



5 August 2024

Standing Committee on Economics
PO Box 6021
Parliament House
Canberra ACT 2600
by email: floodinsurance.reps@aph.gov.au

Supplementary Submission to the inquiry into insurers' responses to 2022 major floods

This is a further supplementary submission to our previous two submissions provided to the committee's inquiry into the insurers' responses to 2022 major floods.

In our first supplementary submission we recommended that the committee seek specific improvements to the self-regulated General Insurance Code of Practice to address the issues impacting consumers, particularly vulnerable consumers.

One key element to the Code of Practice is the requirement to have a publicly available family violence policy: Clause 95. To support their subscribers, the Insurance Council of Australia developed a voluntary, non-enforceable *Guide to helping customers affected by family violence* which sets out how insurers can identify and support people affected by family violence. This guide identifies 11 areas that should be addressed by subscribers in a family violence policy.

Providing frontline support to those people experiencing forms of vulnerability including family violence – especially after a flood or other natural disaster – is critically important to ensure that insurers do not exacerbate what is already a traumatic time.

In 2021 Financial Rights conducted research examining whether general insurance code subscribers met not just the letter of the commitment to have a family violence policy but the spirit of the commitment – i.e. the quality of the policies developed and what protections and commitments were being made to customers who may be subject to family violence.¹ The aim of the audit was to examine whether subscribers' family violence policies addressed

¹ Financial Rights, [Family Violence and General Insurance: Desktop audit of family violence policies](#), August 2021

the 11 areas listed in the ICA's Guide to helping customers affected by family violence to be included in a family violence policy.

That 2021 research found that a little over half the subscribers had policies that addressed only half of the requirements under the 11 areas listed in the ICA's Guide to helping customers affected by family violence to be included in a family violence policy.

Financial Rights has subsequently updated this research this month.

Central to this updated inquiry was the question: has our benchmarking, and the voluntary and aspirational nature of the Insurance Council of Australia's Family Violence Guide helped insurers to achieve best practice policies, or at the very least led to insurers improving their family violence policies?

The results of this update are in the attached document: *Family Violence and General Insurance: Updated Desktop audit of family violence policies, August 2024*.

This report shows that the results are mixed, at best.

There have been some welcome improvements. 11 insurers (23%) took steps in the last three years to improve their family violence policies. A handful of these have been significant improvements.

There has also been an increase in use of quick exit buttons that make the experiencing of seeking help safer. And IAG and Allianz (in addition to Suncorp) have added a 'conduct of others' clause to their product offerings. These changes are positive and have the potential to make a real difference to lives of victim survivors.

Despite these positive moves, there has been a disappointing overall lack of movement from general insurers.

Close to two thirds of code subscribers chose not to improve their family violence policies, despite the previous audit having identified that many were failing to meet the standards expected of them.

For those who did improve, no additional insurer introduced a family violence policy that fully addressed all the expectations of the Insurance Council of Australia Guide.

We are particularly disappointed by the insurer who reviewed their policy and slipped backwards.

This means that a consumer experiencing family violence may find themselves seeking help from an insurer who has a minimal policy, or no family violence policy at all.

If we are to wait for general insurers to all voluntarily achieve best practice, then we may have to wait a very long time. And while we wait, some of the most vulnerable consumers in Australia pay the price.

The key recommendation of the 2021 desktop audit was that key elements of the Family Violence Guide should be included in the General Insurance Code in such a way that empowers the Code Governance Committee to assess subscribers meeting the content expectations of a family violence policy and compliance with their commitments made under those policies.

This recommendation stands and is or the more urgent since the aspirational and voluntary nature of the Guide has clearly not led to the systemic improvements required.

Kind Regards,

Karen Cox
Chief Executive Officer
Financial Rights Legal Centre

Family Violence and General Insurance

Updated Desktop audit of family violence policies

August 2024



Introduction

Family violence and financial abuse is an unfortunate reality faced by too many Australians. While attention is usually focussed on the impact of family violence on controlling people's access to money and incurring debt, it also arises in a general insurance context.

Perpetrators can undermine their victim's ability to access the benefits of insurance either unintentionally – as a by-product of their conduct - or intentionally – by using insurance as a tool to inflict abuse. Perpetrators can, for example, take control of home or car insurances and deprive their partner of insurance altogether, or preventing them from making a claim or receiving a payment. Perpetrators can also damage homes leaving innocent victims unable to claim due to exclusions under the policy. Survivors of family violence can also be treated poorly by insurance claims handling processes and other service offerings, where survivors can, for example, be forced to repeat their stories, retraumatising them in the process.

Awareness of family violence and its links to financial abuse is becoming more widely understood. The Australian Parliament established a joint committee inquiry into Financial Services Regulatory Framework in Relation to Financial Abuse earlier this year. The issue has also been raised in the current independent review of the 2020 General Insurance Code of Practice, as well as in the context of general insurers treatment of consumers – particularly those experiencing vulnerability – in the aftermath of a series of floods and other natural disasters.

It is in this environment that Financial Rights has undertaken to update our desktop audit of the general insurers family violence policies – key documents required under the General Insurance Code of Practice. Our 2021 research sought to understand how the sector was supporting those experiencing family violence and to identify which insurers' written policies demonstrated best practice. This update was undertaken to find out whether insurer subscribers had acted to improve their written policies since the original benchmarking audit.

Central to this inquiry is a key question: has our benchmarking, and the voluntary (and aspirational) Insurance Council of Australia's Family Violence Guide developed to assist insurers to achieve best practice policies, actually led to insurers improving their family violence policies?

This report shows that the results are mixed, at best.

There have been some welcome improvements. We are pleased to see that 11 insurers took steps in the last three years to improve their family violence policies. A handful of these have been significant improvements.

