

## **FAMILY VIOLENCE & SUPPORTING VULNERABLE CUSTOMERS POLICY**

### **1. PURPOSE**

This Family Violence & Supporting Vulnerable Customers Policy (Policy) has been developed to comply with The Insurance Council of Australia's (ICA) General Insurance Code of Practice (the Code) and sets out how Allstate Insurance Pty Ltd (Allstate) identifies and supports vulnerable Customers, including those affected by Financial Hardship and Family Violence.

For the purposes of this Policy, any reference to "Customers" includes customers of Allstate Underwriting Agency Pty Ltd (**Allstate**) as well as any other individual entitled to Financial Hardship support under the Code. This could include individuals who we are seeking to recover money from as we believe they have caused damage to an insured Customer.

This Policy forms part of Allstate's Compliance Management System which represents the entire suite of policies and procedures that fulfil Allstate's legal and regulatory requirements.

Allstate is committed to exercising greater care when dealing with vulnerable Customers. A person may be vulnerable due to a range of factors, including:

- a) age;
- b) disability;
- c) mental health conditions;
- d) physical health conditions;
- e) family violence;
- f) language barriers;
- g) literacy barriers;
- h) cultural background;
- i) Aboriginal or Torres Strait Islander status;
- j) remote location; or
- k) financial distress.

### **2. POLICY STATEMENT**

Allstate has a commitment to conducting its business with honesty and integrity and remains committed to informing Customers, employees, distributors and service suppliers about information and assistance available to vulnerable people, including those experiencing Financial Hardship and Family Violence.

This policy and Allstate's internal policies and training programs assist employees to:

1. understand if a Customer may be vulnerable;
2. determine how best, and to what extent, they can support a vulnerable Customer;
3. take account of a Customer's particular needs or vulnerability; and
4. engage with a vulnerable Customer with sensitivity, dignity, respect and compassion. This may include arranging additional support and referring the Customer to specialised people or services.

### **3. 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 includes:

- emotional abuse, psychological abuse, sexual abuse, financial or economic abuse; and
- damage to property.

The way employees deal with Customers who may be affected by Family Violence should facilitate, rather than act as a barrier to identifying Family Violence and improve the experience of those affected by Family Violence.

The aim of this Policy is to ensure that whenever Family Violence is identified or suspected, the Customer feels supported in the ways set out below.

*"We would encourage you to make us aware of your situation so that one of our staff members who has appropriate training can assist you. "*

*"Allstate recognises that Family Violence is unacceptable in any relationship and Customers experiencing Family Violence will be treated with dignity and respect."*

The support of Customers experiencing Family Violence and their family is a priority. Customers who indicate or disclose Family Violence are able to access support from Allstate that is appropriate to their circumstances. *Please see nominated services suppliers at the end of this policy.*

#### **4. ASSISTING CUSTOMERS**

Allstate can assist Customers, including those experiencing Financial Hardship or Family Violence by:

- ensuring safe and confidential communication in light of individual circumstances;
- helping to set up new insurance policies;
- helping to arrange access to financial hardship support; and
- referral to specialist support services.

In circumstances where the issue is complex or unable to be dealt with by the person who took the call, it is to be immediately referred to the Family Violence and Vulnerable Customer Support Officer

The Customer must be informed of this action.

#### **5. INTERPRETERS**

If a Customer informs Allstate of their need for an interpreter, or we identify such a need, the Family Violence and Vulnerable Customer Support Officer will direct the Customer to the relevant government service that can provide interpreter services.

#### **6. IDENTIFICATION**

If a Customer requires support to meet identification requirements, the Family Violence and Vulnerable Customer Support Officer will take reasonable measures to provide such support.

#### **7. FINANCIAL HARDSHIP**

Financial Hardship occurs when Customers experience difficulty in meeting their financial obligations to Allstate or our business partners.

The support Allstate can offer does not include support with paying the premiums under an insurance policy that has been issued via Allstate.

If a Customer informs, or we identify, that they are experiencing Financial Hardship, we will provide them with:

- a copy of our Financial Hardship Application Form; and
- if appropriate, contact details for the National Debt Helpline - 1 800 007 007.

### **7.1 Assessing Requests for Financial Hardship Support**

When assessing requests for Financial Hardship support, Allstate will consider all reasonable evidence, including:

- evidence of serious illness that prevents the Customer from earning an income;
- evidence of a disability, including a disability caused by mental illness;
- Centrelink statements; and
- evidence of unemployment.

