

## FAMILY VIOLENCE POLICY

**The paramount priority of our Family Violence Policy is that whenever family violence is identified or suspected, the safety of our customer affected by family violence and their family is protected.**

Point Underwriting Agency keenly supports the standards set out in the General Insurance Code of Practice. In particular, the standards relating to customers and others who are experiencing vulnerability, including those affected by 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".

Our Family Violence Policy ensures that our team are adequately trained:

- To identify, support and avoid harm to customers affected by family violence; and
- To protect private and confidential, and personal information of customers affected by family violence. In particular, to ensure that our customer's physical address is secure and not at risk of deliberate or inadvertent disclosure; and
- To minimise the number of times customers affected by family violence need to disclose information about family violence.

Our Family Violence Policy also ensures that Point Insurance will:

- Not disclose any information shared with us about family violence with the perpetrator and ensure that this information is only accessible to authorised employees; and
- Provide help to claimant's who are affected by family violence, including those affected by financial hardship and that and claim involving family violence will be assessed with priority and promptly escalated to a senior manager; and
- Be able to easily identify internally if a customer has been affected by family violence to ensure any interactions with the affected customer are handled by senior employees with priority and sensitivity; and
- Provide customers with the necessary contact details of services who specialise in family violence; and
- Have the necessary support in place for employees who are affected by family violence.

As customers affected by family violence may be reluctant or unable to disclose their circumstances, our employees have been trained to identify the signs that may indicate a customer is affected by family violence.

In particular, our staff have been trained to look out for various signs from our customers that could include:

- 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 cover has been taken out in their name or covering their property;
- Asks questions about a joint policy holders' behaviour or activities;
- Has concerns about protecting their personal privacy or safety, or the security of their policies;
- Is reluctant to involve the other joint policy holder 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;
- Discloses the existence of any past or present family violence, or an intervention order or its equivalent.

It should be noted that our Employees will not require evidence of an intervention order to trigger the requirements of our family violence policy. If a customer self-identifies to our employee as being affected by family violence or the employee identifies that the customer may be affected by family violence, this will be sufficient for us to trigger our Family Violence Policy.

---

## Protecting Private and Confidential Information

As an insurer, we need to provide for the secure and confidential handling of private, confidential, and personal information about customers affected by family violence in order to protect their safety. Our customers need to have confidence that such information — particularly their physical address — is secure and not at risk of deliberate or inadvertent disclosure.

In order to ensure that we do not enable a family violence perpetrator to find out the physical address of a customer, we will ensure that we:

- Only have the customer's email address accessible to authorised Point employees; and
- Have the customer's physical address password protected and only accessible by authorised employees

The Code requires insurers to protect the right to privacy of vulnerable customers who have notified the insurer of their need for additional support from someone else (for example, a lawyer, consumer representative, interpreter or friend).

To ensure that we are adequately addressing privacy and confidentiality concerns of a customer affected by family violence, we will:

- Ensure that we have systems in place to keep our customer's contact information secure and confidential;
- Treat all information about the customer as sensitive information;
- Ensure that any protection put in place applies across all the policies the customer holds by — in particular:
  - i. asking the customer if they have more than one policy or account that needs to be amended due to family violence; and
  - ii. proactively searching for other policies in the customer's name;
- Give the customer access to personal information held about them within a reasonable timeframe;
- Give the customer control over how their personal information is shared with third parties;
- Discuss safe ways to communicate with the customer — for example: asking them:
  - whether it is a good time to talk; or
  - if it is safe to leave phone messages;
- Support the customer to set up new insurance policies if required;
- Ensure the customer is informed about the circumstances and nature of information that may have been shared with the perpetrator so that they can make arrangements accordingly;
- Protect the details of employees in situations where they may have to contact the perpetrator.

---

### **Minimising the Need for Customers to Repeat Disclosure**

It is important to minimise the number of times a customer has to repeat the disclosure of their family violence situation because:

- Doing so can have a traumatising effect through them reliving their experiences; and
- They may not always be in a position to talk about their circumstances — for example, because the perpetrator may be:
  - i. present;
  - ii. monitoring their call; or
  - iii. monitoring their web and mobile phone access.

To make sure that we are minimising the need for a customer experiencing family violence to have to repeatedly disclose their information, we will:

- Whenever possible, enable the customer to deal with the same employee each time; and
- Provide copies of documents to the customer without charge to help resolve matters, or for legal purposes; and
- Work with the customer's agent or representative — for example, a professional financial counsellor, lawyer, community services or social worker, legal aid officer or family violence specialist.

