

Family Violence and Life Insurance: Desktop audit of family violence policies

Introduction

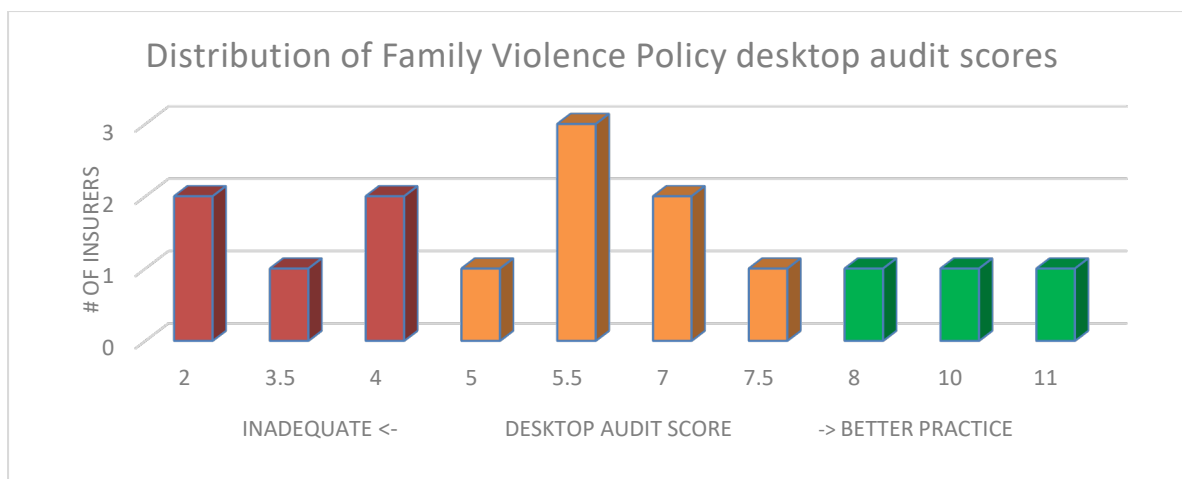
The 2023 Life Insurance Code of Practice (**the Life Insurance Code**) introduced a requirement for insurers to have family violence policies available online for their customers. For many life insurers this will be the first publicly available written policy indicating how they will support customers experiencing family violence. Family violence – in the form of physical, emotional, psychological, sexual, financial or economic abuse in a family or domestic context - is a scourge and life insurance can unfortunately be intentionally or unintentionally used by perpetrators to harm victims.

The Financial Rights Legal Centre (**Financial Rights**) saw this as an important opportunity to inquire into which life insurers' written policies demonstrated best practice, and to benchmark all Life Insurance Code subscribers to encourage ongoing improvements to their family violence policies.

This exercise was a point-in-time desktop audit of insurers' written policies, as at August/September 2023. It was not an assessment of a subscriber's compliance with, and implementation of, their own family violence policy. Nor was it an evaluation of a subscriber's culture of supporting customers experiencing family violence, or a judgement on a life insurer's internal policies that may or may not address the expectations of the Life Insurance Family and Domestic Violence Policy guide.

Key findings

- Noble Oak has the strongest family violence policy in the life insurance industry. Only Noble Oak 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: Metlife.
- One insurer achieved an 8 and another 7.5 out of 11 score: Resolution Life and Hallmark respectively.
- Disappointingly a little over half the subscribers scored 5.5 out of 11 or less.
- Five insurers scored less than 4 or less out of 11.
- Two insurers scored 2 out of 11: HCF and QInsure



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

Best practice

We encourage all life 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, Life Insurance Code subscribers should:

- adopt the approach of the Noble Oak 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 Noble Oak 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 Allianz, Resolution Life¹, and TAL policy;
 - specifically state that employees will be supported if vicariously impacted after helping affected customers: see the AIA, Allianz, Metlife, Resolution Life and TAL policies;
 - do not require notification to the police about a perpetrator of family or domestic violence: Noble Oak and Resolution Life.

Additional recommendations

Clarify the language of the guide

We note that the key requirements of the guide are similar although not identical to the guide for General Insurers.² In future iterations it may be worth examining specific issues that arise with respect to the interaction of family violence and life insurance. This includes life insurance

¹ The large exit button only appears on the main page of Resolution Life, which deals with vulnerabilities generally including FDV, but the exit button is not available when on the actual policy.

² Insurance Council of Australia, [Guide to helping customers affected by family violence](#)

product and service design features that may empower perpetrators to hold life insurance policies over those they are perpetrating against.

