sensitively. 	<p>support - no indication on what this 'manager hotline' covers.</p> <p>No reference to how customers will be provided assistance - other than reference to financial assistance guidelines.</p>		<p>policies, we would adjust the raw score to 5/11.</p>	
13 <u>Cover-More Insurance Services Pty Limited</u>	Yes. Staff are protected by ensuring that their identity is protected from any alleged perpetrator of family violence.	Yes. Policy stipulates that Cover-More does not require evidence to trigger the policy.	No. No specific reference as to what training will be provided, which employees will be trained and whether there is any refresher training.	Yes. Policy stipulates that, once informed of family violence (with no evidence required):	Yes. Policy stipulates that, once informed of family violence (with no evidence required):	Yes. Policy stipulates that:	No. No reference to collection agencies - presumably due to the nature of the insurance offered (travel insurance).	Yes. The Policy includes nation-wide contact details of resources for those affected by family violence. Policy stipulates that 'if you require', staff can connect customers with a financial counsellor, lawyer, community services or social worker, legal aid	Yes, partly. Policy stipulates that customers can be provided with information and referral services for counselling - presumably upon request (this is not stipulated). The Policy includes nation-wide contact details of resources	No. No reference in policy - presumably due to the nature of the insurance offered (travel insurance).	Yes, partly. There is reference in the policy to employees having 'support' when dealing with sensitive cases; however, no specific details as to the support is provided.	7/11 Sound policy, although a number of points are covered only in broad terms.

Attachment A: Desktop audit of general insurance family violence policies, August 2021

				<ul style="list-style-type: none"> joint policy holders; customer files will be flagged as affected by family violence; those customer files will only be accessible to identified authorised employees. <p>However, policy only appears to be implemented once the customer informs of family violence - rather than simply upon a suspicion from a claims manager who may have recognised the symptoms.</p>	<ul style="list-style-type: none"> as affected by FV; customer files will only be accessible to identified authorised employees; all policies will be flagged of the disclosure; where possible, consistency in speaking to same employee; and number of times the customer has to disclose the information will be minimised, noting they might not have access to records. 	<ul style="list-style-type: none"> or female employee; and note made on file as to the communication - ie specific times, if safe to leave phone message, and if email or phone is preferred. <p>No reference to ensuring that a specific employee/claims manager might be available for continuity.</p>	<ul style="list-style-type: none"> officer or family violence specialist. To clarify whether this is offered automatically or provided upon request. 	<ul style="list-style-type: none"> for those affected by family violence. Policy stipulates that 'if you require', staff can connect customers with a financial counsellor, lawyer, community services or social worker, legal aid officer or family violence specialist. To clarify whether this is offered automatically or provided upon request. There is reference to staff being provided with 'support' in handling sensitive matters; however, there is no indication on what this support is, how accessible it is, whether it is mandatory for those working on family violence policies (noting that there is reference to only specific authorised employees having access to customer files with family violence references). 				
14 <u>Credicorp Insurance Pty Limited</u>	Yes. Policy stipulates that customers will be queried as to their preferred method of communication and, once clarified, only that preferred mode an address will be utilised. No reference in policy as to how this preferred method will be recorded and whether it is recorded on file for each active policy. Policy stipulates that, if the customer is a joint policy holder, the customer's details	Yes, partly. No reference in policy on how staff recognise/suspect family violence situations. Rather, reference is only to customers who have actually disclosed family violence.	Yes, partly. Training is not compulsory - rather, there is reference to making it 'available' for team members and 'encourage' team members to undertake.	Yes, partly. Reference to taking 'reasonable steps' to ensure information is kept confidential; however, no information provided as to what 'steps' will be undertaken.	No. No reference in policy.	Yes, partly. Reference in Policy to ensuring team members respond 'appropriately' and 'sensitively'; however, to query how effective this is when training is not compulsory for employees. Specific reference in policy that advising of domestic and family violence will not negatively impact how Credicorp deals with the customer. This is a helpful line which could be included in other insurer policies.	No. No reference in policy.	No. Not specifically referred to in policy. However, there is reference to Credicorp notifying 'CUA', on request, of the circumstances for CUA to contact the customer to discuss support. It is unclear what 'support' is available.	No. Policy provides a support service line; however, this appears to be the generic insurance phone number and not one specifically for family violence. Not practical for potential time sensitive nature of calls. There is no other information provided on the policy as to what support services are available.	No. Not specifically referred to in policy. However, there is reference to Credicorp notifying 'CUA', on request, of the circumstances for CUA to contact the customer to discuss support. It is unclear what 'support' is available.	No. No reference in policy.	3/11 Poor policy, failing to address a lot of the Guidance.

Attachment A: Desktop audit of general insurance family violence policies, August 2021

	and claim details will be confidential from joint policy holder (alleged perpetrator).											
15 <u>Defence Service Homes Insurance Scheme</u>	<p>Yes.</p> <p>Policy stipulates that, if there is immediate or imminent threat to life, staff will call 000.</p> <p>Blanket reference to safety and wellbeing being first priority, with the approach to be adapted to the policyholder's needs and preferences.</p> <p>No specific details as to what safety policies and procedures are in place.</p>	<p>Yes, partly.</p> <p>Reference in policy to training to be provided to employees on how to identify vulnerable policyholders.</p>	<p>Yes.</p> <p>Reference to detailed training that is provided to employees, with reference to ensuring that policies and practices are regularly reviewed to ensure they are appropriate and flexible.</p> <p>No reference to when refresher training is provided to employees.</p> <p>No confirmation that all employees are provided training - not just those who may work in the call centre/claim's management role.</p>	<p>Yes, partly.</p> <p>Reference in policy to ensuring confidentiality of information; however, no specific reference to how this is dealt with for joint policy holders.</p>	<p>Yes.</p> <p>Policy stipulates that if policyholders are affected by family violence:</p> <ul style="list-style-type: none"> ■ the number of times information needs to be disclosed will be minimised; ■ policy holders will be 'triage[d]'. No specific reference to ensuring: ■ contact details will be kept secure and not shared with joint policy holders; ■ customer files will be flagged as affected by FV (with a note on all active policies); ■ ability for consistency in speaking to same employee; and ■ ability to choose gender of person to discuss claim with. 	<p>Yes, partly.</p> <p>Blanket sentence in policy to advise that 'timely, consistent and targeted assistance' will be provided.</p> <p>However, the only specific reference to implementing this is minimising the number of times a person needs to disclose family violence, provide same staff where possible and triage policyholders affected by family violence.</p>	<p>No.</p> <p>No reference in policy.</p>	<p>Yes.</p> <p>Policy provides, if required and 'agreed' (presumably by the policyholder), a referral to a financial counsellor or community support service may be made. This indicates that (pleasingly) the offer is provided to the policyholder - rather than waiting for a specific request from the policyholder.</p>	<p>Yes, partly.</p> <p>Policy includes contact details of three resources; however, only one specifically appears tailored to those affected by family violence.</p>	<p>No.</p> <p>No reference in policy.</p>	<p>Yes, partly.</p> <p>Generic reference in policy to supporting staff; however, no specific details are provided.</p>	<p>6.5/11*</p> <p>Sound policy although fails to cover some aspects of the Guidance and covers some aspects only in very broad terms.</p> <p>* Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 6/11.</p>
16 <u>Eric Insurance Limited</u>	<p>Yes, partly.</p> <p>Policy stipulates that, if staff are advised of a family violence situation, they will ask if it's safe to continue speaking or if there is an alternative contact number. However, there is no reference to record keeping of</p>	<p>No.</p> <p>No reference in policy. Presumably because of the requirement for policy holder to advise of situation - rather than staff specifically recognising possibility for family violence.</p>	<p>Yes, partly.</p> <p>There is a reference to training provided to staff on how to access services; however, it appears that there is no specific training for staff on how to recognise family violence.</p>	<p>Yes, partly.</p> <p>Policy has a blanket statement that information is confidential and a 'strict' process is in place. It is stipulated that personal information will not be disclosed to third parties, unless authorised.</p>	<p>No.</p> <p>Not addressed in policy. There is reference to the potential requirement to ask questions about circumstances or request supporting documentation.</p>	<p>No.</p> <p>There is no specific reference to ensuring:</p> <ul style="list-style-type: none"> ■ customer files will be flagged as affected by FV (with a note on all active policies); ■ ability for consistency in 	<p>No.</p> <p>No reference in policy.</p>	<p>No.</p> <p>There is reference to a 'Financial Hardship Policy' in place; however, this is not hyperlinked and there is no information on how to access the policy or its contents.</p>	<p>Yes.</p> <p>There are websites and contact phone numbers for eight organisations provided on the bottom of the policy, with three appearing to be specifically relevant to domestic and family violence.</p>	<p>No.</p> <p>No reference in policy.</p>	<p>No.</p> <p>No reference in policy.</p>	<p>2.5/11</p> <p>Poor policy that doesn't meet the requirements of the Guidance.</p>

