

## Purpose and Authority

This Family Violence Policy sets out Eric Insurance Limited's (eric) Policy on family violence as required under the General Insurance Code of Practice (the Code).

eric is a signatory to the Code, which requires general insurers to have arrangements in place to support customers facing family violence. This is outlined in the Code requirements.

We encourage customers who are facing family violence and are finding it difficult to interact with eric regarding their insurance needs, to reach out to us either by phone or email.

## Definitions

ACCC	Australian Competition and Consumer Commission
ASIC	Australian Securities and Investments Commission
EAP	Employee Assistance Program
eric	Eric Insurance Limited
the Code	General Insurance Code of Practice
the Code	Provisions under the General Insurance Code of Practice
CLO	Chief Legal Officer of Eric Insurance Limited

## Objectives of this Policy

This Policy covers the following areas:

- making sure that safety is paramount for anyone affected by family violence;
- early recognition of family violence;
- training to improve employees' responses to someone affected by family violence;
- protecting private and confidential information of customers affected by family violence;
- minimising the number of times a customer affected by family violence needs to disclose information about their family violence situation;
- ensuring appropriate and sensitive claims handling processes for claimants affected by family violence;
- ensuring collection arrangements are handled sensitively;
- arranging access to Financial Hardship support;
- informing customers, employees, distributors and service suppliers about information and assistance available to people experiencing family violence;
- referring customers, employees and distributors to specialist services; and
- supporting employees affected by family violence or experience vicarious trauma after serving affected customers.

## What is Family Violence?

In Australian law, 'family violence' is defined as: *violent, threatening or other behaviour by a person that coerces or controls a member of the person's family . . . or causes the family member to be fearful.* (Family Law Act 1975 (Cth), section 4AB).

Family violence means much more than physical violence. It can include:

- emotional abuse;
- psychological or mental abuse;
- sexual abuse;
- financial or economic abuse;
- stalking;
- physical assault; or,
- threats to harm.

## Training provided to recognise the signs of Family Violence

As customers affected by family violence may be reluctant or unable to disclose their circumstances, eric's employees and distributors have been provided with training to develop the skills to help them identify signs that may indicate a customer is affected by family violence.

Those signs are, for example, when someone:

- appears, or sounds, distressed or scared;
- is seen, or heard, to be taking instructions from their partner;
- remains silent while another party does all the talking;
- does not understand, or is not aware, that a policy has been taken out in their name or covering their property;
- asks questions about a joint policyholder's behaviour or activities;
- has concerns about protecting their personal privacy or safety, or the security of their policies;
- is reluctant to involve the joint policyholder when making changes to the policy, making a claim, or seeking financial hardship assistance;
- changes their address frequently;
- does not want their physical address recorded;
- is consistently late with premium payments; or,
- discloses the existence of any past or present family violence, or an intervention order or its equivalent.

## Protecting customers private and confidential information

eric has in place processes to manage a customer's private information, as outlined in our OP 9- Privacy Framework, and our Privacy Policy available on our website.

eric will ensure that we confidentially handle customers information and do not disclose personal information of a customer going through family violence, unless we are directed to do so by them.

Outlined below is how eric ensures personal information remains confidential:

- ensure physical address is not disclosed to another party unless authorised by the customer. We need to be mindful of this when dealing with joint policies.
- take effective notes on our system to flag a customer going through family violence.
- ensure our distributors are aware of our Privacy Policy.

- distributors are to be made aware of requirements under this policy, which includes, ensuring that a customer's personal information including physical address is not disclosed to a third party, unless authorised by the customer.

We will address privacy and confidentiality concerns for a customer affected by family violence, by:

- ensuring we have systems in place to keep the customer's contact information secure and confidential;
- treating all customer information as sensitive;
- ensuring that any protection put in place applies across all the policies the customer holds by:
  - o asking the customer if they have more than one policy or account that needs to be amended due to family violence
  - o proactively searching for other policies in the customer's name
- giving the customer access to personal information held about them within a reasonable timeframe;
- giving the customer control over how their personal information is shared with third parties;
- discussing safe ways to communicate with the customer and recording the plan on their file, for example; asking them whether it is a good time to talk or if it's safe to leave phone messages;
- supporting the customer to set up new insurance policies;
- agreeing to requests from joint policyholders who ask for policy communication and information to be sent to two different addresses, whether physical or by email;
- understanding the legal requirements if the customer affected by family violence and the perpetrator are joint policyholders. This can be done by referring such matters to the CLO or Privacy Officer;
- ensuring the customer is informed about the circumstances and nature of information that must be shared with the perpetrator so that they can make arrangements accordingly; and
- protecting the details of employees in situations where they may have to contact the perpetrator.

### Minimising the need for customers to repeat disclosure of their Family Violence situation

It is important to minimise the number of times a customer must repeat the disclosure of their family violence situation because doing so can have a traumatising effect through them reliving their experiences.

A customer may not always be in a position to talk about their circumstances. This may be because the perpetrator is present, may be monitoring the customers call and/or monitoring their internet usage, and may be monitoring their mobile phone access.

To ensure that employees manage this effectively, eric will do the below:

- where possible the customer will deal with the same employee
- employees of eric will ensure that effective note taking is being adhered to
- notes are to be read before speaking with a customer
- work with the customers authorised agent, for example, a social worker if required
- refer to a qualified and independent interpreter to assist with communication if the customers second language is English.