While the majority of the requirements are clear, a range of ambiguities became apparent when assessing the policies against the existing guide. This may have impacted the ability of insurers to develop effective policies themselves. The following ambiguities were identified:

- item (a) – it is not clear what ‘reasonable’ is with respect to customers communication preferences. Examples could be provided including supporting a gender preference when speaking to an employee whom a customer may feel more comfortable in communicating with, or a preference for a specific form of contact be it phone, email etc.;
- item (e) – there is no a definition for “directly and regularly” informing customers and employees with updated online and printed material about information and assistance available to customers experiencing family and domestic violence. It also does not provide an indication about how much “information and assistance” is sufficient;
- item (f) – we would recommend that life insurers commit to including not just the names of available external support resources but their contact numbers and email addresses for ease and quick access;
- item (j) – we recommend the guide should require a distinct fast-tracked complaints procedure for customers to specifically lodge any complaints with respect to compliance with the customer family and domestic violence policy – rather than relying solely on the standard complaints route. This would be in line with [ASIC RG 271.158](#) regarding the triaging of priority complaints; and
- item (k) – it is not clear what ‘regular monitoring’ of the family and domestic violence policy means.

Addressing these will enable insurers to strengthen their policies and better protect their customers.

Inclusion of key elements of the guide in the Life 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 Life Insurance Family and Domestic Violence Policy guide be included in the Life Insurance Code in such a way that empowers the Life Code Compliance Committee (LCCC) to fully assess subscribers meeting the content expectations of a family violence policy and compliance with their commitments made under those policies. Establishing these key elements as minimum standards under the Code, rather than “good practice” that is merely voluntary and aspirational in nature will ensure that insurers take them as seriously as their other code obligations.

We also recommend Council of Australian Life Insurers (CALI) or the LCCC to maintain a central page providing links to each subscriber’s family violence policy for ease of access.

Background

The 2023 Life Insurance Code introduced new provisions requiring subscribers to have family violence policies available online for their customers by 1 July 2023. CALI members who are Reinsurers are not required to meet clause 6.6 since clause 1.16 binds them to only have to meet the principles at clause 1.6.

Clause 6.6 of the 2023 Life Insurance Code commits all subscribers who provide retail insurance products to:

... have a publicly available policy on our website about how we will support you if you are affected by family violence .

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 out life insurance policies on those they are perpetrating against, or can provide inaccurate information to insurers to jeopardise the policy. Survivors of family violence can also be treated poorly by insurance claims handling processes, including being required to contact a perpetrator thereby directly endangering them and placing them at risk of further abuse.

To support their subscribers, the Financial Services Council Australia (**FSC**) (the original code owner) developed the *FSC Life Insurance Family and Domestic Violence Policy* which sets out how insurers can identify and support people affected by family violence. While this guide is voluntary and does not bind insurers, it does identify 11 areas to be covered by subscribers in a family violence policy.

We are aware that the LCCC has undertaken a more general review to ensure that life insurers had a publicly available policy. Financial Rights supports LCCC's general findings and recommendations.

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 encourages life insurers to learn from and build upon each other's approaches in a positive and constructive manner to ensure that all reasonable steps are taken to optimise safety and mitigate the negative impacts of abuse on victim survivors of family violence.

Methodology

Financial Rights undertook a point-in-time desktop audit of 15 Life Insurance Code subscriber family violence policies.³ These policies were accessed from insurer websites in August and

³ A further two Life Insurance Code subscribers (Munich Re: and SCOR) are not technically required to have a family violence policy.

September 2023.⁴ The aim of the audit was to examine whether subscriber's family violence policies addressed the 11 areas listed in the FSC Life Insurance Family and Domestic Violence Policy to be covered in a subscriber's family violence policy. We also wanted to identify best practice commitments to customers and benchmark the 15 policies to measure future improvements. The guide states that:

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

- a. *making sure that safety is paramount for customers affected by family and domestic violence through the protection of private and confidential information. These measures include taking the customer's reasonable communication preferences into account with mechanisms to ensure adherence to these and using technology to improve customer safety*
- b. *training to ensure employees are equipped to respond appropriately to customers affected by family and domestic violence. This includes enabling early recognition of customers who are affected by family and domestic violence*
- c. *minimising the number of times a customer affected by family and domestic violence needs to disclose information about their abuse*
- d. *promoting, enabling and arranging access to financial hardship help*
- e. *informing customers and employees directly and regularly with updated online and printed material about information and assistance available to customers experiencing family and domestic violence*
- f. *referring customers and employees to specialist support services; and*
- g. *supporting employees who:*
 - a. *are affected by family and domestic violence, and/or*
 - b. *experience vicarious trauma after serving affected customers or assisting affected colleagues*
- h. *Commitment to the customer that their family and domestic violence situation will have no adverse effect on their claim if applicable*
- i. *taking family and domestic violence into consideration when designing products*
- j. *outlining a complaints procedure for customers to lodge any complaints with respect to compliance with the customer family and domestic violence policy*
- k. *regular monitoring of the customer family and domestic violence policy, its associated procedures, and how it is working in practice in support of customers experiencing family and domestic violence*

⁴ Insurer's family violence policies may have been updated since August/September 2023. We are aware, for example that MLC updated their policy in December 2023. Other insurers, such as Resolution Life, indicate the date the policy is up for review. Resolution Life's policy was last approved in September 2022 and it notes that the policy will be reviewed in September 2024 as it is to be reviewed every 2 years. Updating and improving family violence policies is welcome and encouraged in line with the aims of the exercise.