Attachment A: Desktop audit of general insurance family violence policies, August 2021

	customer's preferred method of communication for future contact. There is no reference to ensuring safety of staff.			No reference to what policies are in place for joint policy holders. No reference to record keeping of customer's preferred method of communication.	There is no specific reference to ensuring: <ul style="list-style-type: none"> customer files will be flagged as affected by FV (with a note on all active policies); ability for consistency in speaking to same employee. 	speaking to same employee; ability to choose gender of person to discuss clam with. There is reference to ensuring that payments will only go to the policyholder or authorised nominee - a helpful inclusion.						
17 <u>Genworth Financial Mortgage Insurance Pty Limited</u>	Yes, partly. Policy stipulates that discussions to be had with consumer effected (or potentially effected) by family violence without notifying the perpetrator.	Yes, partly. There is reference to training provided to employees on how to potentially recognise those affected by family violence; however, no further details are provided.	Yes. All employees are provided training of the Policy and how to identify consumers potentially affected by family violence. Training is provided as part of new employee induction; however, there is no reference to any refresher training.	Yes, partly. Policy stipulates that personal information is not disclosed without express consent, even for joint accounts. There is reference to 'strict controls' for collection, storage, access and use of information for family violence or potential family violence; however, those 'strict controls' are not detailed.	Yes, partly. There is reference to the importance of this in the Policy; however, no actual details on how this will be effected/ implemented.	Yes, partly. There is reference in the policy to expectations for employees; however, no detail provided on how this is monitored.	Yes. If there is a situation of family violence, the matter will not be referred to a debt collection agency.	Yes. If there is a situation of family violence, the matter will not be referred to a debt collection agency.	Yes, partly. The policy provides names of nationwide and state wide support services; however, contact telephone numbers or email addresses are not provided. This may be preferred, for quick access for consumers who may require those services.	Yes, partly. Policy stipulates the expectation that staff know about contacts for local support services and local referral pathways.	No. No reference in policy.	6.5/11* Sound policy - covers most areas but some only in very broad terms. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 6/11.
18 <u>Great Lakes Insurance SE - Munich Re</u> <i>*NB: policy only applies to retail insurance products*</i>	Yes. Customers will be asked of the safe ways to communicate. There is reference to 'additional security measures' in place for employees; however, those measures are not specified - presumably for the safety of employees.	Yes, partly. There is reference in Policy to 'relevant' employees being provided training for early recognition. To clarify which employees are considered 'relevant' for training.	Yes but clarity required. Policy provides that employees 'in relevant positions' have ongoing training - to clarify which positions are considered 'relevant'. Detailed training specified in policy. Policy stipulates that 'The training of specialised employees will be considered if a female customer affected by family violence prefer to	Yes. Physical addresses will be password protected in system - to reduce risk of providing to someone who can answer alternative security questions. Possibility for only email addresses to be recorded in system. Information not disclosed for joint accounts.	Yes. A 'flag' will be placed in system for those affected by family violence, with permission of customer. To query the effectiveness of this, if customer is concerned about privacy/security? Where possible, the same employee will be available to discuss. Alternatively, the customer will be provided with a 'single pathway' to an appropriate team.	Yes. If customers require assistance from someone else - eg lawyer, interpreter, friend - they will accommodate this. Policy stipulates a goal to make processes 'flexible enough' to recognise authority of support person. To clarify how staff will confirm that person is a 'support person' and not the alleged perpetrator if contact is via telephone.	Yes. If there is a situation of family violence, the matter will not be referred to a debt collection agency.	Yes. Financial hardship requests will be fast tracked when family violence has been disclosed. Three options are provided for retaining the policy when a customer cannot meet premium payments. No requirement for co-insured to sign the financial hardship application. Amount of documentation	Yes, partly. Policy stipulates that this information will be available on website; however, no link provided. Employees will also provide this information to customers. A list of external services will be kept up to date and to a minimum - to make the referral choice simpler, with an alternative option available in case of lack of availability.	Yes. Policy stipulates that service suppliers are required to carry out the same training as staff before being in contact with potential victim of family violence.	Yes. Employees have training, leave, additional security measures, 'external referrals' and counselling available. There is also an EAP in place.	9/11 Good policy but requires clarity.

Attachment A: Desktop audit of general insurance family violence policies, August 2021

