

Customer Domestic and Family Violence Policy

Resolution Life

We are a global in-force life
insurance specialist

1. At a glance

Who	This policy applies to all Australian/New Zealand/Australasia employees.
What	<p>This policy sets out how we deal with, and the support available to:</p> <ul style="list-style-type: none">• Resolution Life customers who are experiencing domestic and family violence, and• Resolution Life staff who are aware of a customer experiencing domestic and family violence. <p>For the purposes of this policy, 'customer' means an individual insured, a third-party beneficiary, a potential customer, or an individual an insurer is seeking to recover money from.</p>
Why	<p>This policy is intended to support the ongoing safety and wellbeing of Resolution Life customers, and to provide guidance and referral services to support customers impacted by domestic and family violence.</p> <p>This document should be read in conjunction with the Domestic and Family Violence – Customer and Employee Guideline.</p>

2. Policy

2.1 What is Domestic and Family Violence?

Domestic and family violence can take many forms, it can be physical abuse 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. It can also include emotional abuse, psychological abuse, sexual abuse, financial or economic abuse, threats of abuse, damage to property and animals in a family context as well as all these factors within a domestic context. Customers affected by family violence fall within a broader class of 'vulnerable customers'.

Domestic and family violence can occur in all types of relationships, for example: between married, de facto or intimate couples (including LGBTIQ+ relationships); between extended family members or adults and older parents; or an elder person and their carer either in their home or in a residential facility or between people living together in a domestic setting.

Domestic and family violence can affect anyone, regardless of age, gender, sexual orientation or identity, race, ethnicity, religion, cultural background, disability, socioeconomic status, or location.

Domestic and family violence can impact the health, safety, and wellbeing of Resolution Life's customers and/or callers.

2.2 How does this impact insurance?

Life insurance policies can be used by a perpetrator to control, frustrate or intimidate a victim. This can be for financial or emotional/mental control. The perpetrator can refuse to inform, cooperate, or sign

documents where the victim is a joint owner of the life insurance on a policy. Where the victim is policy holder, payments may be withheld without their consent or knowledge, leaving policies to lapse, leaving the victim uninsured. Where the victim is the life insured and the perpetrator is the policy holder the threat of financial gain due to violence can be used to control and intimidate. This is the most complex of situations as the life insured does not have legal rights to access or change the policy if they are not the policy owner.

2.3 How does this impact Superannuation and Investments?

Superannuation and investment plans can be used by a perpetrator to control, frustrate or intimidate a victim. This can be for financial or emotional/mental control. The perpetrator can refuse to inform, cooperate, or sign documents where the victim is a joint owner of the investment plan. Where the victim is the life insured and the perpetrator is the policy holder the threat of financial gain due to violence can be used to control and intimidate. The perpetrator can force or coerce the victim, who is the owner of the superannuation and/or investment plan/s, to withdrawal monies or change beneficiaries such that the perpetrator is the sole beneficiary, to garner control over the victim's finances. Where the victim is elderly and is the owner of the superannuation or investment plan/s, the perpetrator may force, coerce or mislead the victim to sign an enduring power of attorney resulting in the perpetrator to control all legal and financial decision making relating to the victims' plans.

2.4 Policy Principles

Resolution Life is committed to the safety and wellbeing of its customers. We will ensure the fair and sensitive treatment of customers affected by domestic and family violence and ensure that any decisions made consider the safety of the customer and their family.

Resolution Life will:

2.4.1. Provide staff with appropriate ongoing training who may need to deal with sensitive matters and will support staff who are dealing with customers affected by domestic and family violence so that staff:

- a. Are aware of domestic and family violence policy - and related guidelines and procedures - when they are engaging with someone experiencing domestic and family violence.
- b. Can identify customers affected by domestic and family violence.
- c. Can deal appropriately and sensitively with customers affected by family violence.
- d. Can apply the domestic and family violence policy - and related guidelines and procedures - relevant to their role in dealing with customers affected by domestic and family violence.

2.4.2. Early recognition of domestic or family violence

- a. Encourage customers experiencing domestic or family violence to notify Resolution Life of that fact via the channels such as Call Centre, Resolution Life website and relevant correspondence.
- e. Staff do not require evidence of an intervention order to trigger the requirements of the domestic and family violence policy. Customers self-identifying or demonstrating potential signs as outlined in the *Domestic and Family Violence Guidelines - Customer and Staff* as being affected by domestic or family violence will be treated in accordance with the policy without further evidence being required.

2.4.3. Protect private and confidential information

- a. Ensure protection of private and confidential information of customers affected by domestic and family violence.
- b. Treat these matters as confidential and will only disclose relevant information on a 'need to know' basis, with a customer's consent, or otherwise only if required to by law or for the express purpose of safety and/or security.
- c. Is committed to providing customers who may be experiencing domestic and family violence with clarity on their rights in relation to their insurance, superannuation and investments and support pathways if required. This includes explaining how they might create their own policy if they share ownership with the perpetrator.

