

SNAPSHOT REPORT

Supporting victims of family and domestic violence

May 2024


Acknowledgement of country

We acknowledge the traditional owners of Country throughout Australia and pay our respects to Elders past and present.




Contents

Family and domestic violence policies	5
What we did	6
What we found	7
Website accessibility	7
Support offered	7
What we expect	10
What we recommend	12
Spotlight: The One Stop One Story Hub	13
Case study	14
Resources	15
Next steps	15



This report shares our findings on how life insurers that subscribe to the Life Insurance Code of Practice (the Code) are meeting their obligation to support victims of family and domestic violence (FDV). We also share good industry practice, areas for improvement and encourage life insurers to continue to develop processes, practices, and policies that extend beyond the base level required by the Code.





Family and domestic violence policies

Family violence is a whole community issue and requires the collective efforts of governments, communities, and the corporate sector, including life insurers, to respond to the challenges.

Over three million Australian adults have experienced some form of family and domestic violence since the age of 15¹. FDV can take various forms and can affect anyone. It can be physical abuse defined as violent, threatening, or other behaviour that controls or intimidates a family member. It can also include emotional, psychological, sexual, and financial abuse, along with threats of abuse, and damage to property and animals within a family or domestic context.

Life insurance is an important financial protection for many people. However, life insurance policies can be used as a form of economic abuse and coercive control to inflict financial and emotional harm by perpetrators of family violence². For example, a life insurance policy could be taken out by an abuser without the consent or knowledge of the victim, followed by threats to take the victim's

life for financial gain. Or the inability to split joint life insurance policies without the consent of both parties could create a mechanism for post-separation abuse to continue.

With these risks in mind, transparency on the life insurer's policy and the support they can offer victims can go a long way to encourage customers to seek help when they need it. Being transparent about the support available can help build a customer's confidence to engage and help them feel assured that their life insurer genuinely cares about their wellbeing. Openly sharing information about FDV support can help reduce the stigma associated with such situations. Victims may feel less isolated knowing their life insurer understands the issues and is committed to providing assistance. Transparency also enables victims to make more informed decisions about next steps. By understanding the support available, victims can better assess their options, plan for their safety, and take action that aligns with their particular circumstances.

1 Australian Institute of Health and Welfare: Family Domestic and Sexual Violence in Australian 2021-2022

2 https://survivingeconomicabuse.org/wp-content/uploads/2023/11/Life_insurance_briefing-SEA-2023.pdf

What we did

Code clause 6.6 states: We will have a publicly available policy on our website about how we will support you if you are affected by family violence.

The 2023 Code came into effect on 1 July 2023, introducing new obligations for vulnerable customers. This includes the obligation for life insurers to provide on their website a publicly available family violence policy that sets out how they will support people experiencing FDV.

Our review conducted during August to December 2023, examined how life insurers were meeting this commitment, providing valuable insights into good practice and areas requiring further improvement.

16 
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We conducted a desktop review of 16³ life insurers' websites to identify and review their publicly available FDV policies. We considered:

- public availability of the life insurer's FDV policy on their website
- clarity of the policy
- the range of support offered.

³ Life insurers refers to 16 life insurance providers that are voluntary signatories to the Code and issue life insurance policies.

What we found



Website accessibility

All but one life insurer published FDV policies on their websites. Policies were relatively easy to locate on “additional support” pages or via the website’s search engine. The websites were also compatible with mobile devices, ensuring that the information could be accessed via smartphones or other devices.

The one life insurer that was non-compliant with the obligation, promptly addressed the matter following our engagement with them. Their policy is now published on their website, and they have taken proactive steps to enhance staff awareness of the policy.

Seven out of 16 life insurers had their policies in a PDF format on their website. This significantly limits accessibility for some customers, particularly those with vision impairments or other accessibility issues. PDF documents are not always compatible with screen readers or other assistive technologies. PDFs may not allow users to resize text or adjust other display settings. This can lead to a less-than-optimal experience on smaller screens, such as those on mobile devices.



Support offered

While all life insurers’ policies set out the support they offer customers impacted by FDV, there were varying levels of maturity among the policies reviewed. Some life insurers set out a far more comprehensive range of support options. We appreciate that each life insurer is different, and that the scale of operations, capacity and capability will vary. Below we list the support set out in the policies reviewed. We encourage all subscribers to reflect on these options and whether there is more they can do to enhance their approach.