			<p><i>Speak to a female Employee'. To clarify this wording - is specialised training only offered to male staff?</i></p> <p>Staff will be trained as to legal reporting requirements in relation to children. This specific inclusion is quite helpful/ may be comforting.</p>	<p>Staff will ask and search for other policies that may be under customer's name, to flag family violence on that policy also.</p> <p>Staff will work with customer's agent or representative (e.g. lawyer, social worker etc.) if required - and make it 'as simple as possible' to appoint agent/representative, having regard to privacy obligations.</p>	<p>If customer discloses family violence, no evidence required for activation of policy.</p> <p>Reference to assorted considerations to ensure sensitive handling of claims.</p>	<p>required to provide will be 'minimised'.</p> <p>No need for evidence of family violence before a family hardship application will be considered.</p>	<p>The policy provides names of nationwide and state wide support services; however, contact telephone numbers or email addresses are not provided. This may be preferred, for quick access for consumers who may require those services.</p>					
19 <u>Guild Insurance Limited</u>	No. No specific details provided.	Yes, partly. Reference to staff being 'trained' to identify customers affected by family violence; however, no details are provided.	Yes, partly. Policy stipulates that training is provided to staff; however, no indication of what specific training will be provided, who it will be provided to and what refresher training (if any) is provided.	Yes, partly. Policy stipulates that 'extra care' will be taken to protect information; however, no details are provided.	Yes, partly. Policy stipulates that this will occur; however, no details are provided.	Yes, partly. Policy stipulates that claims will be handled with 'sensitivity, flexibility and care'; however, no details are provided.	Yes, partly. Policy stipulates that collection arrangements will be handled 'sensitivity'; however, no further details are provided.	Yes, partly. Policy stipulates that access to financial hardship help will be 'arranged as necessary'; however, no details are provided.	Yes, partly. Policy includes a link for two service providers and a telephone number for one. There is reference to contacting 'Legal Aid'; however, no contact details are provided.	No. Not provided for in policy.	No. Not provided for in policy.	4/11* Poor policy. Whilst most aspects of the Guidance are covered, it is only in very broad terms. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 3/11.
20 <u>Hallmark General Insurance Company Limited</u>	No. No reference in policy.	No. No reference in policy.	No. No reference in policy.	No. Policy stipulates that personal information is taken seriously and confidentially and directs customer to the Privacy Policy. There is no specific indication of what special measures (if any) are in place for customers affected by family violence.	No. No reference in policy.	No. No specific information provided.	No. No reference in policy.	Yes, partly. If customers experience financial difficulties, they will be referred to a 'specialist Hardship Team'. Ideally, it would be the same person or someone of the same team to minimise repetitive disclosure.	Yes. Telephone numbers and websites provided for three different support organisations, assorted legal aid centres, community legal centres and Centrelink.	Yes, partly. Reference to referring customers with financial difficulties to 'specialist Hardship Team'; however, not otherwise provided for in policy.	No. Not provided for in policy.	2/11 Poor policy failing to cover most aspects of the Guidance.
21 <u>Insurance Australia Limited</u>	Yes. There are statements saying this but the only practical step is that the policy says they will be 'referring them to emergency services if there is an immediate threat of harm'.	Yes, partly. The policy says that relevant employees will be trained to recognise the potential for future violence or vulnerability. However there are no specifics.	Yes, partly. The policy states that employees will be trained to recognise, understand how best support customers but very few specifics of what this training entails or how regularly it will occur.	Yes, partly. The policy states that the training for employees includes protecting private and confidential. However privacy is only mentioned in that one line, there are no specific plans	Yes, partly. The policy states that the training for employees includes minimising the number of times a customer needs to disclose. However privacy is only mentioned in that one line, there are no specific plans	No. Not addressed beyond stating that they will be 'flexible' and use 'flexibility and care'. There are no specifics however.	No. Barely mentioned, only that they will be 'understanding' of each customer's personal situation.	No. Barely mentioned, only that they will be 'understanding' of each customer's personal situation	Yes, partly. Employees will be trained to refer customers to emergency services or trusted external support providers 'if it is appropriate'. These support providers are 1800 RESPECT and Rape	Yes. Employees will be trained to refer customers to emergency services or trusted external support providers 'if it is appropriate'. These support providers are 1800 RESPECT and Rape	Yes, partly. Employees will receive EAP, external support and internal specialist team support if affected by Family Violence. They can also access sick, emergency or additional leave as well as flexible work.	5/11* The policy does not address the entire Guidance and is very brief in the way that it does. * Note: If we were to consider the policy as a whole and against other policies, we would

Attachment A: Desktop audit of general insurance family violence policies, August 2021

				or safeguards in the policy.	or safeguards. None of the suggestions at [35] of the <i>Guide to helping customers affected by family violence (Guide)</i> are included.				& Domestic Violence Services Australia.	& Domestic Violence Services Australia.	No mention of vicarious trauma.	adjust the raw score to 5.5/11.	
22	<u>Insurance Manufacturers of Australia Pty Limited</u>	Same as <u>Insurance Australia Limited</u>										Same as <u>Insurance Australia Limited</u>	
23	<u>LFI Group Pty Limited</u>	Yes.	No.	Yes, partly.	Yes, partly.	No.	Yes, partly.	No.	Yes.	No.	Yes, partly.	Yes, partly.	4.5/11*
		Mentioned, including reference to protection of important personal information such as location and contact information for those experiencing family violence.	Not mentioned.	No specific policy or procedures in place for training requirements - other than to say that staff will be trained to understand the issues facing those experiencing FV and equip them to refer to specialist support.	Mentioned with safety concerns, but is not separately specified or any explanation on how this is done. Specific mention of contact and location information being kept private and confidential, but not with any specific provision on how it is implemented. For example, no specific provisions regarding: <ul style="list-style-type: none">ascertaining preferred method of communicationrecord keeping of customer's preferred method of communicationability to offer alternative options of communication	Not mentioned. For example, lacking any specific provisions regarding: <ul style="list-style-type: none">how people affected by family violence will be easily identified (recorded on screen)the potential for a specific claims officer to assist the customer, for continuity	Mentioned, including adjusting requirements to prevent vulnerability being a disadvantage. No specific provisions regarding how people affected by family violence will be easily identified - so as to avoid the victim having to repeatedly disclose their experience of family violence.	Not mentioned. No guide provided on how information will be 'sensitively' handled. No reference to: <ul style="list-style-type: none">time frames prior to referral to collection agency;communication with customer prior to referral (and whether this is required to be on a joint basis)whether the referral will be revoked after notification of family violence. No specific reference to ensuring that the collection agents are to comply with the 'Debt collection guideline: for collectors and creditors' published by ACC and ASIC.	Mentioned, including proactive assistance to access financial hardship. However no specific detail how it is implemented. No reference as to: <ul style="list-style-type: none">how customers can fast track a request for financial help;what options (if any) are provided to customers to retain policy if unable to pay premiums;whether able to pause premium payments, without cancelling the policy;whether financial hardship application is joint or single application (ie whether consent of the other policy holder required);whether the customer will be referred to the financial hardship team automatically - and how this referral will be	Not specifically mentioned.	Mentioned verbatim but with no indication on implementation, strategies, or access	Mentioned verbatim, but with no indication of implementation, strategies or access	Poor policy without any practical information on how the policy works. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 2/11.

Attachment A: Desktop audit of general insurance family violence policies, August 2021