We also welcome the increase in use of quick exit buttons that make the experiencing of seeking help safer. And we commend IAG and Allianz (in addition to Suncorp) for adding a 'conduct of others' clause to their product offerings. These changes are positive and have the potential to make a real difference to lives of victim survivors.

Despite these positive moves, we have been disappointed by an overall lack of movement from general insurers.

Close to two thirds of code subscribers chose not to improve their family violence policies, despite the previous audit having identified that many were failing to meet the standards expected of them.

For those who did improve, no additional insurer introduced a family violence policy that fully addressed *all* the expectations of the Insurance Council of Australia Guide.

We are particularly disappointed by RACT who reviewed their policy and slipped backwards.

This means that a consumer experiencing family violence may find themselves seeking help from an insurer who has a minimal policy, or no family violence policy at all.

In 2024, this is no longer acceptable.

Despite the important improvements identified in this audit - the report's overall findings should be a wake-up call to a sector that is falling behind community expectations at a time when urgent action is needed.

The sector needs to step up and commit to embedding key elements of the Family Violence Guide into the General Insurance Code as enforceable commitments to consumers. We want to see them introduce best practice family violence policies and commit to review and improve their product and service design.

If we are to wait for general insurers to all voluntarily achieve best practice, then we may have to wait a very long time. And while we wait, some of the most vulnerable consumers in Australia pay the price.

Karen Cox, Chief Executive Officer, July 2024

Executive summary

Financial Rights has undertaken a desktop audit of 55 general insurers family violence policies. These policies are required under the General Insurance Code of Practice, but the content and form is recommended (rather than strictly required) by the Insurance Council of Australia's voluntary [Guide to helping customers affected by family violence](#).

Financial Rights sought to inquire into which insurers' written policies demonstrate best (or better) practice, building upon a [2021 desktop audit](#) that benchmarked all 47 General Insurance Code subscribers' family violence policies. The purpose was to identify whether subscribers had acted to improve their written policies in the intervening three years since the previous benchmarking audit.

This exercise was a point-in-time desktop audit of insurers' written policies, as of 8 July 2024.

This audit was not an assessment of a subscriber's compliance with, and implementation of, their own family violence policy. Nor was it an evaluation of a subscriber's culture of supporting customers experiencing family violence, or a judgement on an insurer's internal policies that may or may not address the expectations of the Guide to helping customers affected by family violence.

It's important to note that insurers do not have the same range of product offerings. Having a good policy on paper is perhaps easier when you are less likely to be called on to act on it because you only offer a narrow range of products.

Key findings

The 2024 desktop audit found that:

- Only 11 of the original 47 family violence policies (23%) were updated and improved.
- But those policies that did improve did so significantly, notably Nib and RACQ.
- 29 of the original 47 family violence policies (62%) remain unchanged, including 3 policies that were reviewed but unchanged. One further policy arguably did not need to be updated since they had already met all expectations outlined by the Guide.
- 1 of the original 47 subscriber insurers (RACT) was updated and moved backwards.
- 2 of the original 47 subscribers (Catholic and Eric) have closed or are in run off and no longer have policies available, even though they continue to serve existing customers who may need to call upon a family violence policy. A further insurer, Commonwealth Insurance, sold to Hollard in 2022 and is no longer a subscriber to the Code.
- 5 of 8 new subscribers' have introduced family violence policies.

- However, 3 newly identified subscribers' family violence policies were unable to be located.
- Only one insurer continued to receive a perfect score – AssetInsure.
- There are now fewer original subscribers with family violence policies that only address half or less of the expected factors – an improvement on the 2021 results.
- There does remain significant numbers of insurers whose family violence policy does not meet all the expectations outlined in the Guide.
- 3 of Australia's biggest insurers: Suncorp, Allianz and IAG that have now included a 'conduct of others' clauses in their product disclosure statements.
- 10 additional insurers have added quick exit buttons to enable a safer browsing experience for consumers experiencing family violence.

Recommendations

- Key elements of the Guide should be incorporated into the General Insurance Code itself, to be monitored by the General Insurance Code Governance Committee.
- All insurers should adhere to the form and content outlined by the Guide.
- All new Code subscribers must meet the 2020 Code commitments on family violence.
- All insurers should introduce identified best practices to their policies and their products and service design.
- All insurers in run-off should maintain subscription to the General Insurance Code of Practice and maintain a Family Violence Policy.

Snapshot

Of the original 47 general insurance family violence policies

23% were updated and improved

But those policies that did improve did so significantly, notably **Nib** and **RACQ**



62% remain unchanged including

» **3 policies** that were reviewed but were **unchanged**

1 policy already **met all the expectations** outlined by the Guide

1 was updated but **moved backwards** - **RACT**

2 are in run off and **no longer have policies available** even though they continue to serve existing customers - **Catholic** and **Eric**

Of the 8 new subscribers

5 have introduced family violence policies

3 had family violence policies that were unable to be located

Only **1** insurer continued to receive a **perfect score** – **AssetInsure**



There are fewer original subscribers with family violence policies that only address half or fewer of the expected factors, **an improvement on 2021**

There does remain significant numbers of insurers whose family violence policy does not meet the expectation of the Guide

3 of Australia's biggest insurers Suncorp, Allianz and IAG now include 'conduct of others' clauses in their product disclosure statements

10 insurers have introduced **quick exit buttons** to enable a safer browsing experience for consumers experiencing family violence

2024 Desktop audit of family violence policies

The [2020 General Insurance Code of Practice](#) (**the General Insurance Code**) introduced a requirement for insurers to have family violence policies available online for their customers. For many insurers, this will be the first publicly available written policy indicating how they will support customers experiencing family violence.

