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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 All Parks Insurance (All Parks) 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 All Parks 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 All Parks Compliance Management System which represents the entire suite of policies and procedures that fulfil All Parks' legal and regulatory requirements as an Australian organisation providing intermediary General Insurance services.

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

1. age;
2. disability;
3. mental health conditions;
4. physical health conditions;
5. family violence;
6. language barriers;
7. cultural background;
8. Aboriginal or Torres Strait Islander status;
9. remote location; or
10. financial distress.

2. POLICY STATEMENT

All Parks has a long-standing commitment to conducting its business with honesty and integrity and remains committed to full compliance with the Code and informing Customers, employees and service suppliers about information and assistance available to vulnerable people, including those experiencing Financial Hardship and Family Violence.

This policy and the All Parks internal policy 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.

All Parks may need to be flexible and vary the approach based on individual circumstances, including providing more personalised

support to help navigate our processes and working within any processes and procedures set by our security partners.

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 the Policy is to ensure that whenever Family Violence is identified or suspected, the safety of the Customer affected by Family Violence and their family is protected.

All Parks 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 the highest priority. Customers who indicate or disclose Family Violence are able to access support from All Parks Insurance appropriate to their circumstances.

4. ASSISTING CUSTOMERS

All Parks can assist vulnerable Customers, including those experiencing Financial Hardship or Family Violence by:

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

These assistance measures may be expanded and varied depending on what our security partners have established.

In circumstances where the issue is complex or unable to be dealt with by the primary person who took the call, it is to be immediately referred to the Compliance Team for consideration.

The Customer must be informed of this action.

5. INTERPRETERS

If a Customer informs All Parks of their need for an interpreter, or we identify such a need, we will direct the Customer to the relevant section of the insurer's website.

6. IDENTIFICATION

If a Customer requires support to meet identification requirements, All Parks will take reasonable measures to provide such support. The approach of All Parks to satisfying customer identification requirements will be in accordance with section 7 of the Access and Correction of Personal Information Policy.

7. FINANCIAL HARDSHIP

Financial Hardship occurs when Customers experience difficulty in meeting their financial obligations to All Parks or our security partners.

The support All Parks can offer does not include support with paying the premiums under an insurance policy we have issued.

If a Customer informs All Parks, 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 – 1800 007 007.

7.1 Assessing Requests for Financial Hardship Support

When assessing requests for Financial Hardship support, All Parks 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 All Parks requires additional information after receiving the application, we 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 All Parks is taking action to recover an amount from a Customer, the action will be put on hold if we identify 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, All Parks 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 we have assessed the Financial Hardship application and notified the Customer of the decision.

7.3 Making our Decision

All Parks 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 we have requested additional information.

7.4 Customers Entitled to Financial Hardship Support

If All Parks 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;

7.5 Customers Not Entitled to Financial Hardship Support

If All Parks determines a Customer is not entitled to Financial Hardship support, we will inform them of the reasons for the decision and about our Complaints process.

8. PROTECTING PERSONAL INFORMATION

At all times and in accordance with Privacy laws and All Parks 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.

The Code requires All Parks to protect 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.

9. TRAINING

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

All Parks will aim to ensure that all employees and third-party providers have been trained and receive ongoing training so that they:

- are aware of All Parks 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

All Parks will ensure that service suppliers who deal directly with Customers, such as loss assessors, investigators and claims management services are trained to the same level as our employees.

10. REPORTING

Any notification of Vulnerability or Financial Hardship received by a member of staff must be reported via the ERM Online form: GI Code of Practice – Referrals.

11. SUPPORT SERVICES AND RESOURCES

Agency	Phone	Website
1800 RESPECT	1800 737 732	1800respect.org.au
Beyond Blue	1300 224 636	beyondblue.org.au
Lifeline	13 11 14	lifeline.org.au
MENSLINE	1300 789 978	mensline.org.au
National Association of Community Legal Centres		naclc.org.au/
National Debt Hotline	1800 007 007	https://ndh.org.au/

12. SECURITY PARTNERS

A number of our security partners have developed their own Family Violence Policies and other policies supporting vulnerable customers. However, the general concepts are all generated from parts 9 and 10 of the Code.

A security partner may set out the processes and procedures pursuant to which they expect an agency to deal with vulnerable customers. We would expect this to align with parts 9 and of the Code and, in general, this policy.

13. REVIEW DATE

This Policy is due for review once per year or as required by updates to the Code by the ICA.