								dealt with sensitively.				
24 <u>Mitsui Sumitomo Insurance Co Limited</u>	No. Not mentioned.	No. Not mentioned.	No. Not mentioned	No. No more than a standard privacy disclosure For example, no specific provisions regarding: <ul style="list-style-type: none"> ascertaining preferred method of communication record keeping of customer's preferred method of communication ability to offer alternative options of communication. 	Yes, partly. Notes " <i>minimising how often you need to disclose your personal information</i> " No information on the specific implementation strategies or policies. Lacks any specific provisions on: <ul style="list-style-type: none"> how people affected by family violence will be easily identified (recorded on screen); the potential for a specific claims officer to assist the customer, for continuity. 	Yes, partly. Mentioned verbatim with no indication on implementation strategies or access. No specific provisions on how affected people will be easily identified, so as to avoid the repeated disclosure of their experience.	No. Not mentioned. No guideline on how information will be 'sensitively' handled. No reference to: <ul style="list-style-type: none"> time frames prior to referral to collection agency; communication with customer prior to referral (and whether required on a joint basis); whether the referral will be revoked after notification of financial violence. No specific reference to ensuring that the collection agents are to comply with the 'Debt collection guideline: for collectors and creditors' published by ACC and ASIC.	Yes, partly. Mentioned verbatim with no indication on implementation strategies or access No reference as to: <ul style="list-style-type: none"> how a request for financial help can be expedited; what options (if any) to retain policy if unable to pay premiums; whether premium payments can be paused without policy cancellation; whether application is a joint or single (ie does it need consent of the other policy holder); whether referral to the financial hardship team is automatic - and how this referral will be dealt with sensitively. 	No. Not mentioned.	Yes, partly. Mentioned, but no indication of the specific provisions, policies or strategies employed for this to be affected.	No. Not mentioned.	2/11* Poor policy that only covers a few aspects of the Guidance in very broad terms. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 1/11.
25 <u>Nib Travel Services Australia Pty Limited</u>	No. Not mentioned.	No. Simply states that employees 'play a role in first identifying that a customer is experiencing or perpetrating family violence' This is ambiguous and provides no specific information as to any strategies or policies in place.	Yes, partly. Referred to in Clause 1.1 and is the subject of Clause 2, but there is no specific reference to how the training is undertaken.	No. No more than a standard privacy disclosure. For example, no specific provisions regarding: <ul style="list-style-type: none"> ascertaining preferred method of communication; record keeping of customer's preferred method of communication; 	Yes, partly. The policy states that the same case manager, wherever possible, will be the contact - presumably to prevent additional disclosure, however it is not spelled out, as an explanation or justification.	Yes. Clause 3 describes this process, and notes that policies have been developed. The process is spelled out clearly and simply	Yes, partly. It is mentioned but not specifics provided. No reference to time frames, communicates, and whether referral will be withdrawn on notice of family violence. No specific reference to ensuring that the collection agents are to comply with the	Yes. Clause 4, including a fast-track process where needed.	Yes, partly. Clause 5 refers to the EAP. Clause 2 refers to training for all employees and service providers but does not specify that customers and distributors will be provided with information and assistance.	Yes. Clause 5 goes to this in broad terms but does not specify that a reference to either (i) or (ii).	Yes, partly. Clause 5 goes to this in broad terms but does not specify that a reference to either (i) or (ii).	5.5/11* Whilst a more lengthy policy, it does not cover all aspects of the Guidance. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 4.5/11.

Attachment A: Desktop audit of general insurance family violence policies, August 2021

							- ability to offer alternative options of communication.	'Debt collection guideline: for collectors and creditors' published by ACC and ASIC.					
26 <u>NTI Limited</u>	Yes, partly. Mentioned together with (b) and (c) but not separately dealt with or including any specific provisions on how this is achieved.	Yes, partly. Mentioned together with (a) and (c), but not separately dealt with or including any specific provisions on how this is achieved.	Yes, partly. Mentioned together with (a) and (b) but not separately dealt with or including any specific provisions on how this is achieved.	Yes, partly. Mentioned verbatim but no indication on implementation strategies or access No specific provisions on ascertaining preferred method of contact, record keeping, or alternative options of communication.	Yes, partly. Mentioned verbatim but no indication on implementation strategies or access Does not address how affected people will be easily identified (recorded on screen), or the potential for the same claims officer to assist the customer.	Yes, partly. Mentioned verbatim but no indication on implementation, strategies or access No specific provisions on affected people will be easily identified to avoid the victim having to repeatedly disclose their experience.	Yes, partly. Mentioned verbatim but no indication on implementation strategies or access No guideline on how information will be 'sensitively' handled. No reference to time frames prior to referral to collection agency; notice to customer prior to referral, or whether referral will be withdrawn after notification of financial violence. No specific reference to ensuring collection agents to comply with the 'Debt collection guideline: for collectors and creditors' published by ACC and ASIC.	Yes, partly. Mentioned verbatim but no indication on implementation strategies or access No reference as to how to fast track application for financial assistance, options (if any) available to retain policy if unable to pay premiums; or whether premium payments can be paused, whether the application is done jointly with other policy holder, or whether the referral to the financial hardship team will happen automatically.	Yes, partly. Mentioned verbatim but no indication on implementation strategies or access	Yes, partly. Mentioned verbatim but no indication on implementation strategies or access	Yes, partly. Mentioned verbatim but no indication on implementation strategies or access	6/11*	Poor policy that refers to the Guidance in only very broad terms with no specifics provided. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 2/11.
27 <u>Open Insurance Pty Ltd</u>	Yes. It is not on the Open Insurance website - it refers you to www.holland.com.au/about/social-responsibility/domestic-family-violence.aspx which states 'Whenever family violence is identified or suspected, our priority is the safety of the person affected by family violence and the protection of their family. We will strive for the early recognition of family violence.'	Yes. It is not on the Open Insurance website - it refers you to www.holland.com.au/about/social-responsibility/domestic-family-violence.aspx which states they will 'strive for the early recognition of family violence.'	Yes, partly. It is not on the Open Insurance website - it refers you to www.holland.com.au/about/social-responsibility/domestic-family-violence.aspx which states that training will be provided to all employees and distributors but does not provide specifics on that training.	Yes, partly. It is not on the Open Insurance website - it refers you to www.holland.com.au/about/social-responsibility/domestic-family-violence.aspx which states that they will do so through the 'processes in place to secure the information.' It does not provide any specifics on the processes.	Yes, partly. It is not on the Open Insurance website - it refers you to www.holland.com.au/about/social-responsibility/domestic-family-violence.aspx which refers to this requirement but provides no specifics.	Yes, partly. It is not on the Open Insurance website - it refers you to www.holland.com.au/about/social-responsibility/domestic-family-violence.aspx which refers to this requirement but provides no specifics.	Yes, partly. It is not on the Open Insurance website - it refers you to www.holland.com.au/about/social-responsibility/domestic-family-violence.aspx which refers to this in very general terms.	Yes, partly. It is not on the Open Insurance website - it refers you to www.holland.com.au/about/social-responsibility/domestic-family-violence.aspx which refers to this in very general terms.	Yes, partly. It is not on the Open Insurance website - it refers you to www.holland.com.au/about/social-responsibility/domestic-family-violence.aspx which refers to this in very general terms.	Yes, partly. It is not on the Open Insurance website - it refers you to www.holland.com.au/about/social-responsibility/domestic-family-violence.aspx which refers to this in very general terms.	Yes, partly. It is not on the Open Insurance website - it refers you to www.holland.com.au/about/social-responsibility/domestic-family-violence.aspx which refers to this in very general terms.	6.5/11*	Whilst the policy addresses every aspect of the Guidance, it is only in very general terms. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 3/11.
28 <u>PD Insurance Agency Pty Ltd</u>	Yes. Mentioned but with no specifics about	Yes, partly. Mentioned training to be provided but	Yes, partly. Mentioned training is to be provided, but	No. No specific mention.	Yes, partly. Mentioned 'implementing	Yes, partly. Mentioned 'implementing	Yes, partly. Says that it will be handled in a manner	Yes, partly. Mentioned verbatim but no indication on	Yes, partly. Mentioned vaguely with (j) but no	Yes, partly. Mentioned vaguely with (i) but no	Yes, partly. Mentioned specifically to	5.5/11*	Poor policy, generally referring