In 2021 the Financial Rights Legal Centre (**Financial Rights**) saw this as an important opportunity to inquire into which insurers' written policies demonstrated best practice, and to benchmark all General Insurance Code subscribers to encourage continual improvements to their family violence policies.

This resulted in the report [Family Violence and General Insurance: Updated Desktop audit of family violence policies, August 2021](#). Only one general insurer's family violence policy, AssetInsure, achieved top marks for a policy that included both definitive language and specific measures, and detailed how they would help those subject to family violence. Disappointingly, a little over half the subscribers scored 5.5 out of 11 or less, meaning that their policies did not even meet half the expectations outlined by the Insurance Council of Australia.

In November 2023, the Insurance Council of Australia announced an [independent review of the 2020 General Insurance Code of Practice](#). Financial Rights once again saw this as an opportunity to investigate whether insurer subscribers had acted to improve their written policies in the intervening two years since the previous benchmarking report was released. We wanted to see whether the aspirational nature of the Family Violence Guide had resulted in tangible improvements to insurers' family violence policies.

A full methodology is detailed at **Appendix A**

Audit Findings

This report includes a desktop audit of 55 current general insurers family violence policies as of 8 July 2024. These 55 General Insurance Code subscribers included 47 insurers who were benchmarked in 2021, and 8 newly identified code subscribers. The full results of this audit are at **Appendix B**.

Original benchmarked subscribers

There were 47 family violence policies reviewed as part of the 2021 audit. Of the insurers that formed part of the 2021 audit, the key findings of the 2024 audit are:

29 out of 47 family violence policies remain unchanged

In other words, 62% of the original set of subscribers failed to update or improve their family violence policies. Of the 29 policies that are unchanged, 3 were unchanged despite being reviewed (Cover-more, Domestic and General and Lloyds).

We also note that 1 insurer's policy (AssetInsure) remained unchanged but arguably did not require any changes, since they had achieved full marks previously.

29 insurers' family violence policies remain unchanged

AAI, AI, AIG, Aioi, Ansvar, Auto & General, Berkshire Hathaway, Chubb, Cover-more, Creditcorp, Defence, Great Lakes, Guild, LFI, Mitsui Sumitomo, Open Insurance, PD, Petsure, RAA, Swiss Re, Hollard, Tokio Marine, Virginia Surety, Westpac, Zurich, Arch, Domestic and General, Munich Re, Lloyds

14 out of 47 family violence policies were updated - but only 11 improved

14 out of 47 family violence policies have been updated since 2021 (32%), however not all were improved:

- Only 11 of the 14 family violence policies (23% of the total original 47 subscribers) were updated and *improved*. Those that improved their policies were a mix of small and large insurers.
- 2 family violence policies (4%) were updated but stayed the same score as that reported in the 2021 audit (Helia and NTI), and
- 1 family violence policy (2%) have been updated and gone backwards: RACT.

11 insurers' family violence policies were updated and improved

Allianz, Hallmark, Insurance Australia, Insurance Manufacturers, Nib, QBE, QBE Lenders Mortgage, RAC, RACQ, Southern Cross, Youi

2 out of 47 insurers have either closed or no longer have policies available

Two insurers were found to have made the commercial decision to enter run-off and will no longer write new business or renew policies:

- Catholic Church Insurance Limited: Although in run-off, a statement regarding family violence is made on the landing page of the website; however, the policy cannot be accessed.

- Eric's website provides notice to customers that as of 1 September 2024, they will no longer subscribe to the Code as it is exiting the general insurance market.

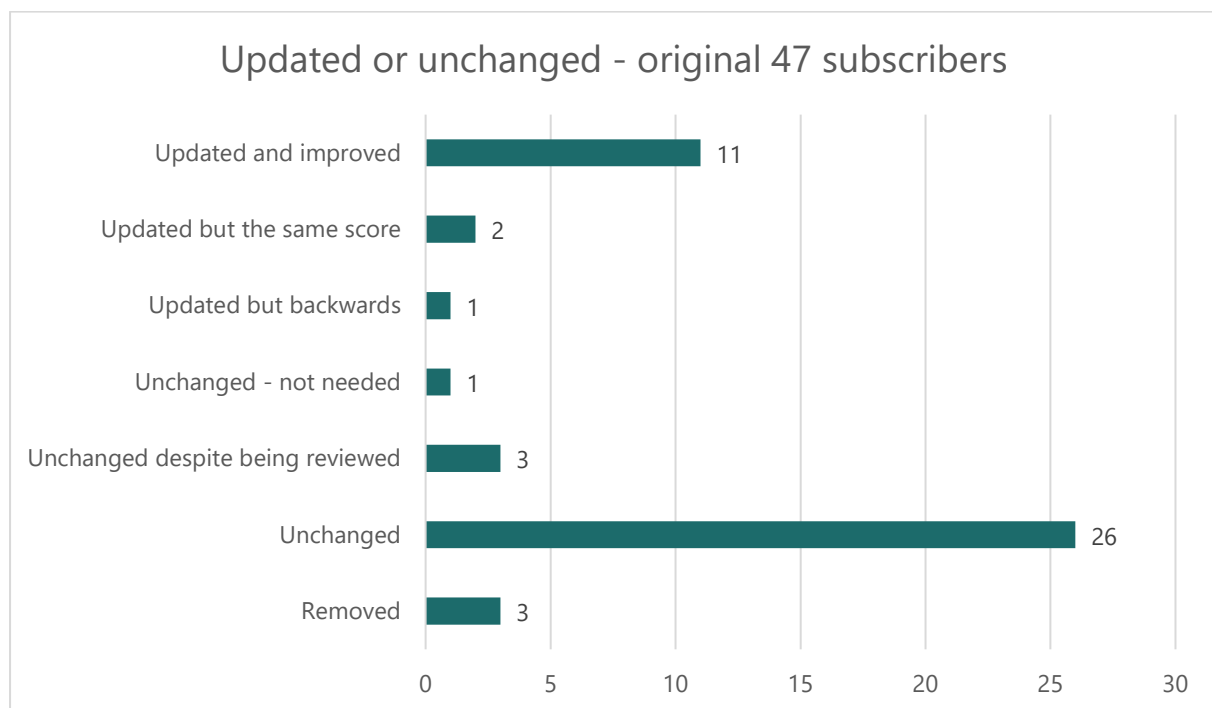
Both insurers still provide insurance to existing customers.