## Sensitive Claims Handling

If a customer affected by family violence makes a claim, our employees are trained to handle the claim with sensitivity, flexibility and care. This is particularly important if:

- The customer and the perpetrator are joint policyholders; or
- The perpetrator has caused the claim — for example, by causing physical harm.

To make sure that our employees handle claims with flexibility and care, we shall adopt the following:

- Clearly and transparently explain to the customer the claims process and what is required of them; and
- Have specialist employees with adequate authority to make decisions in family violence-related claims.

In addition, we will ensure our staff:

- Understand and acknowledge that the claims process itself can trigger family violence; and
- Take into account that if the claimant does not reply to communications, it may mean that they do not have safe access to telephone or email; and
- Understand that a person affected by family violence may not have access to their personal or financial records; and
- Before paying a claim, we will ensure that we are paying the appropriate party and to their appropriate bank account.

---

## Access to Financial Hardship Help

Point understands that family violence is relevant to Financial Hardship assistance because it is a potential cause of payment difficulties and it is an eligibility criterion for access to Financial Hardship support under the Code of Practice.

If a customer identifies to an employee that they are being affected by family violence, then we will:

- Ask for further details about the customer's financial situation;
- Fast-track our assessment of the customer's Financial Hardship request;
- Provide options for the customer to retain their policy if they say they cannot pay their premium;
- Ensure our policies about assessing Financial Hardship involving joint policyholders are appropriate given the situation;
- Where possible, we will minimise the information and documents that customers are required to provide to substantiate their financial hardship claim;
- When assessing a Financial Hardship application, we will not require an intervention order as evidence of family violence — instead, if the insurer identifies that the customer is affected by family violence or the customer discloses this information, that will trigger a referral to an appropriate employee.

## Collection Arrangements

If we are aware that a customer's debt involves a situation of family violence, then we are not permitted to refer or sell the debt onto third-party debt collection agencies.

If we become aware that family violence is involved in a debt after we have referred or sold that debt to a third party collection agency, then we must work with the collection agency to provide the best outcome for the customer.

## Family Violence Specialist Services

Point is committed to help reduce the impact of family violence on our customers and their families. However, it is important to highlight that our employees are not social workers or experts in family violence. Therefore, our ability to assist is limited to the scope of providing insurance coverage and settling insurance claims. Whilst we will always do our best to recognise, support and protect those individuals impacted by family violence, we strongly recommend that any impacted individuals contact the relevant support services in their states, as follows:

<b>Australia Wide Services</b> <ul style="list-style-type: none"> <li>• Kildonan UnitingCare</li> <li>• 1800 RESPECT</li> <li>• Domestic and Family Violence Response Training</li> </ul>	
<b>Australian Capital Territory</b> <ul style="list-style-type: none"> <li>• Legal Aid ACT</li> </ul>	<b>New South Wales</b> <ul style="list-style-type: none"> <li>• NSW Health Education Centre Against Violence</li> <li>• Women's Domestic Violence Court Advocacy Service</li> <li>• Gendered Violence Research Network, UNSW</li> <li>• Ask LOIS (Women's Legal Service NSW)</li> <li>• LawAccess NSW</li> <li>• Legal Aid NSW</li> </ul>
<b>Victoria</b> <ul style="list-style-type: none"> <li>• Domestic Violence Resource Centre Victoria</li> <li>• Victoria Legal Aid</li> </ul>	
<b>Western Australia</b> <ul style="list-style-type: none"> <li>• Women's Council for Domestic and Family Violence Services</li> <li>• Legal Aid WA</li> </ul>	
<b>Northern Territory</b> <ul style="list-style-type: none"> <li>• Northern Territory Legal Aid Commission</li> </ul>	<b>Queensland</b> <ul style="list-style-type: none"> <li>• Queensland Centre for Domestic and Family Violence Research</li> <li>• Legal Aid Queensland</li> </ul>
<b>South Australia</b> <ul style="list-style-type: none"> <li>• Legal Services Commission of South Australia</li> </ul>	<b>Tasmania</b> <ul style="list-style-type: none"> <li>• Legal Aid Commission of Tasmania</li> </ul>

### **Support for Point Employees**

We also recognise that our employees may be affected by family violence (whether that be their own personal experience or as a result of a dealing with a customer who is suffering from family violence) and require support in the same way that our customers do.

Any staff member affected by family violence should know that we are here to help and support you and we encourage you to raise any family violence issues, including any applicable leave applications confidentially with our Family Violence Officer.