

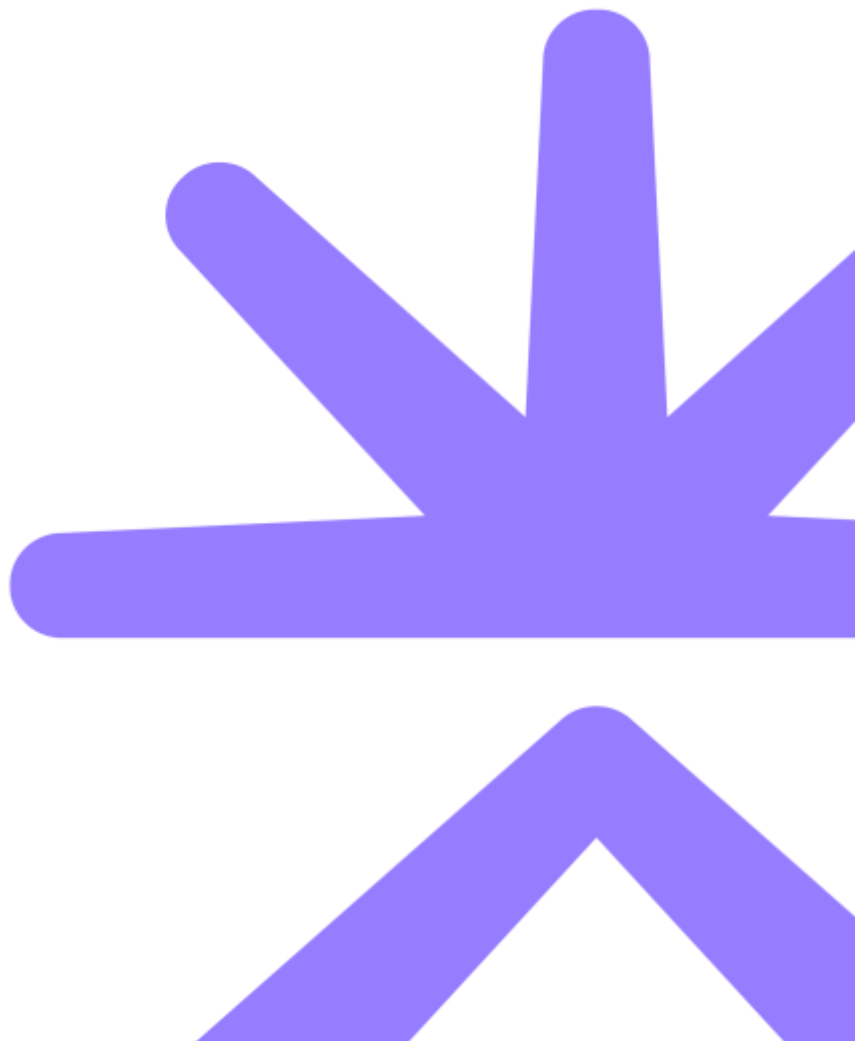
# Family Violence Awareness Policy

Operational Policy

Version: 2.0

Approval date: 20/07/2021

Effective date: 20/07/2021



# Table of Contents

1. Policy Overview.....	3
1.1 Policy statement .....	3
1.2 Purpose.....	3
1.3 Scope.....	3
2. Legal and Compliance Requirements .....	4
2.1 Legal requirements.....	4
2.2 Penalties and consequences.....	4
2.3 Review and update of the policy statement .....	4
3. Operating Principles and Guidelines .....	5
3.1 How to identify individuals potentially impacted by family violence .....	5
3.2 Training and Awareness .....	5
3.3 What we expect from our employees.....	5
3.4 Protecting private and confidential information .....	5
3.5 Minimising the need for individuals to repeat disclosure .....	5
3.6 Sensitive claims handling, hardship and debt collection arrangements.....	5
3.7 Informing consumers.....	6
3.8 Referrals to support services .....	6
3.9 Suppliers.....	6
4. Roles and Responsibilities .....	7
4.1 Operations.....	7
4.2 All employees.....	7
Appendix A: Family Violence Support Services .....	8

## Company information table

### Confidentiality and Copyright

© Copyright 2022 Helia Group Limited (Helia). All rights reserved. This document is confidential. No part of this document may be reproduced in any form or by any means, or provided to any third party, without the express written permission of Helia. Helia, Helia Financial and the Helia logo are registered service marks of Helia Financial, Inc.

### References within this document

Within this document, a reference to Helia or 'the Company' refers to Helia Group Limited and its subsidiary companies.

References to the Board are to the Boards of Directors of Helia and its subsidiary companies unless a specific Board is specified. All References to amounts are in Australian Dollars (AUD).