Genworth Mortgage Insurance Australia formally changed its name to Helia Group in November 2022.

Commonwealth was sold to Hollard in 2022 and is no longer a subscriber to the Code.

2 insurers have either closed or no longer have policies available

Catholic and Eric



Benchmarking new subscribers

The 2024 audit identified an additional 8 new insurer subscribers to the Code since 2021. These insurers were reviewed, and we found the following:

3 out of 8 newly identified subscribers' family violence policies could not be located

The audit was unable to locate family violence policies for three newly identified Code subscribers: Lawcover, Factory Mutual, HDI Global.

The audit found no reference at all to family violence on Lawcover and Factory Mutual's websites. On HDI Global's website, an 'Australia: Support for Vulnerable Customers' page noted that readers could access the Family Violence & Supporting Vulnerable Customers Policy. On accessing the 'Support for vulnerable customers' page there was a link to the family violence policy, which took the reader back to the page 'Australia: Support for Vulnerable Customers'. If the is made available on the website somewhere, we could not locate it.

3 newly identified subscribers' family violence policies were unable to be located

Lawcover, Factory Mutual, HDI Global

5 out of 8 newly identified subscribers' have introduced family violence policies

Newly identified subscribers ANZ Lenders Mortgage, Pacific International, Sompo, Sunderland Marine and XL all had family violence policies available on their website.

3 of these scored 5 or less out of 11, while 2 scored more than 5 out of 11. The North of England Protecting and Indemnity Association Limited t/as Sunderland Marine scored the highest of the newly identified subscribers, at 9.5/11.

5 newly identified subscribers' have introduced family violence policies

ANZ Lenders Mortgage, Pacific International, Sompo, Sunderland Marine and XL

Scoring

Only one insurer achieved a perfect score

AssetInsure continues to have the strongest family violence policy in the general insurance industry. As in 2021, only AssetInsure achieved an 11 out of 11 score.

This was followed by two insurers with an almost perfect score of 10.5 (Nib and Youi) – both improvements on 2021 scores. Two insurers achieved a score of 10 points, Tokio Marine and Allianz, the latter improving from 2021.

Table 1: Top 10 ranked original subscribers, 2024

Rank	Insurer	2024 Score	2021 Score	Difference
1	AssetInsure	11	11	~
=2	Nib	10.5	5.5	+5
=2	Youi	10.5	9.5	+1
=4	RACQ	10	5	+5
=4	Tokio Marine	10	10	~
6	Allianz	9.5	6.5	+3
=7	Aioi	9	9	~
=7	Great Lakes	9	9	~
=7	Munich Re	9	9	~
=10	AAI	8.5	8.5	~
=10	AIG	8.5	8.5	~
=10	Chubb	8.5	8.5	~
=10	RAC	8.5	4.5	+4

There are now fewer original insurers with family violence policies that address half or fewer of the elements recommended

17 out of the original 47 subscribers scored 5.5 out of 11 or less or 36% of subscribers. This is an improvement on 2021, which found 25 subscribers scored 5.5 or less – that is, a little over half.

Considering all 55 insurers examined in this audit, 22 subscribers scored 5.5 out of 11 or less (40% of subscribers). This includes three newly identified subscribers who scored 0 for not having a family violence policy available.

8 of the original 47 subscribers, and 4 of the newly identified subscribers scored 3 points or less, including Ansvar on 2.5 points, Mitsui Sumitomo on 2 points and Factory Mutual on 1 point.

Many of the policies that improved did so significantly

Of the 14 insurers whose family violence policies have been updated since 2021,

- 4 insurers increased their score by 5 points (Nib, QBE, QBE Lenders Mortgage and RACQ). Nib improved its score by 5 points to 10.5 as did RACQ to 10.
- Hallmark increased its score by 4.5 points from 2 to 6.5, and RAC by 4 points from 4.5 to 8.5 points.

- 2 family violence policies (4%) were updated but stayed the same score as that reported in the 2021 audit (Helia and NTI).
- 1 family violence policy was updated and moved backwards, namely RACT which decreased its score by 0.5 of a point from 8 to 7.5 points.