Note - This guide does not bind insurers. Nor does it have legal force. Complying with the guide is voluntary.

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.

0 - not addressed	0.5 - partially addressed	1 - addressed
Item is not addressed at all within the policy	Item is referred to in the policy but not how it will be achieved or is not referred to within the policy but is in a document referred to within the policy	Item is referred to in the policy together with how it will be achieved

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 following a wholistic comparison of the policies.

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 an insurer is less likely to be called on to act on it because the insurer only offers a narrow range of products. Ultimately, the aim of this exercise is not to seek to create a level playing field for insurers but to optimise outcomes for victim survivors.

Finally, as a desktop audit, we were not privy to internal policies that may or may not address the criteria set out in the Guide. The fact that customers are also not able to access internal documents that address these criteria speaks to a need for the family violence policies to publicly address the requirements of the guide.

What follows is the point-in-time Desktop Audit at Appendix A. The table is in alphabetical order and addresses each of the 11 points and offers a score out of 11 to indicate compliance with the guide.

Appendix A: Desktop Audit of Life Insurer Family Violence Policies, August/September 2023

Insurer	a. making sure that safety is paramount for customers affected by family and domestic violence through the protection of private and confidential information. These measures include taking the customer's reasonable communication preferences into account with mechanisms to ensure adherence to these and using technology to improve customer safety	b. training to ensure employees are equipped to respond appropriately to customers affected by family and domestic violence. This includes early recognition of those affected by family and domestic violence	c. minimising the number of times an affected customer needs to disclose information about the abuse	d. promoting, enabling and arranging access to financial hardship help	e. informing customers and employees directly and regularly with updated online and printed material about information and assistance available to customers experiencing family and domestic violence	f. referring customers and employees to specialist support services	g. supporting employees who: (a) are affected by family and domestic violence, and/or (b) experience vicarious trauma after serving affected customers or assisting affected colleagues	h. commitment to the customer that their family and domestic violence situation will have no adverse effect on their claim if applicable	i. taking family and domestic violence into consideration when designing products	j. outlining a complaints procedure for customers to lodge any complaints with respect to compliance with the customer family and domestic violence policy	k. regular monitoring of the customer family and domestic violence policy, its associated procedures, and how it is working in practice in support of customers experiencing family and domestic violence	Comment
1 AIA	Partly (0.5) The policy refers to the point but does not provide an explanation how it will be achieved.	Partly (0.5) Policy indicates AIA will ensure staff are appropriately trained but not how they will be trained.	No (0) Policy does not detail information minimisation strategy.	Partly (0.5) Policy refers to 'easy access' and communication but not how it will ultimately be achieved.	No (0) Policy does not indicate material will be updated online although provides basic information regarding support providers.	Partly (0.5) Policy indicates customers can be referred to a support service if relevant but does not elaborate when this is 'relevant' or the procedure adopted.	Yes (1) Policy indicates that affected staff (either directly or vicariously) will be supported including by referral to support services or providing flexible work arrangements.	Yes (1) Ensures claim will not be impacted and refers to flexible and priority claim assessment, minimising information required and assistance to obtain the information.	No (0) No information provided about taking family and domestic violence issues into consideration when designing products.	Yes (1) Policy states easy access to complaints process and a link is provided to the complaints policy with information how to lodge a complaint.	Partly (0.5) States policy is reviewed periodically and every three years minimum. No further elaboration.	5.5/11* Short, easy to read policy that addresses briefly every point raised in the guideline but does not elaborate on application. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 4/11 for brevity and failure to address 2 items in whole
2 Allianz	Yes (1) Policy states safety of the customer and their children is prioritised and that private information will be protected, including discussing safe ways to communicate with the customer and accommodating communication preferences e.g. gender.	Yes (1) Employees, agents, partners, distributors and suppliers are trained to handle claims process, identify early signs, respond with dignity, respect and care, refer internally to specialist team for more support, refer externally to community services.	Yes (1) Case managers can minimise disclosure and confidentiality can be provided, sensitive claims handling, and financial hardship assistance.	Yes (1) Financial hardship assistance, such as deferred or reduced premiums and excess payments. Debt may be waived, kept in house or bought back from debt collectors.	No (0) Policy does not provide when, where or how material is updated.	Yes (0.5) Policy indicates customer referrals to appropriate support agencies, both internally and externally which also includes employees as well, but does not elaborate when this is 'appropriate'. Further information provided as to which services are available.	Yes (1) Policy indicates that affected staff (either directly or vicariously) will be supported including by referral to support services or providing flexible work arrangements. Support provided to employees are training, additional leave and external referrals.	No (0) No information provided.	No (0) No information provided on this area.	No (0) No information provided regarding complaints procedure.	No (0) No information provided as to the regular monitoring of the policy	5.5/11* The policy spans 9 pages including organisation contact details and definition but fails to refer to a number of the criteria. * 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 for failing to cover nearly half the items
3 Clearview Clearview 2	Yes (1) Customers can make contact by phone, post and email. Policy states use of relay calls for people with hearing disabilities and translation services and will provide other options for customers who need it or are in remote areas. Policy further states 'that any decision made considers [the customer's]	Yes (1) Policy indicates staff are experienced, will take additional care and a dedicated claims assessor is assigned to each claim, to ensure it is handled with due regard for the situation.	Partly (0.5) Policy states that they will endeavour to 'minimise the need for repeated disclosure of the customer's situation' but provides no further information on how this is achieved or what can be done in circumstances	Yes (1) Clearview will 'consider making changes to your policy' if financial hardship is experienced; help pay out a claim (or benefits) faster than usual, and offers support.	No (0) No information provided.	Yes, partly (0.5) Policy indicates additional options for support will be offered 'where appropriate' but no elaboration as to which services this includes or in what circumstances.	Partly (0.5) Indicates that support will be given including relevant training and access to support services such as EAP but no further detail is provided.	No (0) No information provided.	No (0) No information provided.	Partly (0.5) The specific policy does not refer to the complaints process although there is a link to 'Complaints', and there indicates complaints can be made by the customer or by someone on behalf of the customer and a link it provided to	No (0) No information provided.	5/11 The policy touches on a number of the requirement but lacks details and fails to include all the required information in the policy.