If Allstate requires additional information after receiving the application, the Family Violence and Vulnerable Customer Support Officer will inform the Customer of the information required as soon as possible. The Customer will have 21 Calendar Days from the day of the request to provide the additional information unless an alternative timeframe has been agreed.

### **7.2 Putting Recovery on Hold**

If Allstate is taking action to recover an amount from a Customer, the action will be put on hold if the Family Violence and Vulnerable Customer Support Officer identifies the Customer is experiencing Financial Hardship or if the Customer requests Financial Hardship support in relation to that amount.

When putting the action on hold, the Family Violence and Vulnerable Customer Support Officer will contact any collection agent or lawyer we have appointed and inform them the action is on hold. The action will remain on hold until Allstate has assessed the Financial Hardship application and the Family Violence and Vulnerable Customer Support Officer will notify the Customer of the decision.

### **7.3 Making our Decision**

Allstate's Family Violence and Vulnerable Customer Support Officer will inform the Customer in writing of our decision about whether to give Financial Hardship support within 21 Calendar Days of receiving the application, unless Allstate has requested additional information.

### **7.4 Customers Entitled to Financial Hardship Support**

If Allstate determines a Customer is entitled to Financial Hardship support, we will work with the Customer to implement an arrangement that could include any one or more of the following:

- delaying the date on which payment must be made;
- paying in instalments;
- paying a reduced lump sum amount;
- delaying one or more instalment payments;
- deducting the excess from the claim amount paid.

### **7.5 Customers Not Entitled to Financial Hardship Support**

If Allstate determines a Customer is not entitled to Financial Hardship support, the Family Violence and Vulnerable Customer Support Officer will inform them of the reasons for the decision and about our Complaints & Disputes process.

## **8. PROTECTING PERSONAL INFORMATION**

At all times and in accordance with Privacy laws and Allstate Privacy policies, we will ensure the secure and confidential handling of private, confidential, and personal information about vulnerable Customers, including those affected by Family Violence, in order to protect their safety.

This will enable Customers to have confidence that such information is secure and not at risk of deliberate or inadvertent disclosure.

Allstate is committed to protecting the right to privacy of vulnerable Customers who have notified us of their need for additional support from someone else, for example, a lawyer, consumer representative, interpreter or friend if, previously authorised to do so by the customer.

## **9. TRAINING**

Training is tailored to all employee roles within the business and the degree of contact they have with Customers.

Allstate will aim to ensure that all employees and third-party providers have access training and documentation and receive ongoing updates & training so that they:

- are aware of Allstate policies and procedures when they are engaging with vulnerable Customers;
- identify vulnerable Customers, including those affected by Family Violence;
- deal appropriately and sensitively with vulnerable Customers; and
- apply the Family Violence & Supporting Vulnerable Customers policy and related policies and procedures relevant to their role in dealing with Customers.

Training is aimed at assisting employees to reduce the impact of vulnerability and Family Violence on Customers.

### **9.1 Service Suppliers**

Allstate will ensure that service suppliers who deal directly with Customers, such as claims handlers, agents, loss assessors, investigators and claims management services have access to and are provided with training and documentation to the same level as our employees.

## **10. REPORTING**

Any notification of Financial Hardship received by Allstate must be reported via the Financial Hardship Application Form to the Family Violence and Vulnerable Customer Support Officer

### **SUPPORT SERVICES AND RESOURCES**

#### **Agency Phone Website Services available**

#### **1800 RESPECT**

1800 737 732

<http://www.1800respect.org.au>

National 24-hour Domestic & Family Violence and Sexual Assault Line.

#### **Beyond Blue**

1300 224 636

<https://www.beyondblue.org.au/>

24/7 support to people experiencing anxiety or depression.

#### **Lifeline 13 11 14**

<https://www.lifeline.org.au>

24/7 counselling & referral service for people in a crisis situation.

#### **MENSLINE**

1300 789 978

<https://mensline.org.au/>

24/7 support, information and referral service for men with family and relationship issues.

#### **National Association of Community Legal Centres**

<https://clcs.org.au/>

An independent not-for-profit community organisation that provides legal and related services to the public, focusing on the disadvantaged and people with special needs.



**National Debt Hotline**

1800 007 007

<https://ndh.org.au/>

Financial counselling is a free, confidential service to assist people in financial difficulty.