Attachment A: Desktop audit of general insurance family violence policies, August 2021

	how it is actually enacted	no reference on what training, time frame or procedures in place.	no specifics on what training, time frame or procedures in place.		<i>practices</i> to achieve this but no specifics provided.	Mentioned, but no specifics about the enactment of policy. No specific provisions on how people affected will be identified to avoid the victim having to repeatedly disclose experience of family violence.	<i>'appropriate and sensitive to the needs of affected customers'</i> . No reference to time frames prior to referral to collection agency, notice to customer prior to referral, or whether referral will be withdrawn after notification of financial violence. No reference to ensuring agents comply with <i>'Debt collection guideline: for collectors and creditors'</i> published by ACC and ASIC.	implementation strategies or access No reference as to how customers can fast track a request; options available (if any) if unable to pay premium; whether premium payments can be suspended; how to make an application; and whether referral to financial hardship team is automatic.	specifics on what information or referrals are actually available.	specifics on what referrals are available or how they are managed or implemented.	include (ii), but no mention of (i)	to most aspects of the Guidance without any specifics. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 4.5/11.
29 <u>Petsure (Australia) Pty Ltd</u>	Yes. Mentioned verbatim, but no specifics on how it is achieved or what provisions are actually in place.	Yes, partly. Mentioned as something <i>'strived for'</i> but no specific provision on how it is actually achieved or implemented.	Yes, partly. Mentioned specifically so that employees identify appropriately and sensitively with customers. No reference on what training, time frame or procedures in place.	Yes, partly. Mentioned, including that a request for support is made under the same privacy standard and that alternative arrangements (lawyers/ support organisations) can be included without forfeiting right to privacy. No specific provisions regarding methods of communication available, ascertaining preferred method of communication, recordkeeping.	Yes, partly. Mentioned verbatim but no indication on implementation strategies or access No information on implementation strategies or policies. Does not address how people affected will be easily identified (recorded on screen) or whether a specific claims officer will be assigned.	Yes. Mentioned, including that training is provided and that alternative arrangements can be made. No specific provisions on: how people affected by family violence will be easily identified - so as to avoid the victim having to repeatedly disclose their experience of family violence	No. Not mentioned.	Yes, partly. Mentioned including reference to assistance and support. There is no reference in the policy as to how a financial hardship request can be expedited, ability to retain policy if unable to meet premiums, whether premiums can be suspended, whether access to the financial hardship application is on a unilateral or joint basis, or whether referral to the financial hardship team is automatic.	Yes. Mentioned including specific extension of information to providers and partners.	Yes. Mentioned specifically, for employees and brand partners and customers.	Yes. Specifically mentioned both (i) and (ii).	7.5/11* Sound policy although more information on how their policy will be delivered is required. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 7/11.
30 <u>QBE Insurance (Australia) Limited</u>	No. Not mentioned.	No. Not mentioned.	No. Not mentioned.	No. Not mentioned separately from a general privacy statement. No specific provisions.	Yes, partly. Mentioned briefly, but in the context of "How can we help" with no specifics as to the actual implementation.	Yes, partly. Mentioned verbatim in the "How can we help" section. No specific provisions.	No. Not mentioned specifically.	Yes, partly. Specific mention of Financial Hardship, including instruction to speak to a claims officer or follow a link on the page to allow for immediate and easy implementation.	No. Not mentioned.	Yes, partly. Mention of referring customers to specialist services.	No. Not mentioned.	2/11* Poor policy addressing only a few aspects of the Guidance although in very general terms. * Note: If we were to consider the policy as a whole and against other

Attachment A: Desktop audit of general insurance family violence policies, August 2021

													policies, we would adjust the raw score to 1.5/11.
31 <u>QBE Lenders' Mortgage Insurance Ltd</u>	See <u>QBE Insurance (Australia) Limited</u>												See <u>QBE Insurance (Australia) Limited</u>
32 <u>RAA Insurance Pty Ltd</u>	No. Not specifically mentioned.	No. Not mentioned.	Yes, partly. Mentioned internal procedures, processes and training to help employees support customers experiencing FV, but no clear explanation as to the time frame, subject or implementation of that training.	No. Mention of the general privacy policy only.	No. Not specifically mentioned.	Yes. Mentioned, including that support people can be provided, that identification requirements can be altered as needed, and that there can be external referrals.	No. Not mentioned.	Yes, partly. Mentions case by case additional support but no reference as to fast tracking request for financial help, options if unable to meet premiums etc.	No. Not specifically mentioned.	Yes. Mention of referring customers to external legal or support organisations.	No. Not mentioned.	3/11* The policy is in quite general terms but there is further information on their website. It would be better that the information is centralised. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 4/11.	
33 <u>RAC Insurance Pty Ltd</u>	Yes.	No. Not mentioned.	Yes. Mention of internal procedures and training to help employees support vulnerable customers but no clear explanation as to the time frame, subject or implementation of that training.	Yes, partly. Mention that access to information is only to staff who need to know, and all effort taken to prevent disclosure of sensitive information, and "systems" in place to protect personal information. No further specifics.	Yes, partly. Specific mention that there are steps in place and to determine the best approach on a case by case basis.	Yes, partly. This is mentioned, including the fact that there are systems if there is a joint policy.	No. Not mentioned.	Yes, partly. Says Financial Hardship can be fast tracked. No other specifics regards options surrounding premium payments etc.	No. Not specifically mentioned.	Yes, partly. Referrals for customers, but no specific mention for employees and distributors.	No. Not mentioned.	4.5/11* The policy is in quite general terms but there is further information on their website. It would be better that the information is centralised. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 4/11.	
34 <u>RACQ Insurance Limited</u>	Yes.	Yes. Mentioned that specialised training to recognise the signs has been deployed.	Yes. Mentioned that there is specialised training for staff to support customers, and recognising vulnerable circumstances, including escalation to a specialised support team.	No. Nothing specific beyond general privacy statement.	No. Not specifically mentioned.	Yes, partly. Commitment to sensitive and compassionate support. No key specifics on what the commitment entails, or how it is practiced.	No. Not mentioned specifically.	Yes. Clearly outlined how to access Financial Hardship, including links and phone numbers, and commitment to extra support.	No. Not specifically mentioned	Yes, partly. Referrals available on the website of the policy, but no specific mention for employees and distributors.	No. Not mentioned.	5/11* The financial hardship information is very good but otherwise the policy is in very general terms. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 5.5/11.	
35 <u>RACT Insurance Pty Ltd</u>	Yes.	Yes, partly.	Yes, partly.	Yes, partly.	Yes, partly.	Yes, partly.	Yes.	Yes.	Yes.	Yes, partly.	Yes.	8/11	

Attachment A: Desktop audit of general insurance family violence policies, August 2021