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Insurer	a. making sure that safety is paramount for customers affected by family and domestic violence through the protection of private and confidential information. These measures include taking the customer's reasonable communication preferences into account with mechanisms to ensure adherence to these and using technology to improve customer safety	b. training to ensure employees are equipped to respond appropriately to customers affected by family and domestic violence. This includes early recognition of those affected by family and domestic violence	c. minimising the number of times an affected customer needs to disclose information about the abuse	d. promoting, enabling and arranging access to financial hardship help	e. informing customers and employees directly and regularly with updated online and printed material about information and assistance available to customers experiencing family and domestic violence	f. referring customers and employees to specialist support services	g. supporting employees who: (a) are affected by family and domestic violence, and/or (b) experience vicarious trauma after serving affected customers or assisting affected colleagues	h. commitment to the customer that their family and domestic violence situation will have no adverse effect on their claim if applicable	i. taking family and domestic violence into consideration when designing products	j. outlining a complaints procedure for customers to lodge any complaints with respect to compliance with the customer family and domestic violence policy	k. regular monitoring of the customer family and domestic violence policy, its associated procedures, and how it is working in practice in support of customers experiencing family and domestic violence	Comment
	<i>safety and wellbeing first, whilst making sure that all information is treated with the utmost confidentiality.'</i>		where repeated disclosure is required.							the complaints handling policy. Complaints can be made by phone, online form, email or post.		
4 Hallmark Hallmark 2 <i>Policy identified as Latitude</i>	Yes (1) Hallmark <i>'takes its obligations to protect...personal information seriously'</i> ensuring against inadvertent disclosure and taking additional caution recording sensitive information. Refers reader to Privacy Policy. Preferred communication method for safety referred to.	Yes (1) Staff are trained to support customers who are vulnerable, to identify potential indicators of family and domestic violence and know how the Insurer may be able to assist. Support also may be provided to the customer by staff handling claims with sensitivity and care, being flexible in approaches and accommodate a customer's needs and personal circumstances.	Yes (0.5) Policy states that will minimise the need for repeated disclosure and if the customer has an existing claim, <i>'reasonable steps'</i> will be made to ensure customer liaises with the same claim specialist. <i>'Reasonable steps'</i> is not defined.	Yes (1) Claim may be fast tracked and, if eligible, will consider advance payments to ease a customer's financial situation. Hardship Care Team dedicated to assist and a link to the application is provided as well as indication that it will be determined within 21 calendar days.	Yes (1) Policy will be reviewed annually and updated <i>'from time to time'</i> and published on their websites.	Yes (1) Policy provides a list of external support services (including contact details) that are available for customers both in Australia and New Zealand.	Yes (1) Committed to supporting employees affected by domestic and family violence (directly or indirectly by family and domestic violence) and have measures in place including an EAP, domestic and family violence leave, network of mental health first aiders, flexible work arrangements and emergency accommodation.	No (0) No information provided.	No (0) No information provided.	No (0) No information provided regarding complaints procedure.	Yes (1) See (e).	7.5/11* Addresses majority of the Code. There are some areas that provide information about specific measures in place, whereas other areas only provide general information. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 8/11 due to specificity on items addressed.
5 HCF	Yes, partly (0.5) Mentions having a range of security measures in place to protect personal details and use of an application for members but no further information regarding use of customers preferred communication method etc.	No (0) No information provided regarding employee training.	No (0) No information provided regarding minimising the number of times a customer needs to disclose information about abuse.	Yes, partly (0.5) Mentions options provided if the customer experiences financial hardship, referring members to other policies, but no specific details.	No (0) Insurer can update policyholders on their policy but no information further provided.	Yes, partly (0.5) Policy provides a list of external services with contact details.	No (0) No information provided.	No (0) No information provided.	No (0) No information provided.	Partly (0.5) Not within policy but there is a tab on the website regarding this.	No (0) No information provided.	2/11* Vague policy which fails to apply the code effectively, if at all. Requires much more detail and breadth in its coverage. Needs to reflect the code more holistically. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 0.5/11 on that basis.
6 HLRA	Yes (1) <i>'The support of customers experiencing [it] and their family is the highest</i>	Yes (1) The 'supporting customers' document confirms ongoing	Partly (0.5) HLRA will take reasonable measures to	Partly (0.5) See (c). Further Policies refer to support to	No (0)	Partly (0.5) Policy provides list of support services and resources but	No (0) The policy does not refer to employees.	No (0) The policy does not refer to this.	No (0) The policy does not refer to this.	No (0) No detail provided on how policy is being regularly	No (0) No detail provided on how policy is being regularly	3.5/11* Policy does not address all the criteria