There were mixed results for newly identified subscribers

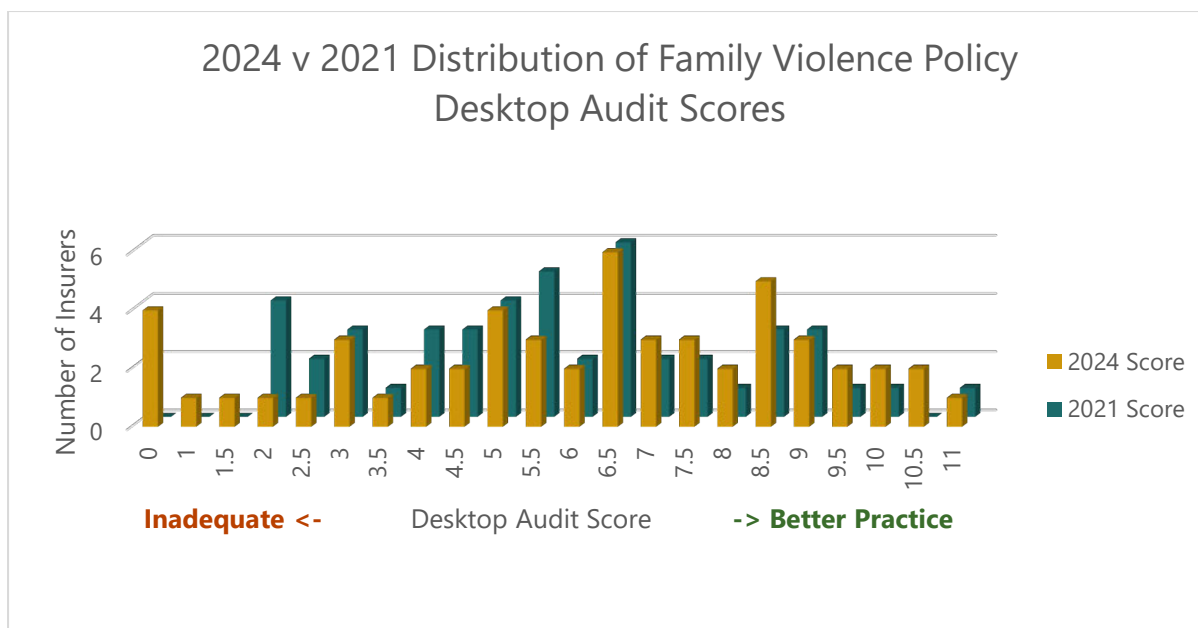
The results for newly identified insurers that have agreed to be bound by the General Insurance Code of Practice were mixed. As already noted 3 insurers did not appear to have policies. The range of scores for those that were located, ranged from 1 (ANZ Lenders Mortgage) to 9.5 out of 11 (The North of England Protecting and Indemnity Association Limited t/as Sunderland Marine).

Table 2: Newly identified subscribers ranked, 2024

Rank	Insurer	2024 Score
1	Sunderland Marine	9.5
2	Sompo Japan	8.5
=3	Pacific International	5
=3	XL	5
5	ANZ Lenders Mortgage	1.5
=6	Lawcover	0
=6	Factory Mutual	0
=6	HDI Global	0

Table 3: Top 10 of all current subscribers, 2024

Rank	Insurer	2024 Score	2021 Score
1	AssetInsure	11	11
=2	Nib	10.5	5.5
=2	Youi	10.5	9.5
=4	RACQ	10	5
=4	Tokio Marine	10	10
=6	Allianz	9.5	6.5
=6	Sunderland Marine	9.5	n/a
=8	Aioi	9	9
=8	Great Lakes	9	9
=8	Munich Re	9	9



Take-up rates of previously identified best practices

More quick exit buttons have been introduced

Since the last audit, many more insurers have quick exit buttons available. Including a large button to navigate quickly to another website can assist in providing a safe browsing environment for a consumer experiencing family violence.

Of the 55 insurers reviewed (which includes insurers that had no policy at all), 10 had quick exit buttons. All were checked and were functional. This equates to over 21% of the original 47 subscribers reviewed in 2021, and 20% of all 55 insurers reviewed this audit.

A small but significant increase in 'conduct of others' clauses

According to the ICA, there are 3 insurers - Suncorp, Allianz and IAG - who have now included 'conduct of others' clauses in their product disclosure statements.¹ This is significant, since they are 3 of the largest insurers in Australia. It is possible that there are

¹ AAMI, [Home Building Insurance Product Disclosure Statement](#), September 2020, p.96; Suncorp, [Home & Contents Insurance Product Disclosure Statement](#), November 2020, p.107; Allianz, [Understanding Family Violence and the role of car insurance](#); NRMA, [NRMA Home Insurance Product Disclosure Statement and Policy Booklet](#), September 2023, page 7, referenced at Page 5 Insurance Council of Australia, [Submission to the Inquiry into the financial services regulatory framework in relation to financial abuse in Australia](#), 13 June 2024

insurers beyond these three identified that also contain this clause, however Financial Rights were not able to confirm any further code subscribers.

"Conduct of others" clauses can go some way to addressing harms borne by the interaction of insurance exclusions and innocent victims of family violence. This occurs when a family violence perpetrator damages a home or a home's contents but the conduct activates a policy exclusion, because the damage is done by a family member.

This is an improvement on the single 'conduct of others' clause identified in the last audit.

Previous best practice recommendations

The 2021 desktop audit recommended a series of best practices to Code subscribers. Our audit made the following observations regarding the take-up or otherwise of those best practices:

- **Flagging customers experiencing family violence to avoid making people repeat their stories**
Youi now specifically states that a customer need only tell their insurer about their situation once, whereas some policies have been updated to reflect the Guide that the need to tell their story should be kept to a minimum.
- **Taking into account the affected customer's communication preferences**
Whilst not formally part of the audit, on inspection very few policies indicated that a customer's communication preferences could be nominated.
- **Including a link to the financial hardship application**
Many of the policies now address financial hardship applications and have links to the financial hardship page.
- **Providing names and contact details of available external support services**
Some insurers have improved in this respect, including varied services such as legal, medical and welfare, while some insurers only include minimal external support supports.
- **Reassuring customers their family violence situation will not hurt their claim**
Unfortunately, many of the policies do not give this assurance
- **Setting out the complaints procedure**
Many insurers now set out how complaints can be lodged although Financial Rights encourages all insurers to do so with a disclaimer that it will not affect the customer's policy or claim. Without a complaints process, insurers may not become aware of shortcomings of any policies until it is too late.