	Third party service suppliers acting on RACT's behalf will be advised if there is a possibility for danger - e.g. assessors and tradespeople. No requirement for customer to report perpetrator to police before claim can be accessed.	Reference to employees having training to identify customers affected by family violence. No other specific details provided.	Policy stipulates that 'customer facing staff' have been provided with assorted training. It is unclear whether any refresher training is provided. Anyone acting on behalf of RACT will be trained under standards of the 'Code' - does not stipulate which 'Code'.	Contracts in place with service providers to protect personal information. Policy information will still be available to co-insured, if there is a joint policy. Specific arrangements can be made for the provision of documents, depending on customer's preference.	Policy stipulates that this will occur; however, no details are provided.	Additional time to be provided for insureds to respond to requests. No other specific practices/policies in place.	Customers affected by family violence will not be referred to debt collection services.	Application only requires consent from one policy holder; however, this protection seems futile as joint policy holder can still query information from account.	Contact phone numbers for support services, including for children and Indigenous.	No specific reference to referrals; however, contact details are provided for support services.	During major disasters counsellors are available to assist employees. Employees also provided counselling, flexible work arrangements and time off work.	Good policy but lack of privacy surrounding policy needs clarity, ie what details will be available to co-insured as this may totally undermine the policy.
36 <u>Southern Cross Benefits Limited t/a Southern Cross Travel Insurance</u>	Yes, partly. This is mentioned but it is a lacking policy overall, it is just a small section of webpage. https://www.scti.com.au/help-support/vulnerable-customers	No. Not addressed.	Yes, partly. Mentioned that employees are trained to recognise family violence and to understand that safety is paramount for anyone affected by it.	Yes, partly. It is mentioned that they protect private and confidential information of those affected.	Yes, partly. Whilst mentioned, no specifics are provided.	Yes, partly. Whilst mentioned, no specifics are provided.	No. Not addressed.	No. Not addressed	Yes. The names and numbers of multiple relevant information providers.	Yes, partly. The website has the names of several specialist services but no referral process is mentioned.	No. Not addressed.	4/11* Poor policy. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 1/11.
37 <u>Swiss Re International SE</u>	Yes.	Yes, partly. It is said that employees are trained to be able to identify early and appropriately assist and support customers.	Yes, partly. They say there is 'relevant and regular' training to both staff and service suppliers covering the relevant areas of the code guidance.	Yes, partly. They say they do this but no specifics.	Yes, partly. They say they do this but no specifics	Yes, partly. They say they do this but no specifics	Yes, partly. They say they do this but no specifics	Yes, partly. They say they do this but no specifics	Yes, partly. They say they do this but no specifics	Yes, partly. They say they do this but no specifics	Yes, partly. They say they do this but no specifics	6/11* The policy covers the different aspects of the Guidance but only in general terms. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 5.5/11.
38 <u>The Hollard Insurance Company Pty Ltd</u>	Yes. Explicit and expanded to whenever family violence is 'identified or suspected'. The website policy has a large clickable button that instantly takes a reader to another website, in case they need to	Yes, partly. They 'strive' for early recognition, but no specifics.	Yes, partly. States that they will train employees and distributors in the relevant areas, no timelines or details though.	Yes, partly. Mentioned but no details.	Yes, partly. Mentioned but no details.	Yes, partly. Mentioned but no details.	Yes, partly. Say they will 'adopt a different process and consider the risk', but no details.	Yes, partly. Mentioned, and say they will include family violence circumstances in their internal financial hardship guidelines.	Yes, partly. Mentioned but no details.	Yes, partly. Mentioned but no details.	Yes, partly. Mentioned but no details.	6/11* The policy covers the different aspects of the Guidance but only in general terms. The link to a different website is one that should be adopted by all online policies. * Note: If we were to consider the policy

Attachment A: Desktop audit of general insurance family violence policies, August 2021

	quickly exit the page (such as if a perpetrator walks in).											as a whole and against other policies, we would adjust the raw score to 6.5/11.	
39	The Tokio Marine & Nichido Fire Insurance Co Ltd	Yes, partly. Not mentioned explicitly, but this is otherwise quite a strong policy.	Yes. Comprehensively notes warning signs of family violence and says that employees and distributors need to be aware of these.	Yes, partly. There is an extensive list of helpful training topics relating to family violence. However there are little details about how this training is delivered, just that it is 'ongoing'.	Yes. They protect the information. They also have a 'flagging' system which alerts employees that a customer may be affected by family violence. They also: <ul style="list-style-type: none"> apply protections across all a customer's policies; give customers control over how their information is shared; discuss and record how a customer prefers to be contacted. Understand legal reporting requirement for children.	Yes. They acknowledge the issue and will try to enable the customer to consistently deal with the same employee or have one pathway to the appropriately trained team. They will not charge customers for copies of documents. They will also work with customer's agents or representatives.	Yes. They consider a wide range of factors in order to handle the claim with 'flexibility and care'. These factors include: <ul style="list-style-type: none"> having specialist employees and distributors; clearly and transparently explaining processes to customers; being aware inconsistent and lack of communication does not mean claims are fraudulent, invalid or given up on; making sure any employee interviewing a customer may be in danger and must be appropriately trained under the Guidance; and any payment is made to the appropriate party. 	Yes. They will not refer the customer or sell the debt to debt collection agencies. If it already has been sold or referred, they will work with the collection agency to provide the best outcome for the customer. They may repurchase the debt or take back a referral.	Yes. If a customer identifies as being affected by family violence then the employee or distributor asks about the customer's financial situation to determine if they are experiencing financial hardship. If so they: <ul style="list-style-type: none"> fast track the financial hardship request; provide options for the customer to retain policies, even if they cannot pay premiums (including changing policy, or pausing payments); ensuring joint policyholders are handled appropriately, such as considering applications without the consent of both holders (and being aware reluctance to get consent could be a warning sign); minimise the amount of documents required by customers; not requiring evidence of family 	Yes. They inform customers of the recognised external specialist services in each state as well as the Australia-wide services. They also provide the policy on request.	Yes. They keep an up to date list of recognised external specialist services, push this list on their website and have employees and distributors provide this to customers.	Yes. Recognises these issues and offers training, leave, additional security measures, external referrals and counselling. They also 'manage' known perpetrators of violence.	10/11 Very good policy addressing in detail most aspects of the Guidance.

Attachment A: Desktop audit of general insurance family violence policies, August 2021