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	<i>priority</i> '. Refers to safe and confidential communication in light of personal circumstances and 'supporting customers' document contains more information regarding flexibility and to ensure customers do not suffer further distress or harm.	training for customer facing staff to be alert to vulnerability signs and to handle with care and respect. Formalised training is part of the staff's schedule of development.	provide support for customers to meet identification requirements but otherwise doesn't refer to repeated disclosure.	customers experiencing financial hardship but does not indicate the support that might be offered.	Does not refer to the provision of updated material.	does not refer to employees requiring specialist support services.				The policy does not refer to a complaints process.	reviewed or monitored.	and requires much more detail. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 3/11 due to absence of majority of items.
7 Integrity	Yes, (1) Clear statement this is of utmost importance to them but that the family violence measures are contained within the 'Supporting our customers policy' which deals with all vulnerable customers. Privacy and confidentiality are addressed.	Yes (1) The statement regarding why there is not a separate Family Violence Policy refers to the staff guidance policy being reviewed every 2 years or earlier if needed, consistent monitoring of policies to identify gaps, and comprehensive training for all frontline employees together with appropriate assistance and protection.	No (0) This is not referred to in the policy.	Yes (1) Clear statement of strong commitment to supporting affected customers suffering ' <i>financial distress or hardship</i> .' Financial advisor, applying freeze on premiums, temporarily suspending cover for up to 12 months during time you would not be covered or waiving premiums for up to 3 months referred to.	Partly (0.5) See (b). Policy does not refer to informing customers and employees of the updates.	Yes (1) They provide a link to additional support services	Partly (0.5) Statement regarding why there is not a separate Family Violence Policy states that employees are offered appropriate assistance and protection but does not state what that includes.	Yes, partially (0.5) Claim will be fairly managed; however it is not clear how this is facilitated.	No (0) Not referred to.	Partly (0.5) Not directly referred to although there is a complaints page on the website.	Yes (1) Statement of absence of Family Violence Policy notes all vulnerabilities identified are consistently monitored to ensure any gaps in policy are addressed.	7/11* A reasonable policy. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score down to 6/11 for not having a dedicated Family Violence Policy.
8 Metlife	Yes (1) Committed to assisting all affected customers; ensure a sensitive and confidential claims handling process ' <i>except to the extent that disclosure is required by law</i> .'	Yes (1) Training provided to employees to ensure recognition and response as early as possible and with empathy and compassion.	Yes (1) Committed to minimising times customers affected need to disclose this information and reiterate customers ' <i>have the right to choose whether, when and to whom you disclose information about being affected by family and domestic violence</i> .'	Yes (1) Access to financial hardship help and acceleration of claim decision outcomes with a ' <i>prioritised claims handling process</i> .'	Yes (1) Monitor guidance, procedures, and feedback regularly to ensure follow through on commitment.	Yes (1) A list of additional support referred to including for different groups of customers.	Yes (1) Employees are provided additional support if they are affected vicariously during any customer interactions that include family and domestic violence references or statements. An employee specific Family and Domestic Violence Policy is referred to which provides guidance for	Yes (1) Domestic and family violence will have no adverse effect on the customer's claims.	No (0) No mention of taking family violence situation into consideration when designing products	Yes (1) Dissatisfied customers are 'encouraged' to complete a complaints handling form or to contact the organisation, with contact details also supplied.	Yes (1) Policy makes it clear that they: ' <i>will regularly monitor our guidance, procedures, and feedback to ensure we are following through on our commitment</i> .'	10/11 - Strong policy however information regarding product development is required.