Recommendations

Key elements of the Guide should be included in the General Insurance Code itself

We continue to recommend that key elements of the Guide should be included in the General Insurance Code. This will remove the current lottery consumers experiencing family violence can face when seeking appropriate assistance from their insurer. The Code Governance Committee would be able to assess and monitor subscribers to ensure they are meeting the content expectations of a family violence policy.

All insurers should review and fully meet the form and content detailed in the Guide

All insurers should review their family violence policies to identify how their policies can meet best practice. AssetInsure's policy remains a best practice policy, which other insurers should take as an example to replicate. Achieving best practice across the sector would reflect community expectations of a strong approach by financial services to the scourge of family violence and financial abuse.

All new Code subscribers must meet the 2020 Code commitments on family violence

The Code Governance Committee should examine whether new insurers have met the 2020 Code requirements to have a publicly available family violence policy published on their website in line with Paragraph 95. Our audit found clear deficiencies and potential breaches that the Committee should follow up on.

All insurers should introduce identified best practices to their policies and their products and service design

There are clear opportunities for sector wide improvement. At a minimum we recommend the following:

- 'Conduct of others' clauses should be introduced in all relevant product disclosure statements.
- Quick exit buttons to safely navigate away from a family violence policy page should be introduced across the sector.
- Flagging customers experiencing family violence within claims handling systems to avoid their having to repeat stories.

- Enable customers experiencing family violence to have their gender preference in terms of service delivery met.
- Provide links to financial hardship within the family violence policy.
- Reassure consumers experiencing family violence that revealing such information will not hurt their claim.
- Set out a complaints procedure within the family policy for when things go wrong.

All insurers in run-off should subscribe to the General Insurance Code of Practice and adhere to a publicly available Family Violence Policy

Making the decision to unsubscribe to the General Insurance Code of Practice when an insurer is in run-off is a diminution of consumer protections for those who continue to hold insurance with these firms.

The General Insurance Code needs to explicitly address this situation and ensure that the rights of consumers who have purchased insurance products via a Code subscriber continue to hold these rights until they no longer hold the insurance.

About Financial Rights

Financial Rights is a community legal centre that specialises in helping consumers understand and enforce their financial rights, especially low income and otherwise marginalised or vulnerable consumers. We provide free and independent financial counselling, legal advice and representation to individuals about a broad range of financial issues. Financial Rights operates the National Debt Helpline, which helps NSW consumers experiencing financial difficulties. We also operate the Insurance Law Service which provides advice nationally to consumers about insurance claims and debts to insurance companies, and the Mob Strong Debt Help services which assist Aboriginal and Torres Strait Islander Peoples with credit, debt and insurance matters.

Appendix A: Methodology

The original benchmarking desktop audit

Financial Rights originally undertook a desktop audit of 47 General Insurance Code subscriber family violence policies in 2021. The aim of the audit was to examine whether subscribers' family violence policies addressed the 11 areas listed in the ICA's [Guide to helping customers affected by family violence](#) to be included in a family violence policy. The was to also identify best practice commitments to customers and benchmark the 47 policies to measure future improvements. Clause 17 of the Guide states that:

Each insurer should develop and implement a family violence policy that covers the following areas:

- a. make sure that safety is paramount for anyone affected by family violence*
- b. early recognition of family violence*
- c. training to improve employees' responses to someone affected by family violence*
- d. protecting private and confidential information of customers affected by family violence*
- e. minimising the number of times a customer affected by family violence needs to disclose information about family violence*
- f. ensuring appropriate and sensitive claims handling processes for claimants affected by family violence*
- g. ensuring collection arrangements are handled sensitively*
- h. arranging access to Financial Hardship help*
- i. informing customers, employees, distributors and service suppliers about information and assistance available to people experiencing family violence*
- j. referring customers, employees and distributors to specialist services*
- k. supporting employees and distributors who:*
 - (i) are affected by family violence; or*
 - (ii) experiencing vicarious trauma after serving affected customers.*

Policies were judged as to whether they addressed each of these areas comprehensively, partly addressed the area or did not address the area at all – scoring a 1, 0.5, or 0 respectively.

We subsequently developed a raw total score out of 11 for each family violence policy to assess the extent to which the policy meets the 11 areas outlined in the Guide.

Despite this, we observed that for some family violence policies, the raw score did not adequately reflect the quality of the policy either as a whole or when compared against other policies. While we decided to remain focussed on raw scores for consistency's sake, we have nevertheless indicated in the desktop audit notes, where we believe an adjustment to the raw score (be it up or down) would be warranted, to provide a clearer indication to insurers of the quality of the policy when compared to others.

We further identified best practice clauses that made positive commitments to victims of family violence.

This 2021 exercise was a point-in-time desktop audit of insurers' written policies, as of May 2021.

This audit was not an assessment of a subscriber's compliance with, and implementation of, their own family violence policy. Nor was it an evaluation of a subscriber's culture of supporting customers experiencing family violence, or a judgement on an insurer's internal policies that may or may not address the expectations of the [*Guide to helping customers affected by family violence*](#).

We would also note that insurers do not have the same range of product offerings. Having a good policy on paper is possibly easier when you are less likely to be called on to act on it because you only offer a narrow range of products. While it is possible for family violence to impact on someone's travel insurance claim, for example, in our experience it is much more common with home and motor vehicle policies, and the stakes are likely to be higher for the insurer.

The updated desktop audit

Financial Rights undertook the same approach to the 55 insurer subscribers identified, examining insurers' written policies, available as of 8 July 2024. 55 insurer subscribers includes all 47 originally benchmarked in 2021 and 8 new subscribers identified in 2024. Note that one insurer benchmarked in the original research, Commonwealth, was found to be no longer a subscriber.