									violence; automatically referring customers to the appropriate team.				
40 <u>Virginia Surety Company, Inc</u>	Yes, stated.	Yes, partly. They 'strive' for early recognition, but no specifics.	Yes, partly. Mentioned but no details.	Yes, partly. Mentioned but no details.	Yes, partly. Mentioned but no details.	Yes, partly. Mentioned that when engage with vulnerable customers, they may arrange additional support such as referring the customer to people or services with specialist training and experience.	No. Not addressed	Yes, partly. Mentioned but no details.	Yes, partly. Mentioned but no details.	Yes, partly. Mentioned but no details.	Yes, partly. Employees can access EAP and 'appropriate work arrangements'.	5.5/11*	Addresses most aspects of the Guidance but only in very general terms. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 5/11.
41 <u>Westpac General Insurance Limited</u>	Yes. Protecting customers' safety is the first principle of the policy.	No. Not addressed.	Yes, partly. Mentioned that employees will be trained to work effectively with customers in family violence situations. This training will 'meet or exceed' what is required by the Guidance.	Yes. Westpac will agree with the employee the safest and most appropriate way of communicating. Westpac can set up a separate transaction account that can only be viewed by the account holder. Westpac may recommend that the customer open an account with a different Westpac brand, or another bank. Westpac can change their online banking details.	Yes, partly. Mentioned that they will minimise the number of times customers need to disclose, but no specifics.	Yes, partly. Westpac has processes for protecting customers' financial assets, including freezing withdrawals (though this notifies all account holders. This procedure could potentially be used against the person experiencing family violence though. Can fast track insurance claim and make emergency payments. Can assist customers to access limited financial and other support to keep them and their family safe, including emergency overdraft or low interest loans. Can also make referrals to other banks. Overall, these procedures seem quite general and not particularly helpful.	Yes, partly. They can review debt for a customer, and encourage them to seek independent legal and financial advice. Though they might be required to notify a joint account holder of any alternative payment plan proposed.	Yes, partly. Mentioned, but no details.	No. Referrals and information can be provided on request.	Yes, partly. Mentioned that they make referrals to counselling services or specialist family violence services.	No. Not addressed.	5/11*	Whilst various aspects of the Guidance are addressed, the safety and security in the policy is questionable. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 3/11.
42 <u>Youi Pty Ltd</u>	Somewhat.	Yes, partly.	Yes.	Yes.	Yes.	Yes.	Yes.	Yes.	Yes, partly.	Yes.	Yes.	9.5/11*	

Attachment A: Desktop audit of general insurance family violence policies, August 2021

	Not explicitly, except for a mention that they understand safety is paramount when assisting clients at risk or harm and that employees or service providers who believe a person is in immediate danger should refer the matter to the police.	The policy notes warning signs for customers and employees.	Policy is on Youi's external website. All employees are made aware of the policy in induction. Mandatory awareness training. Designated domestic violence responders, who complete specialist training. Managers are trained on how to recognise and conduct conversations around family violence as well as where to direct employees.	Employees should check that information is sent in a safe way. They will also check that all contact information on the account is accurate, to confirm that the abuser's information is not listed. They will discuss options with clients about additional steps. Ensure the client knows who is authorised on the policy and offers to remove an authorised representative.	Clients are flagged as being case managed, and always referred to the Priority Assistance Team.	Clients are referred to the Priority Assistance Team. Policy premium pricing can be discussed if an increase is due to the violent actions of another. Can review rejections and tenancy vacation decisions. Flexibility around documentation. Employees must check how clients wish to proceed.	Cash settlements of a claim can be arranged. Arrangements are 'established' with debt collection agencies so if they become aware of family violence, they must inform Youi.	Mentioned that they have access to them. Hardship policies can be applied 'flexibly' and fast tracked.	Employees and suppliers are made aware of the policy, and referral organisations.	The policy states that employees are to refer clients who make disclosure to specialists.	States that employees can make a disclosure of family violence to their direct manager, 'ExCo member' or human resources'. However it only says that 'procedures must be in place without specifying what these are. Zero tolerance workplace, including for offensive jokes and behaviour. Whistleblower Policy in place. Assurance of no adverse action for employees. Understanding and reviews for an employee whose work is impacted by family violence. Employees can take leave, including 'family and domestic violence leave'; request flexible working arrangements or access EAP. Also having Courts list the workplace included in a DVO. Role adjustments or supports, such as change to working hours or patterns of work. No mention of vicarious trauma.	A very good policy that addresses all areas of the Guidance in detail. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 9/11.
43 Zurich Australia Insurance Limited	Yes. Not explicitly mentioned, but they do not require any evidence. A customer self-identifying is enough. Also, they take a wide definition of family violence:	No. Not addressed.	Yes, partly. States that training is provided to all staff.	Yes, partly. Yes, they say they do this. They also claim to engage with the customer to discuss safe ways to communicate, they will note the customers preferences on the file.	Yes. They also note that customers may not always have access to their personal information, records and documents. They will also try to ensure that customers consistently speak to one staff member, or have a single	Yes, partly. They state that they will 'take additional care' and provide 'additional support and assistance', but this is caveated with 'where reasonable'. Matters can also be escalated to a 'Vulnerability specialist'.	No. Not addressed.	Yes. They will proactively ask customers who identified as being affected by family violence what their financial situation is so Zurich can determine if financial hardship is occurring.	No. Not addressed.	Yes. They engage with customers to determine if they need to involve a financial counsellor, lawyer, community services or social worker, legal aid officer or family violence specialist.	Yes. Provides employees with support through an employee assistance line, discussions with management or human resources, training, and providing of 'resource documents'.	6.5/11* Addresses much of the Guidance in at least partial detail however it needs improvement. * Note: If we were to consider the policy as a whole and against other policies, we would

Attachment A: Desktop audit of general insurance family violence policies, August 2021

	<p>'Family violence is not limited to physical instances of violence and may also include, emotional, psychological, financial/economic, sexual abuse and threats of abuse. Family violence can include damage to property and animals'</p>				<p>pathway to a 'Vulnerability Specialist'.</p>				<p>Makes referrals to specialists, external family violence services and financial hardship services.</p>		<p>adjust the raw score to 7/11.</p>	
44 Arch LMI	Yes.	No.	Yes, partly.	Yes, partly.	Yes.	Yes, partly.	No.	Yes.	Yes, partly.	Yes, partly.	No.	5.5/11
	<p>Emphasis on support and assistance - particularly good times to communicate and ensuring it is safe to continue the call.</p> <p>Includes connecting the Insurer with an external support provider on the Customer's behalf.</p> <p>If the Customer prefers to talk with an employee of a particular gender 'if practical' the Insurer is open to arrangement.</p>	<p>No mention of early recognition of family violence - requires customers to notify them when 'they are in a position' to disclose</p>	<p>Training outline covers the Guidance in broad strokes, ie addressing vulnerability of customers; awareness of need to protect provided information; dealing with sensitively and compassionately with customers.</p> <p>Does not address how training will be conducted. Does not distinguish how training will be tailored to particular employees' role within the business - ie between employees and people in customer-facing roles.</p> <p>Does appear to be conscious of reducing effects of family violence. No mention of ensuring employees' aware of the Insurer's family violence policies.</p> <p>Does state they will 'review and update training on a regular basis' however does not say how often or how.</p> <p>Does emphasise treating Customers with 'sensitivity, dignity, respect and compassion' in accordance with</p>	<p>Does mention ensuring any personal information disclosed to the Insurer will not be disclosed to the alleged perpetrator of family violence even if they are the joint policyholder</p> <p>No mention of flagging system mentioned in Paragraph 32 of the Guidance.</p>	<p>Several mentions of effort to minimise need to repeatedly disclose by making a record.</p> <p>Recognises it may not be safe to communicate with the Customer at all times. Eg asking if the Customer is alone at the call.</p> <p>Acknowledges different ways to safely communicate and recording it (eg whether it is a good time to talk, if it is safe to leave phone messages; alternative methods of contact).</p>	<p>Policy states verbatim paragraph 39 and 40(h) of the Guidance.</p> <p>No mention of specialist employees handling claims.</p> <p>Does address flexibility in claims handling eg fast tracking claims, providing emergency payments/ accommodation and/or review decisions when ambiguity about cover.</p> <p>Otherwise does not satisfy paragraph 40 of the Guidance.</p>	<p>No mention of collection arrangements beyond 'if you have an outstanding debt with us, or are experiencing family violence which impacted on your financial wellbeing to meet your payment obligations, please contact us so we can discuss how we may help'</p>	<p>Provides the same information included in the Guidance Paragraph 43.</p>	<p>No additional information provided other than the information provided to refer customers, employees and distributors to specialist services.</p>	<p>Provides same information included in the Guidance Paragraph 51 - 54</p>	<p>No mention.</p>	<p>Addresses some of the Guidance, however lacks detail and scope in its application. Needs considerable improvement.</p>