7 out of **16**



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1. Privacy and confidentiality

- Reassure the customer that any information they provide will be kept confidential.
- Make sure the customer's contact information is secure and confidential.
- Ensure that communication is only done via the customer's preferred communication method and that staff will discuss the preferred channel with the customer.
- Give the customer, where possible, control over how their personal information is shared with third parties.
- Engage with the customer's nominated support person. For example, financial counsellor, lawyer, community services or social worker, legal aid officer, family violence specialist or other service provider.
- Inform the customer about what information needs to be shared with other policy holders so that they can make informed decisions and put appropriate arrangements in place.
- Not require the customer to make any contact with the alleged perpetrator.



2. Training and specialisation

- Dedicated specialist team.
- Specialist case managers and where possible provide the customer with consistency in speaking to one staff member, or a single pathway for escalation.
- Relevant staff are trained on how to identify and respond to disclosures of family violence with dignity, respect and care.
- Ensure that the service providers the life insurer works with who deal directly with customers have training programs in place to handle situations with appropriate sensitivity.
- Minimise the number of times the customer needs to disclose their situation.
- Refer the customer to expert external support services.



3. Flexibility and prioritisation

- Help set up a new policy – if required.
- Maintain policy oversight.
- Prioritise claims or complaints.
- Minimise what information is required or assist customers to obtain the information that they need.



4. Financial hardship support

- Deferred or reduced payments for premiums.
- Reduce or waive excess payments.
- If the customer has a debt due to an accident with one of the life insurer's customers, the life insurer may keep the debt in-house, buy back the debt if it's with a debt collector, or defer or waive payments owed.
- Assess features of the cover that may assist with affordability.



Some insurers' policies also set out a range of other commitments that extended beyond the direct support they can provide to their customer...

Some insurers' policies also set out a range of other commitments that extended beyond the direct support they can provide to their customer, and speak to their commitment to continual improvement, including:

- Working with industry bodies and consumer groups to refine their approach to support customers affected by FDV.
- A commitment to review the FDV policy at a minimum of every three years.
- Articulating their commitment to support employees experiencing FDV.

What we expect

All life insurers must have a current FDV policy on their website, setting out how they will support customers experiencing FDV.

The FDV policy must assist customers to understand the support available and how it can be accessed. This includes, but is not limited to:

- the purpose of the policy
- a description of the support available
- how to access the support (providing multiple contact channels where possible).

At a minimum, all information detailing FDV support should be:

- easy to read and understand and framed with the customer in mind
- accessible from the home page of the life insurer's website including by using keywords like 'domestic violence' or 'family violence' in the website's internal search engine.



Policies should be reviewed at least every 3 years



It is essential that life insurers regularly review their policies to ensure their practices remain contemporary.

Responses and support will continue to develop and evolve. It is essential that life insurers regularly review their policies to ensure their practices remain contemporary. Policies should be reviewed at least every three years.

Chapter six of the Code sets out how life insurers will support customers experiencing vulnerability or financial hardship. This includes a commitment to take extra care to support vulnerable customers and treat people with empathy, compassion and respect. Within the context of family violence, it is our expectation that life insurers ensure that all relevant staff receive appropriate training to identify potential indicators of family and domestic violence and are able to engage appropriately.



The Code requires life insurers to ensure that their distributors' processes and procedures are consistent with good customer outcomes and the Code's relevant obligations that apply to the activities they have been contracted to perform (clause 2.21).

Though a review of the websites of distributors of life insurance products was outside the scope of this work, we noted that some distributors displayed the life insurer's FDV policy while others did not.

The Code requires life insurers to ensure that their distributors' processes and procedures are consistent with good customer outcomes and the Code's relevant obligations that apply to the activities they have been contracted to perform (clause 2.21). If a life insurer's distributor is dealing with customers, then they should also be making the FDV policy available on their website in addition to ensuring relevant staff are sufficiently trained to identify and support people experiencing FDV.

We recommend all subscribers review the practices of their distributors (where appropriate) and ensure they are compliant with the Code. We plan to extend our review of compliance with Clause 6.6 to distributors during our next review.



Reminder: we remind life insurers that they must notify us upon becoming aware of a significant breach of their Code obligations.

What we recommend

We recommend that all subscribers draw on the good practice examples below to improve their approach beyond the base level required by the Code.

These good practice examples are taken from our desktop review. Where possible life insurers are encouraged to engage specialist family and domestic violence expertise to review and refine their approach.