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							employees on how to respond and refer effectively to both internal and external support.					
9 MLC <u>MLC (additional support)</u>	Partly (0.5) Policy doesn't acknowledge safety is paramount although acknowledges safety issues.	Partly (0.5) Reference to ensuring staff 'likely to interact' with affected customers have 'role-appropriate training and reference documents' but does not refer to how often this training is reviewed.	Yes (1) Confirms the minimisation of disclosure where reasonable and that they will take into account access to personal information might be difficult.	Partly (0.5) Indication that they can discuss alternative ways to assist/manage insurance arrangement but does not provide examples or options.	No (0) Reference made to the Financial Hardship & Vulnerable Customer Policy; however this policy is not readily available.	Yes, partially (0.5) Mentioned that referral can be made but does not list support services available.	No (0) No mention of vicarious trauma or employees.	No (0) No mention or commitment of having no adverse action of claim due to family violence situation.	No (0) No mention of taking family violence situation into consideration when designing products	Yes (1) MLC offers a link to access information about the complaint management process here not specific to family violence victims and commits to resolving the issue, if not immediately, within five business days.	No (0) No detail provided on how policy is being regularly reviewed or monitored.	4/11* Significant room for improvement. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score down to 2/11 as a number of the criteria are not addressed at all.
10 Munich Re												
11 NobleOak <u>Third-party distributors : Genus⁵</u>	Yes (1) They have established a comprehensive 9 page policy (in downloadable PDF format), specifically designed to assist affected customers. Family violence customer safety is prioritised, and sensitive, private and confidential information is protected.	Yes (1) Employees receive training and access to courses relevant to their roles and online links to support services. These are regularly updated to ensure the latest information. The policy lists signs employees look when interacting with customers.	Yes (1) Policy confirms their Client Care team will ensure that disclosure is minimised and ways in which the claim can be handled sensitively, does not require police notification of family violence situation and as this insurer has direct policies with a single policy holder only, confidential conversations can be had and recorded without fear of disclosure	Yes (1) Policy confirms affected customers may receive financial hardship assistance including review of cover to make sure it is right, deferred payments for premiums, changing how often payments are made, developing a payment plan, reduced or waived claims excess payments.	Yes (1) Commits to regular review of policy and update to working to ensure its factually correct and relevant, test and update web links and contact details for external support providers, ensure updates and reflected in revised version published on the website, provide employees with relevant updates and training, and analyse information to ensure policy is working practice etc.	Yes (1) In addition to the range of external resources provided, the policy also states that they can assist with referrals to community organisations to receive additional support.	Yes (1) The policy expressly recognises employees might suffer various trauma and that support will be provided through training, additional leave and external referrals.	Yes (1) Policy confirms that if a customer informs them that they are affected, they can better support them during the claims process and it 'will not have any adverse affect' on 'or prejudice your claim'.	Yes (1) Policy confirms consideration when designing their life insurance products. All direct policies have a single policy holder only; there are no joint policies. This ensures policy holders and claimants can have confidential conversations without risk of a family member or partner finding out those details.	Yes (1) They offer direct access to a Client Manager to any customer who wishes to lodge a complaint with respect to a domestic and family violence matter.	Yes (1) The policy makes it clear that: 'this policy and its associated procedures and external support links are regularly monitored as part of NobleOak's Life Insurance Code of Practice compliance framework' and indicates what will be done during the review. 'Regular' is however undefined consistent with other policies reviewed.	11/11 An excellent policy!

⁵ Genus has its own website and provides management and ongoing services in relation to Life policy administration