# 1. Policy Overview

## 1.1 Policy statement

This Family Violence Awareness Policy (“**Policy**”) outlines the mechanisms by which Helia aims to identify and support consumers affected by family violence. For the purposes of this Policy the term “**family violence**” applies the definition of that term “**family violence**” in section 4AB of the **Family Law Act 1975** ‘being “**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.**”

## 1.2 Purpose

This Policy outlines how Helia’s **processes are structured to support people (other than our employees) affected** by family violence. The Policy is made publicly available to ensure individuals who interact with Helia are able to understand what mechanisms are in place to provide this support. Our employees are trained on this Policy to ensure timely, consistent and targeted assistance can be provided to individuals affected by family violence. This Policy also supports Helia’s **corporate behaviours of continuously improve the customer’s experience.**

## 1.3 Scope

This Policy covers all day-to-day interactions between Helia and the individuals with whom we contact or who contact us and must be adhered to by all employees.

The Helia Family and Domestic Violence Support Policy outlines how Helia’s **processes are structured to support** Helia employees affected by family or domestic violence.

## 2. Legal and Compliance Requirements

### 2.1 Legal requirements

This Policy has been drafted with reference to Helia's **commitment to the General Insurance Code of Practice** and the associated guide to helping customers affected by family violence.

### 2.2 Penalties and consequences

Non-compliance with this Policy may expose the individuals with whom we interact to an elevated risk of harm and may expose the Company to potential civil liability, liability under contracts with **the Company's customers and** other counterparties, regulatory sanctions including fines and undertakings, and potentially criminal liability.

### 2.3 Review and update of the policy statement

This Policy should be reviewed every three years (or as determined) by the Director of Operations.

## 3. Operating Principles and Guidelines

### 3.1 How to identify individuals potentially impacted by family violence

Individuals affected by family violence may be reluctant or unable to disclose their circumstances. Helia employees in consumer facing roles are trained to look for indications of family violence.

### 3.2 Training and Awareness

All Helia employees receive training to ensure they are aware of this Policy and understand how it is relevant to their role at Helia including (as relevant) how to identify consumers potentially impacted by family violence as well as how to interact appropriately and sensitively.

This training and awareness is provided as part of new employee induction and delivered both online and face to face, **as appropriate with the individual's role.**

### 3.3 What we expect from our employees

All employees in consumer facing roles are expected to be:

- Aware of the prevalence and effects of family violence;
- Understand how the potential impact (positive and negative) of our actions may impact consumers experiencing family violence;
- Understand the need for strict privacy and confidentiality in relation to individuals affected by family violence.

Where an employee is in a consumer facing role, they are expected to:

- Have careful and sensitive conversations with a consumer affected, or potentially affected, by family violence without disclosing to the perpetrator of such violence that the employee is aware of the family violence, or potential for violence;
- Appropriately triage matters involving potential family violence to identify matters of higher priority or for escalation;
- Refer a consumer potentially impacted by family violence to specialist services that can give further guidance;
- Know about local referral pathways and contacts for local support services; and
- Understand that a consumer affected by family violence may prefer to speak to an employee of the same sex.

### 3.4 Protecting private and confidential information

At Helia, we never provide personal information to a third party without their express consent including for joint accounts. We also place strict controls over the collection, storage, access and use of information pertaining to family violence or potential family violence.

We encourage employees to liaise with the Director of Operations for all consumer-related matters.

### 3.5 Minimising the need for individuals to repeat disclosure

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

- Doing so can have a traumatising effect through individuals reliving their experiences; and
- Individuals may not always be in a position to talk about their circumstances. For example, the perpetrator may be present, monitoring their call or monitoring their web or mobile phone usage.

### 3.6 Sensitive claims handling, hardship and debt collection arrangements

We support sensitive and timely claims handling and hardship arrangements through our close working relationship with our lender customers.

We promote the ICA *‘Guide to helping customers affected by family violence’* in our working relationship with our lender customers.

Where we are aware that a **consumer’s** debt involves a situation of family violence we will not refer or sell that debt to a third-party debt collection agency. We perform due diligence on these agencies to ensure that they have appropriate practices for interacting with consumers.

Helia’s **collection activities and those of the third-party** debt collection agencies we may sell consumer debt to comply with the *“Debt collection guideline: for collectors and **creditors**”* published by the Australian Competition and Consumer Commission and the Australian Securities and Investments Commission.

### 3.7 Informing consumers

Helia makes this Policy available on its public website as well as free of charge upon request.

### 3.8 Referrals to support services

Our employees will not generally be appropriately equipped to help with family violence outside the scope of insurance matters for consumers or employment matters for employees.

The list of referral bodies Helia employees may utilise is outlined by geographic region in Appendix B.

### 3.9 Suppliers

Helia’s **Supplier Code of Conduct** outlines the standards which we expect all our suppliers to meet. This code of conduct is available on the Helia website and includes reference to this Policy.

## 4. Roles and Responsibilities

This section identifies the individual roles (by title) and responsibilities associated with the management/implementation of this policy.

### 4.1 Operations

- Ensure prompt and thorough investigation and follow-up of complaints or issues lodged by consumers under this Policy.

### 4.2 All employees

- Timely completion of training as it relates to this Policy.
- Professional and compassionate dealings with consumers and suppliers (as appropriate to the **employee's role**).

## Appendix A. Family Violence Support Services

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