Where an insurer was identified as not having updated their family violence policy this was noted, and no further analysis was undertaken.

Where an insurer was identified as having been reviewed and or updated their family violence policy, we analysed the new policy in line with the original approach (outlined above) and noted improvements and other changes.

Where a new insurer subscriber was identified, we worked to benchmark their family violence policy in line with the 2021 approach.

Furthermore, we examined whether the 55 insurer subscribers had included any of the best practices identified and recommended in the 2021 audit report.

Appendix B: Desktop audit of general insurance family violence policies, July 2024

Insurer	Unchanged or Updated	a. make sure that safety is paramount for anyone affected by family violence	b. early recognition of family violence	c. training to improve employees' responses to someone affected by family violence	d. protecting private and confidential information of customers affected by family violence	e. minimising the number of times a customer affected by family violence needs to disclose information about family violence	f. ensuring appropriate and sensitive claims handling processes for claimants affected by family violence	g. ensuring collection arrangements are handled sensitively	h. arranging access to Financial Hardship help	i. informing customers, employees, distributors and service suppliers about information and assistance available to people experiencing family violence	j. referring customers, employees and distributors to specialist services	k. supporting employees and distributors who: (i) are affected by family violence; or (ii) experiencing vicarious trauma after serving affected customers	Whether the webpage has a properly functioning 'Exit' button	Comment
1 AAI Limited	Unchanged	Original comment and score: 8.5/11 - Good policy that is easy to read and sets out majority of the information required by the Guidance.											No	
2 AI Insurance Holdings Pty Ltd	Unchanged	Original comment and score: 4/11 - Not a good policy as it merely provides commitment statements but does not actually outline steps taken by the business to address FDV. Customers are directed to contact their claims team for more information on the support services available. Given the sensitive nature of FDV, it would be better to have the information available to the customers than requiring them to have to speak with someone in order to access information.											No	
3 AIG Australia Limited	Unchanged	Original comment and score: 8.5/11* - Sound policy as it addresses majority of the requirements of the Guidance, however many areas contain general statements as opposed to information on specific measures in place. The policy sets out a complaints procedure for customers to lodge any complains with respect to their FDV policy. Whilst not a requirement of the Guidance, this would be good to implement as best practice. *Note, if we were to consider the policy as a whole against other policies, we would adjust the raw score to 6.5/11.											No	
4 Aioi Nissay Dowa Insurance Company Australia Pty Ltd	Unchanged	Original comment and score: 9/11* - Very good policy that provides detailed information about specific measures in place. It is also structured well so it is easy to locate information. *Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 10/11.											No	
5 Allianz Australia Insurance Limited	Updated (webpage suggests 2024)	Yes (1). Policy states that safety is prioritised.	Yes (1). Policy states that employees, agents etc receive training on how to identify the early signs.	Yes, partly (0.5). Policy states training is provided 'relevant to their roles' and also refers to specialised claims teams. Provides areas of some training but not all training.	Yes (1). Policy discusses confidentiality and includes ways information protected with examples including communicate.	Yes, partly. Only states that '[c]ase managers can minimise the number of times you need to disclose your situation'.	Yes (1). They can provide sensitive claims handling including fast tracking claims and providing emergency payments or accommodation. However, policy does not address the examples referred to in the 2021 review.	Yes (1). Policy states that they may keep a debt in house, buy back a debt, or defer or waive payments owed. This is an improvement from the 2021 review.	Yes (1). Policy states that financial support may include offering deferred or reduced payments and reduced or waived claims excess payments. They also mention that banks and utility companies can also offer support.	Yes (1). Policy provides a list of agencies and their services provided.	Yes (1). Policy includes contact various specialist services including legal.	Yes, partly (0.5). Policy outlines support to employees including training, additional leave and external referrals. Does not refer to distributors.	Yes - button diverts you to Google however can click back into policy	9.5/11 Improved from 2021 review (which was 6.5/11). A short but strong policy that touches on everything.

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6 Ansvar Insurance Limited	Unchanged	Original comment and score: 2.5/11 - Poor policy as it only provides general information and does not address many are as required by the Guidance.											No	
7 Arch LMI	Unchanged	Original comment and score: 5.5//11 - Addresses some of the Guidance, however, lacks detail and scope in its application. Needs considerable improvement.											No.	
8 Assetinsure Pty Limited	Unchanged - not needed	Original comment and score: 11/11- Very good policy as it is well structured with headings to match points required under the Guidance. The policy also sets out why each of the points are important and the specific measures in place by the business to address each issue.											No	
9 Auto & General Insurance Company Limited	Unchanged	Original comment and score: 4.5/11 - Not a good policy as it contains general statements of commitment, but does not provide detailed information about the specific measures in place when dealing with clients facing FDV.											No	
10 Berkshire Hathaway Speciality Insurance Company	Unchanged	Original comment and score: 7.5/11* - Sound policy as it includes statements addressing the requirements of the Guidance, but does not actually provide information on how these are done in practice. *Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 7/11.											No	
11 Catholic Church Insurance Limited	Removed - no longer providing General Insurance	Yes (1). The statement is made within the landing page although policy cannot be accessed.	-	-	-	-	-	-	-	-	-	-	No	1/11 Link to previous policy no longer exists.
12 Chubb Insurance Australia Limited	Unchanged	Original comment and score: 8.5/11 - Overall a good policy that provides detailed information about the processes in place to deal with customers experiencing family violence. The structure could be improved so that it is easier to read with further subheadings.											No	
13 Commonwealth Insurance Limited	Removed - General Insurance products sold to Hollard	Commonwealth Insurance Ltd sold to Hollard in October 2022 and is no longer a subscriber to the Code of Practice.												