Attachment A: Desktop audit of general insurance family violence policies, August 2021

				Paragraph 24(c) of the Guidance No mention of triaging matters.								
45 <u>Domestic and General</u>	Yes, partly. Overtones of safety and security being paramount, however vague security policy lacking details regarding processes.	Yes, partly. Provides definition of family violence. Does not state how the Insurer will become aware of family violence or how employees are able to recognise the signs of family violence 'early'. No other information provided referable to the Guidance in the Policy.	Yes, partly. States they provide 'training to help employees support, identify and avoid harm to customers affected by family violence' (Does not provide details on the type of training, content of training or frequency of training. Does not specify whether training is provided to all employees or just customer-facing employees. No other information provided referable to the Guidance.	Yes, partly. States they will be 'very careful' when dealing with customers affected by family violence. No detailed information on the process by which they will be 'very careful'. States (once notification received of family violence) the call service agent will make a record to ensure subsequent calls are managed discreetly. States the case will be referred to a specific case manager for the rest of the claim to ensure privacy and confidentiality concerns are complied with. Otherwise does not provide information on processes or training this claims officer will receive; or the risk to security of personal information where the perpetrator is also a joint policyholder. No other information provided referable to the Guidance.	No. No information provided referable to the Guidance in the Policy.	No. No information provided referable to the Guidance in the Policy.	No. No information provided referable to the Guidance in the Policy.	No. No information provided referable to the Guidance in the Policy.	No. No information provided referable to the Guidance in the Policy.	Yes, partly. Verbatim statement of Paragraph 54 of the Guidance	Yes, partly. Contains declaration they ensure that all employees and relevant parties are aware of Policy - however does not make policy explicitly applicable to employees also dealing with their own issues.	3/11* Vague policy which fails to apply the Guidance effectively, if at all. Requires much more detail and breadth in its coverage. Needs to reflect the Guidance more holistically. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 2.5/11.
46 <u>MunichRe</u>	Yes. Makes clear that the 'number one priority' is safety and security of the customer and family Acknowledges flexibility and sensitivity required for complex family	Yes. Provides definition of family violence for easy identification. Complies with Paragraphs 36-37 of the Guidance.	Yes. Comprehensive requirements for ongoing training adhering to majority of Paragraphs 18-26 of the Guidance (nearly verbatim)	Yes, partly. Reinforces the paramountcy of customer safety and protection. Adheres to Paragraph 28 and 29 of the Guidance.	Yes. Very comprehensive policy guidelines regarding the minimisation of repeat disclosures but omits reference to Paragraph 34 of the Guidance.	Yes, partly. Largely verbatim statement of paragraphs 39 - 40 of the Guidance - despite this, does not actually say the processes behind execution of these statements.	Yes, partly. Verbatim statement of paragraphs 44- 47 of the Guidance - despite this, does not actually state the processes behind execution of these statements.	Yes, partly. Verbatim statement of paragraphs 41-43 of the Guidance - despite this, does not actually state the processes behind execution of these statements.	Yes, partly. Focuses mainly on providing customers and employees with referrals. Leaves out distributors and service suppliers. States a "list of recognised external specialist services	Yes, partly. Verbatim statement of Paragraph 54 of the Guidance.	Yes. Provision of employee assistance programs to ensure support is provided to employees affected by family and domestic violence.	9/11 Addresses most of the Guidance albeit verbatim. More detail should be provided surrounding how the Guidance will be applied at the insurer and the

Attachment A: Desktop audit of general insurance family violence policies, August 2021

	violence issues referred to in the overview of the Guidance.	Refers to the early indicators of family violence but does not provide examples. States 'service suppliers that are used to work with the claimants must also be trained to recognise possible family violence and to respond accordingly'.		Adheres to flagging system suggestion in paragraph 32 of the Guidance. Somewhat vague - does not go into the granularity included in paragraph 33 of the Guidance					will be kept up to date and to a minimum" however does not provide information to where these will be kept or who will have access.		Provision of training, leave, additional security measures, external referrals and counselling. Clear concerted effort regarding ensuring employees are getting the same support as customers. Largely compliant with the Guidance.	unique processes it will have to enable consistent an effective implementation of the Guidance in practice.
47 <u>Lloyds</u>	Yes, partly. Overtones of sensitivity and safety are evident. No explicit mention of safety. Much of policy is vague and relies on notification by affected policyholder as to their situation. Unclear processes involved to ensure safety - short statement gives broad overview of some of the Guidance.	No. No mention of early recognition of family violence - relies on notification of policyholder to their situation.	Yes, partly. States they provide 'appropriate' training to customer-facing employees; No mention of other employees/ distributors receiving training. States training will be 'ongoing' (paragraph 18 of the Guidance) as they 'will review and update training on regular basis'. No mention of awareness of organisation's policies regarding engaging with someone who is experiencing family violence. Acknowledges paragraphs 18 (c), Paragraph 12 (d) of the Guidance. Training designed to assist customer-facing employees in 'identifying' customers affected by Family Violence, however does not go into detail provided in paragraph 19 of the Guidance.	Yes, partly. Adherence to Privacy Act 1988 (Cth) and 'any other applicable laws'. Provides commitment to handling personal information with security; providing customer with their preferred method of communication; however does not provide detail of the processes or mechanisms in which they can support this. Verbatim statement of Paragraph 29 of the Guidance. Implied adherence to Paragraph 30 of the Guidance. Recommends updating any personal security codes to prevent the alleged perpetrator from accessing information, however doesn't provide support for the implications if the perpetrator is a joint policyholder.	Yes, partly. Several mentions of concerted effort to record on file issues regarding family violence to minimise repeated disclosure.	Yes, partly. Provides option for employee of select gender to interact with customer. Verbatim statement of paragraphs 39 and 40 (h) of the Guidance and vague reference to paragraphs 33(f) and (h) of the Guidance.	No. No mention of collection arrangements	No. Omits mention of fast-tracking requests, pausing premium payments or accessibility for joint policy holders. Refers primarily to external Financial Hardship Policy. Provides assurance that they will: <ul style="list-style-type: none">■ ensure recovery action is put on hold until review complete; and■ make sure they are aware of certain free assistance services which may be available.	Yes, partly. Provides an inclusive list of services/referrals from paragraph 54 of the Guidance for employees and customers in policy document. Does not explicitly mention whether information will be made available to employees/ distributors.	Yes, partly. Verbatim list of referrals from paragraph 54 of the Guidance.	No. No provided support for employees in Policy.	3.5/11 Policy is vague in its application of the Guidance. Some areas of the Guidance are not dealt with at all. Improvements are required regarding level of detail and processes to be implemented to ensure the Guidance is complied with in practice.