2.4.4. Minimise the need for customers to repeat disclosure

- a. Where reasonable, minimise the information that a customer is required to provide and the number of times a customer is required to disclose the same information, noting that they may not have access to their personal information, records, and documents.
- b. Where possible, provide customers with consistency in speaking to one staff member, or a single pathway of escalation.
- c. Engage with the customer to discuss and agree safe ways to communicate and record these communication methods on the customer's file.

2.4.5. Sensitive claims handling

- a. Ensuring appropriate, flexible, and sensitive claims handling processes for claimants affected by domestic and family violence. This is particularly important if i. the customer and perpetrator are joint policy holders or ii. the perpetrator has contributed or caused the claim.
- b. Ensuring the need to explain to the customer the claims process clearly and transparently and what is required of them.
- c. Recognising that customers affected by domestic and family violence may come across as incoherent or scattered – and this does not indicate that their claim is invalid.
- d. Recognise that customers affected by domestic and family violence may not respond to communication or request for information as they may not have access to a phone, email, or their personal or financial records or other documents, and this does not necessarily indicate fraud or mean they have given up on the claim.
- e. Ensuring that customers affected by domestic and family violence are not required to do either of the following (unless they are comfortable doing so): i. make direct contact with the perpetrator or ii. make a police report about the perpetrator.
- f. Before paying the claim, try to ensure it is paying the appropriate party or parties.

2.4.6. Access to financial hardship help

- a. Will take additional care when dealing with customers affected by domestic and family violence and refer customers to financial hardship support in connection with the provision of insurance, superannuation, and investment services, where reasonable.
- b. Ask a customer who self-identifies or a customer who is demonstrating potential signs of being affected by domestic and family violence what their financial situation is, to determine whether they are also experiencing financial hardship and help arrange access to financial hardship support.
- c. Where possible, minimise the information and documents that customers are required to provide.

- d. When assessing a Financial Hardship application, not require an intervention order as evidence of domestic or family violence - instead, if the insurer identifies that the customer is affected by domestic and family violence (demonstrating potential signs as outlined in the *Domestic and Family Violence Guidelines - Customer and Staff*) or the customer discloses this information, that should trigger a referral to the appropriate team.
- e. If the customer is experiencing domestic or family violence, enable the Financial Hardship request to be fast tracked.
- f. If the customer is experiencing domestic or family violence, provide options for the customer to retain their policy if they say they cannot pay their premiums.

2.4.7. Collection arrangements

- a. Ensuring collection arrangements are handled sensitively and consider the risks involved in attempting to recover debts in situations involving family violence - whether from a customer experiencing family violence or from the perpetrator.

2.4.7. Making customers affected by domestic and family violence aware of information and help available and refer customers to domestic and family violence specialist services.

- a. Provide information to customer that they can contact an external legal or support organisation specialising in domestic and family violence and financial hardship services, as appropriate. Staff can refer to the *Domestic and Family Violence Guidelines – Customer and Staff* referral list of recognised external domestic and family violence and financial hardship services and provide information to customers on how they may access such assistance.
- b. Engage with the customer to determine if communication should involve the customer's financial counsellor, lawyer, community services or social work, legal aid officer or family violence specialist.
- b. If a customer is dissatisfied with Resolution Life's management of their vulnerability, they can lodge a complaint. Resolution Life will provide information about the complaint management process.

2.4.8. Support for Staff affected by domestic and family violence or affected by supporting vulnerable customers

- a. Provide support to Resolution Life staff affected by family violence or who are affected by dealing with vulnerable customers through an employee assistance line, line management or human resources discussions, training, and the provision of resource documents.

2.5 Definitions

Domestic and Family Violence

Domestic and family violence is a pattern of abusive behaviour in an intimate relationship or other type of family or domestic relationship where one person assumes a position of power and control over the other and causes confusion and fear. Domestic and family violence is a form of manipulation and coercive control. It can take many forms, including:

- Physical assault, including threats of physical harm
- Sexual Abuse/acts of sexual violence, including forced sex/sexual acts, reproductive abuse
- Emotional abuse, including disrespect, name calling and put downs
- Isolation geographical and emotional, from family, friends, or support networks
- Stalking or monitoring of movements
- Psychological abuse, such as blaming the person experiencing the violence, manipulating, or twisting reality (gaslighting, minimising/denying the abuse)