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Insurer	a. making sure that safety is paramount for customers affected by family and domestic violence through the protection of private and confidential information. These measures include taking the customer's reasonable communication preferences into account with mechanisms to ensure adherence to these and using technology to improve customer safety	b. training to ensure employees are equipped to respond appropriately to customers affected by family and domestic violence. This includes early recognition of those affected by family and domestic violence	c. minimising the number of times an affected customer needs to disclose information about the abuse	d. promoting, enabling and arranging access to financial hardship help	e. informing customers and employees directly and regularly with updated online and printed material about information and assistance available to customers experiencing family and domestic violence	f. referring customers and employees to specialist support services	g. supporting employees who: (a) are affected by family and domestic violence, and/or (b) experience vicarious trauma after serving affected customers or assisting affected colleagues	h. commitment to the customer that their family and domestic violence situation will have no adverse effect on their claim if applicable	i. taking family and domestic violence into consideration when designing products	j. outlining a complaints procedure for customers to lodge any complaints with respect to compliance with the customer family and domestic violence policy	k. regular monitoring of the customer family and domestic violence policy, its associated procedures, and how it is working in practice in support of customers experiencing family and domestic violence	Comment
12 Qinsure	Partly (0.5) The word safety is not used. However, insured will be asked for preferred contact method or if they would like to provide a third party authority instead. Policy mentions privacy but not how adherence is ensured. A separate 'vulnerable member hub' accessible to staff states staff should reaffirm privacy needs when updating personal details, ensure safe contact details for, ensure best channel of contact and confirm most suitable day/time for contact.	No (0) The policy does not mention training or early recognition, and places the onus on the insured to 'let [Qinsure] know' if they are affected. Presence of staff 'vulnerable member hub' suggests there may be training provided to some employees in how to respond appropriately but this is not clear.	No (0) Not mentioned in the policy at all. Mentioned very briefly in the vulnerable member hub.	Partly (0.5) Policy states they will 'provide contact details for support services that might be able to help' but does not mention financial support specifically. The vulnerable member hub states that staff should consider whether the customer may be eligible to access super early.	Partly (0.5) Policy states they will 'provide contact details for support services that might be able to help', but does not specify how regularly such information will be provided. Vulnerable member hub provides three links: Lifeline, National Debt Helpline and DV Connect.	Partly (0.5) Policy states they will 'provide contact details for support services that might be able to help', but only for customers not employees. Vulnerable member hub provides three links: Lifeline, National Debt Helpline and DV Connect.	No (0) Not mentioned at all.	No (0) Not mentioned at all.	No (0) Not mentioned at all.	No (0) Not mentioned at all.	No (0) Not mentioned at all.	2/11* Poor policy that does not address any criteria in full or at all. No reference to measures used to support employees. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 2.5 for its description of the 'vulnerable member hub'.
13 Resolution Life	Partly (0.5) Staff should 'engage with the customer to discuss and agree safe ways to communicate' and record these on the customer's file but lacks specifics on the mechanisms/technology used to improve safety.	Yes (1) Clearly states staff will be provided ongoing training to deal with sensitive matters, including early recognition of domestic and family violence even if there is no evidence of an intervention order.	Yes (1) Customers need only to speak to one staff member where possible and that they will minimise disclosure.	Yes (1) Customers will be referred to fast-tracked financial hardship support (insurance, superannuation and investment services), with ability to retain their policy even if unable to pay premiums.	Partly (0.5) Staff 'can' refer to a list of recognised specialist services set out in a 'Domestic and Family Violence Guidelines' document and inform customers of such assistance, however said document does not seem to be available online.	Yes (1) Mentions provision of support to both customers as well as staff, whether staff are personally affected or vicariously and lists a number of methods of assistance.	Yes (1) Mentions support employees who are directly affected and those indirectly affected from their work in supporting vulnerable customers. Specifies such support provided through 'employee assistance line, line management or human resources discussions, training, and the provision of resource documents.'	Partly (0.5) Mentions 'sensitive claims handling' and highlights that customers affected may come across as incoherent or uncommunicative, which does not indicate an invalid claim. However, it does not state outright that being affected by domestic violence will not affect the claim at all.	Partly (0.5) Provides guidance in relation to how claims should be managed, including not requiring that a claimant make contact with a perpetrator and making sure claims are paid out to an appropriate party.	Partly (0.5) States customers can make a complaint and Resolution Life will provide information about the complaint management process, but does not outline the steps involved to make a complaint.	Partly (0.5) The Chapter Area Lead - Customer Experience is tasked with monitoring adherence to the policy and ensuring appropriate controls are in place, but the frequency of monitoring is not set out. Review of the policy takes place only every two years or upon 'significant legislative or industry change'.	8/11* Overall a comprehensive policy that clearly sets out mechanisms to support and protect both customers and staff. Some particulars missing. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 8.5/11 as all areas addressed at least in part
14 SCOR												
15 Swiss Re Partners: Insurance Everyday	Partly (0.5) States safety is paramount; systems and processes only allow authorised employees access to	Yes (1) States that it is of 'critical importance' that employees receive appropriate	Partly (0.5) This factor is listed verbatim in the 'How we can help' section, but the	Partly (0.5) Policy mentions 'offering Financial Hardship support' but does not explain	Partly (0.5) Provides a list of links to support services at the end of the document,	Partly (0.5) Mentioned for customers only.	Partly (0.5) The point is mentioned verbatim in the policy but no specifics as to	No (0) Not mentioned at all.	No (0) Not mentioned at all.	No (0) Not mentioned at all.	No (0) Not mentioned at all.	4/11 A simple policy which touches on over half the criteria but is short on detail on