## Sensitive claim handling

If a customer affected by family violence makes an insurance claim, then employees need to handle the claim with sensitivity, flexibility and care. This is particularly important if the customer and the perpetrator are joint policyholders, or the perpetrators behaviour has resulted in the need to make a claim.

To ensure that employees manage this effectively, eric will:

- clearly and transparently explain to the customer the claims process and what is required of them;
- escalate these claims to a team leader for review as soon as possible;
- ensure that effective and clear notes are documented, and the customer is advised of what is noted in their account to ensure the customer is not required to repeat their story;
- ask the customer how best they would like us to manage the claim and where appropriate, gather alternate contact details for the customer;
- consider that if a customer does not reply to communications, it may be because they do not have access to phone or email;
- be aware that customers may not have immediate access or capacity to respond to our requests for information and will adjust our timeframes to suit each circumstance;
- ensure that any claim payment is made to the appropriate party or parties;
- not require the customer to make direct contact with the perpetrator or lodge a police report about the perpetrator unless they are comfortable to do so; and,
- make any investigators aware of the customer's situation as well as ensure the investigator is aware of any possible danger. Eric will ensure the investigator is trained according to the CODE investigation standards.

## Access to Financial Hardship

Family violence may lead to financial hardship for the customer. If this is the case, then the requirements under eric's Financial Hardship Policy will be followed.

eric's Financial Hardship Policy is available on our website. In addition to the Code requirements under Financial Hardship the below will be done to assist customers facing family violence:

- Fast track their financial hardship request;
- In case of joint policyholders, Financial Hardship will be applied without seeking the consent of the other policyholder;
- eric will be aware that the customer's reluctance to obtain consent from a joint policyholder in relation to Financial Hardship help may be the first indication of financial abuse;
- where possible minimise the information and documents a customer is to provide; and,
- not require an intervention order as evidence of family violence.

## Collection arrangements

If eric becomes aware that a customer's debt involves a family violence situation, we will not refer the debt to a third-party debt collection agency.

If eric becomes aware of the family violence situation after the debt has been referred or sold to a third-party debt collection agency, then we will work with the agency to ensure the best outcome for the customer. This will be assessed on a case-by-case basis.

eric understands the risks involved with attempting to recover debts whether from the customer experiencing family violence or from the perpetrator.

All collection agencies are required to comply with the Code's *Debt collection guideline: for collectors and creditors* published by ACCC and ASIC.

## Making customers affected by family violence aware of information and help available

eric understands that customers affected by family violence need to be able to quickly access information about their policies. Customers can call us on 1800 999 977 to access their policy information.

eric has made available on our website:

- information for our customers about our Family Violence Policy;
- notification to customers that they can access our internal Family Violence Policy if needed; and,
- contact numbers for where they can seek further help.

## Referring customers affected by family violence to specialist services

When dealing with family violence it is important that our customers get the required help and support they need.

While at eric we are here to speak to them (about their situation), the below organisations will be able to provide professional assistance. Customers can be referred to these agencies. See appendix 1 for a list of family violence specific agencies across all states.

Organisation	Website	Phone number
1800RESPECT	<a href="http://www.1800respect.org.au">www.1800respect.org.au</a>	1800 732 732
Lifeline	<a href="http://www.lifeline.org.au">www.lifeline.org.au</a>	12 11 44
Mensline Australia	<a href="http://www.mensline.org.au">www.mensline.org.au</a>	1300 789 978
Beyond Blue	<a href="http://www.beyondblue.org.au">www.beyondblue.org.au</a>	1300 224 636
National Centre for Suicide Prevention	<a href="http://www.suicidefirstaid.org.au/">www.suicidefirstaid.org.au/</a>	1300 60 80 95
Domestic and Family Violence	<a href="http://www.dss.gov.au">www.dss.gov.au</a>	1800 00 055
National Association of Community Legal Centres	<a href="http://www.clcs.org.au">www.clcs.org.au</a>	02 9264 9595
No to violence- Men's referral service	<a href="http://www.ntv.org.au">www.ntv.org.au</a>	1300 766 491

## Support for employees

eric understands that dealing with family violence cases may trigger their own experience or experience of someone they know and impact them. eric has available a separate Employee Family Violence Policy for employees who may be facing such a situation. eric also provides Employee Assistance Program (EAP) services for our employees as outlined in the internal Employee Family Violence Policy.

## Appendix 1- List of family violence agencies

### Australia-wide

- Kildonan UnitingCare
- 1800 RESPECT
- Domestic and Family Violence Response Training

### Australian Capital Territory

- Legal Aid ACT New South Wales
- NSW Health Education Centre Against Violence
- Women's Domestic Violence Court Advocacy Service
- Gendered Violence Research Network, UNSW
- Ask LOIS (Women's Legal Service NSW)
- LawAccess

### NSW

- Legal Aid NSW

### Northern Territory

- Northern Territory Legal Aid Commission

### Queensland

- Queensland Centre for Domestic and Family Violence Research
- Legal Aid Queensland

### South Australia

- Legal Services Commission of South Australia Tasmania
- Legal Aid Commission of Tasmania Victoria
- Domestic Violence Resource Centre Victoria
- Victoria Legal Aid

### Western Australia

- Women's Council for Domestic and Family Violence Services
- Legal Aid WA