- ✔ Make it prominent and clear that people should call 000 if they or a family member are in immediate danger or in an emergency. Very few subscribers presented this information up-front on the website landing page or in their policies.
- ✔ Utilise 'Quick Exit' buttons on websites. This feature is easy and low cost to add and allows for swift navigation away from websites in the event of interruptions by a perpetrator. Upon clicking, it re-directs users to a general page, such as Google or other commonly used web pages. The page will not appear in the browser history. Currently only two life insurers provide quick exit buttons on their websites. This needs to be adopted more broadly.
- ✔ Provide active links to specialist family violence support services.
- ✔ Enhance accessibility. Use HTML for web pages whenever possible. If using PDFs ensure they are created with accessibility features in mind, such as proper tagging, alternative text for images, and logical reading order. Additionally, testing PDFs with accessibility tools can help identify and address potential issues. All subscribers should be aspiring to meet the [World Wide Web Consortium \(W3C\)](#) international web standards for accessibility.
- ✔ A small number of policies provided customers with additional guidance around key areas of potential interest to customers experiencing family and domestic violence, in particular:
 - › Holding and changing a joint policy
 - › Beneficiaries and the payment of claims

Providing additional information around these areas, can help clarify for customers the options available to them.

Spotlight

The One Stop One Story Hub

The One Stop One Story Hub (OSOS Hub) is a program developed by the [Thriving Communities Partnership](#). This digital platform assists frontline workers in referring clients experiencing family and domestic violence and general hardship situations to support service providers.

The OSOS Hub provides a seamless process for people requiring support, reducing the burden and complexity of contacting each service provider individually. The Hub's online portal enables customers or their representatives to inform service providers of family violence, or vulnerabilities, while ensuring privacy. The OSOS Hub enables people experiencing family violence and/or financial hardship to tell their story once and get access to support from multiple service providers.

A successful pilot program with several large corporate entities including Commonwealth Bank of Australia and Telstra, demonstrated its effectiveness. Expanding its use among other financial services firms, industry groups and regulators would be beneficial for many people experiencing family violence. Following the success of the pilot, a range of financial firms and service providers have signed up to the OSOS Hub.



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Case Study

WHAT HAPPENED:

One insurer undertook a comprehensive review of its policies and practices to understand the support provided to customers experiencing family and domestic violence, and to develop a better understanding of the needs of affected customers.

In its review, they engaged specialist family violence service providers and researchers. They also sought specialist legal advice.

Working with expert partners ensured that new policies were well-considered, contemporary and prioritised customer safety.

ACTION TAKEN:

The insurer simplified the policy for clarity, and reinforced safety as a priority.

It enhanced the policy to emphasise the support options for both employees and customers, including measures for people in debt.

They implemented extensive training programs and established a specialist team to support staff in identifying and assisting customers affected by family violence.

The insurer introduced privacy protection measures to safeguard sensitive information. And it set up initiatives such as joint policy separation and premium waivers to further assist customers.

The insurer collaborated with organisations like Uniting for additional support services for customers in need.

LESSONS LEARNED:

Successfully developing and operationalising an improved family violence policy was an organisation-wide effort that drew on support from all employees.

Collaboration with experts and relevant organisations were valuable and highlighted the importance of seeking subject matter expertise, legal advice and industry insights.

REFLECTIONS:

The initiative fostered employee engagement and empowerment, with frontline staff finding fulfillment in supporting customers impacted by family violence.

The insurer observed enhanced skills in active listening and critical thinking among staff which contributed to improved interactions with customers.

For customers, the timely support from their insurer meant that hundreds of people could retain dignity and respect as they navigated a difficult task.

LOOKING FORWARD:

The insurer remains committed to continuous improvement. It periodically reviews policies to ensure their effectiveness and keeps them updated.

It is also exploring opportunities to enhance support and protection in digital interactions, while considering how its ongoing research and partnerships can offer valuable insights.

In reiterating its dedication to supporting customers experiencing family and domestic violence, the insurer has begun initiatives to develop perpetrator response strategies and has examined the impact of coercive control legislation. It seeks to further develop its support mechanisms in the coming months and years.

Next steps

The Council of Australian Life Insurers (CALI) has committed to review and improve its FDV guidance for industry. We welcome this commitment and see it as an opportunity to improve practice within industry and deliver better outcomes for customers.



Resources

There are a wide range of resources available to better understand website accessibility, FDV challenges and best-practice responses. There are also many specialist organisations that can assist. Below is a small number of additional resources:

Centre for Accessibility Australia

www.accessibility.org.au/policy/website-accessibility/#website-accessibility-1

Surviving Economic Abuse

survivingeconomicabuse.org/wp-content/uploads/2023/11/Life_insurance_briefing-SEA-2023.pdf

White Ribbon Australia

www.whiteribbon.org.au/helplines

1800RESPECT

www.1800respect.org.au

Thriving Communities Partnership

www.thriving.org.au/what-we-do/the-one-stop-one-story-hub