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Insurer	a. making sure that safety is paramount for customers affected by family and domestic violence through the protection of private and confidential information. These measures include taking the customer's reasonable communication preferences into account with mechanisms to ensure adherence to these and using technology to improve customer safety	b. training to ensure employees are equipped to respond appropriately to customers affected by family and domestic violence. This includes early recognition of those affected by family and domestic violence	c. minimising the number of times an affected customer needs to disclose information about the abuse	d. promoting, enabling and arranging access to financial hardship help	e. informing customers and employees directly and regularly with updated online and printed material about information and assistance available to customers experiencing family and domestic violence	f. referring customers and employees to specialist support services	g. supporting employees who: (a) are affected by family and domestic violence, and/or (b) experience vicarious trauma after serving affected customers or assisting affected colleagues	h. commitment to the customer that their family and domestic violence situation will have no adverse effect on their claim if applicable	i. taking family and domestic violence into consideration when designing products	j. outlining a complaints procedure for customers to lodge any complaints with respect to compliance with the customer family and domestic violence policy	k. regular monitoring of the customer family and domestic violence policy, its associated procedures, and how it is working in practice in support of customers experiencing family and domestic violence	Comment
Medibank⁶	personal information on a need-to-know basis. Does not refer to taking customers' preferences into account.	training, including early recognition and appropriate support, and commits to doing so at 'appropriate frequencies'.	specifics on how it will be achieved are not mentioned.	how this will be achieved or the kinds of support that may be facilitated.	but does not commit to regular and direct informing of customers and employees with updated material.			implementation are provided.				implementation. A number of criteria not addressed at all including the effect on claims, product design, complaints procedure and policy monitoring.
16 TAL	Partly (0.5) States customers should ensure communication preferences up to date and that disclosed information will be confidential, but does not give any details as to the technology and mechanisms used to ensure adherence.	Yes (1) Mentions staff will be trained how to support customers experiencing family violence, including 'recognising the early signs of domestic and family violence' and improving their responses to affected customers.	Partly (0.5) Mentioned but no details given on how it will be achieved.	Yes (1) States that TAL 'will provide' financial relief to eligible customers in accordance with a separate <u>Financial Hardship Policy</u> which includes, among other things, grace periods for missing premium payments.	Partly (0.5) Mentions TAL will 'offer expert external support services' and links to the 1800RESPECT website, but does not otherwise refer to the provision of updated material/information to customers.	Yes (1) States customers will be offered expert external support services, while staff who TAL is aware are 'affected by family violence' will be given support services, leave and flexible working arrangements.	Partly (0.5) Although some support services available to employees are described, the policy does not mention whether these measures will be available to employees who are vicariously impacted.	Partly (0.5) Commits to not using external debt collectors to chase outstanding premiums, customers will be contacted before their policy lapses and TAL will assist customers to retain cover if they wish. However, does not expressly state that claims will not be affected by the domestic violence situation.	Partly (0.5) States potential impacts and implications of family and domestic violence are 'take[n] into consideration' during product design but gives no further details.	Yes (1) States complaints can be raised using customer complaints procedure and directed to Internal Dispute Resolution team for review. Links to a separate webpage setting out the Complaint Handling Process.	No (0) Not mentioned at all	7/11. A good policy with room for improvement. Most criteria are addressed but laid out confusingly across two webpages, which overlap in some respects but not others.
17 Zurich (Vulnerable customers) Zurich (FV)	Yes (1) States that Zurich will engage with customers to discuss and agree on safe ways to communicate and record these on the customer's file, including whether communication should involve third parties such as lawyers or social workers. Also mentions that Zurich will take measures to ensure information is kept confidential, but does not refer to which mechanisms and technology will be used.	Partly (0.5) States that all staff will be provided with vulnerable customer training and that vulnerable customers will be appointed an 'appropriately trained staff member', but neither provides details on the nature of training. In addition, the policy does not refer to early recognition and makes several references to customers 'self-identifying' as being	Yes (0.5) States information required to be provided will be minimised 'where reasonable' and customers will be speaking to one staff member where possible. In addition, a customer self-identifying as being affected by family evidence will trigger the requirements of the policy, without any further evidence needed.	Partly (0.5) States that customers self-identifying as being affected by family violence will be asked what their financial situation is and referred to specialist financial hardship services as appropriate. However, it does not specify what kinds of financial help may be given. A separate webpage for 'Customers	No (0) Not referred to in the policy. Only states that a copy of the publicly available Family Violence Policy will be provided to customers 'upon request'.	Yes (1) Policy states that customers will be referred to specialist external family violence and financial hardship services as appropriate. In relation to employees, those affected will be provided with 'support and training' including an employee assistance line, line management or human resources	Yes (1) Mentions that the aforementioned support and training will be provided to staff who are affected by dealing with vulnerable customers.	No (0) Not mentioned at all.	No (0) Not mentioned at all.	Yes (1) Provides a link to the webpage for lodging complaints if a customer is 'dissatisfied with Zurich's management of their vulnerability'. This other page also contains a further link to Zurich Australia's complaints policy which is available in various languages.	No (0) Not mentioned at all.	5.5/11* A rather brief and concise policy (set out on a single A4 page) which does well in some areas but poorly in others, in particular the provision of information/ material, reassuring customers that their situation will not affect their claim, taking domestic violence into consideration when designing products and monitoring of the policy. Also suggests

⁶ Medibank provides links to the Family Violence Policy of Swiss Re as well as Greenstone Financial Services

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		affected, suggesting that the onus is on the customer to notify Zurich of their circumstances.	Reasonable is undefined.	experiencing vulnerability' links to a number of support services including financial support.		discussions and resource documents.						customer bears onus to self-report instead of training employees to recognise early signs. * Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 5/11.