	<ul style="list-style-type: none"> • Financial abuse, such as withholding access to money, preventing someone from working, manipulating the child support system, and intimidating someone to sign documents that put them in debt • Preventing someone from practicing their spirituality or faith or forcing them to adopt a spirituality or faith that is not their own. Using someone's spiritual beliefs to control or dominate them. • Harming or threatening to harm loved ones including children, family member, friends, and pets. • Legal abuse, such as using the family law system to continue the abuse and intimidate, exhaust, exploit or disempower someone. • Technically facilitated abuse includes online hacking, image-based abuse, cyber stalking/harassment, and online impersonation.
Domestic and Family Violence in Insurance	<p>Where an insurance policy may be used by the perpetrator to control or frustrate the victim of domestic and family violence. This can be for financial or emotional/mental control as highlighted in Domestic and Family Violence definition. The following are all examples of Domestic and Family Violence in relation to Insurance:</p> <ul style="list-style-type: none"> • Perpetrator can refuse to inform, cooperate or sign documents where the victim is a joint owner of the life insurance on a policy. • Where the victim is a policy holder, payments may be withheld without their consent or knowledge, leaving policies to lapse and the victim uninsured and unaware. • Where the perpetrator is the policy holder and beneficiary and the victim is the life insured, the policy can be used a threat to personal safety including threats to the victim's life. The victim is unable to transact on the policy of which the perpetrator may also be aware.
Domestic and Family Violence in Superannuation and Investments	<p>Where a superannuation account, investment plan or conventional insurance policy may be used by the perpetrator to control or frustrate the victim of domestic and family violence. This can be for financial or emotional/mental control as highlighted in Domestic and Family Violence definition. The following are all examples of Domestic and Family Violence in relation to Superannuation and Investments:</p> <ul style="list-style-type: none"> • Perpetrator can refuse to inform, cooperate, or sign documents where the victim is a joint owner of the investment plan or life insurance. • They may be unduly forced to sign a power of attorney so that the perpetrator can control and benefit from managing all legal and financial decisions relating to the victim's superannuation and/or investment plan/s. • The perpetrator can force or coerce the victim, who is the owner of the superannuation or investment plan/s, to withdrawal monies or change beneficiaries such that the perpetrator is the sole beneficiary, to garner control over the victim's finances.

2.6 Understanding Customer Risks

Intimidation and Threats to the victim's life	A customer may be experiencing intimidation and threats harm where a perpetrator stands to benefit financially as they are the beneficiary of a policy on the victim's life.
Concern disclosure may impact eligibility	A customer may be worried that by disclosing they are a victim of domestic and family violence it could impact their insurance if they are considered an increased insurance risk.

Concern policy is not active (lapsed)	A customer may be concerned that a policy may lapse to due to missed payments where they are experiencing financial abuse and unable to keep payments current themselves. They may need financial hardship support.
Stress and fear if unable to cancel a policy	Where policies are jointly owned the victim cannot cancel without consent of the perpetrator, this may lead to stress and fear if the victim is the life insured and the perpetrator is the beneficiary.
Fear talking to Resolution Life about policy may put victim in danger	There is a risk that the address of the victim, if they have left the relationship and have a joint policy, being revealed to the perpetrator could put them in danger.
Stress and fear in changing beneficiaries	A customer may be concerned to make the request to change their beneficiary for their superannuation and/or investment plan/s, and any delays in this request being processed, as the perpetrator will be the beneficiary and stands to benefit financially.
Stress and fear in making withdrawals	A customer may be concerned to make the request for a partial or full withdrawal (or roll-over) from their superannuation and /or investment plan/s, and any delays in this request being processed and monies being received, as the perpetrator stands to benefit financially.
Stress and fear in authorising a third party on the policy or plan	A customer may be concerned to authorise a third-party access to their policy or plan, and any delays in this request being processed, as the perpetrator will be able to access and make changes to policy / plan information and beneficiaries.

3. More Information

3.1 Responsibilities

The roles and responsibilities about this Policy are set out below:

Employees	<ul style="list-style-type: none">• Understand and follow this policy. Specific responsibilities being:<ul style="list-style-type: none">○ Understand what information customers may access depending on their individual policy set-up as per BAU process and the guidelines associated and information that can be disclosed.○ Be able to provide details to support services if a customer (or an adviser on the customer's behalf) discloses that they are impacted by domestic and family violence.○ Inform your leader if a customer (or adviser on customer's behalf) discloses they are impacted by domestic and family violence.
Leaders	<ul style="list-style-type: none">• Provide support to employees who are dealing with a domestic and family violence situation with a customer by:<ul style="list-style-type: none">○ providing the appropriate training and coaching to adhere to this policy○ providing an escalation point as per business as usual (BAU)○ providing emotional support to the employee○ providing details on where they can access further support such as Employee Assistance Program (EAP)○ helping with rules around accessing information
Chapter Area Lead - Customer Experience	<ul style="list-style-type: none">• As Policy Owner:<ul style="list-style-type: none">○ communicate this Policy to wider business and ensure relevant Chapter Areas are updated so they can update their teams and processes.○ Ensure this policy remains current, complies with all regulatory requirements, and reflects changes as they occur.○ Review this Policy every two years or upon significant legislative or industry change.○ Monitor adherence to this Policy and ensure appropriate controls are in place.

3.2 Compliance and consequence management

All employees are required to comply with this policy document. Any non-compliance may result in disciplinary action up to and including termination of employment in accordance with our Management of Conduct Policy.

Any instance of non-compliance should be treated in accordance with the Incident, Issues and Breach Management Policy and an incident logged in the relevant incident management system.

3.3 Resources and related policy documents

For further information please refer to CKB Policy section and the following resource

- Domestic and Family Violence Guideline - Customer and Staff

3.3.1 Document controls

Approved by	Chief Customer & Operating Officer - Paul Tarlinton
Policy owner	Chapter Area Lead - Customer Experience
Last approved	September 2022
Next Review	September 2024
Distribution	CKB Policy Centre

This Policy will be reviewed every 2 years.