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14 Cover-More Insurance Services Pty Limited	Unchanged despite being reviewed in March 2022	Original comment and score: 7/11 - Sound policy, although a number of points are covered only in broad terms.											No	
15 Credicorp Insurance Pty Limited	Unchanged	Original comment and score - 3/11 - Poor policy, failing to address a lot of the Guidance.											No	
16 Defence Service Homes Insurance Scheme	Unchanged	Original comment and score - 6.5/11* - Sound policy although fails to cover some aspects of the Guidance and covers some aspects in broad terms only. *Note: If we were to consider the policy as a whole against other policies, we would adjust the raw score to 6/11.											No	
17 Domestic and General	Unchanged despite policy stating review was due June 2021	Original comment and score: 3/11* - Vague policy which fails to apply to Guidance effectively, if at all. Requires much more detail and breadth in its coverages. Needs to reflect the Guidance more holistically. *Note. If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 2.5/11.											No.	
18 Eric Insurance Limited	Removed	Eric's website provides notice to customers that as of 1 September 2024 they will no longer subscribe to the Code as it exits the general insurance market.											No	
19 Helia Group (formerly Genworth Financial Mortgage Insurance Pty Limited)	Updated in 2022	No (0). There is no statement to this effect.	Yes, partly (0.5). While it does not refer to early recognition, the policy states that employees are trained to have conversions with customers affected or potentially affected by family violence and to	Yes (1). All employees receive training to ensure awareness of the policy and how to identify and deal with customers potentially impacted by family violence. The policy notes	Yes, partly (0.5). The policy has a part dealing with is, noting personal information will never be provided to a third party without express consent including on joint accounts, and	Yes (0.5). The policy explains why it is important to minimise the number of times a customer has to disclose their family violence circumstances, but not how this is achieved.	Yes (1). The policy has a section dedicated to this criterion with a link to the ICA's Guide. The policy also states that <i>'we will not refer or sell that debt to a third-party debt collection agency'</i> and that	Yes (1). See (f).	No (0). This is not referred to in the policy.	Yes (1). A number of support services are listed nationally and by state.	Yes (1). The policy notes that employees are not generally equipped to help with such matters outside the scope of insurance matters so may refer to the	No (0). The policy states that the policy is in respect to process structured to support people <i>'other than employees'</i> . There appears to be a separate policy for employees.	No. The policy is a PDF download rather than a webpage.	6.5/11* This policy was reviewed its name changed in November 2022 but the score remains the same.

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			appropriate triage matters.	it is part of the new employee induction training.	that there are strict controls over collection, storage, access and use of the personal information.		they perform due diligence on agencies to ensure they have appropriate practices to interact with customers.				bodies referred to in (i).			
20 Great Lakes Insurance SE - Munich Re	Unchanged	Original comment and score: 9/11 - Good policy but requires clarity. * NB: policy previously only applies to retail insurance products											No	
21 Guild Insurance Limited	Unchanged	Original comment and score: 4/11* - Poor policy. While most aspects of the Guidance are covered, it is only in very broad terms. *Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 3/11.											No	
22 Hallmark General Insurance Company Limited	Updated in April 2024	No (0). There is no statement which indicates that safety is paramount	Yes, partly (0.5). The policy notes that staff are trained to identify potential indicators of FDV and how they may assist. It does not provide specifics as to how this is achieved.	Yes, partly (0.5). Again the policy notes there is training for employees but it does not provide any details as to how often or what this includes.	Yes (1). The policy highlights that the protection of privacy is important and provides examples of how they do this and also include a link to their privacy policy.	Yes, partly (0.5). The policy notes that it will minimise the need for customers to repeat information but it does not provide examples of how this is achieved.	Yes, partly (0.5). The policy states that claims are handled with sensitivity and care but there are no details as to how this is achieved	No. (0). There is no refence in the policy	Yes, partly (0.5). If a customer experiences financial hardship there are several options available to the customer including transferring to a special hardship team. Whilst a specialist team is a good idea, there is the risk that the customer will need to reveal the same information rather than stay	Yes (1). There is a comprehensive list of external support services available in both Australia and New Zealand listed with phone numbers and links to websites.	Yes. (1). A range of specialist services, legal, social and counselling are listed.	Yes (1). The policy outlines some of the support measures that are in place for employees including EAP, flexible working arrangements etc.	No	6.5/11 This policy was updated on 11 April 2024 and has greatly improved since the last review in which it scored 2/11 There are however a number of areas that could be improved.

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23 Insurance Australia Limited	Updated (website suggests 2024)	Yes. (1) The policy notes at the top that safety is their priority and refers people to 000 if there is an immediate threat. They also note that safety is paramount and that they will discuss options on how they can get support	Yes, partly. (0.5) Relevant employees will be trained to understand and support customers by recognising signs they may be experiencing FDV and that it may continue into the future. However, no specifics provided.	Yes. (1) Training includes understanding trauma and how it can look and to listen without judgment. No indication of how often the training occurs.	Yes, partly. (0.5) Employees will be trained in protecting personal information but there are no details of how this will occur. There is no other mention of privacy in the policy.	No. (0) The policy notes that employees will be trained how to assist customers by minimising the number of times information needs to be disclosed and avoiding repeatedly disclosure. There are however no details of how this will occur. It also states that the employee has been trained to refer a customer to a specialist team where appropriate.	Yes, partly. (0.5) The policy states that claims will be managed sensitively and notes that there may be complexities for customers. It is however noted that they may be transferred to a specialist team which means repeating information that they have likely already provided.	Yes. (1) The policy notes that collections will be handled with care. They also note that if a referral has been made to a debt collection agency and they become aware of violence, their internal team will work with the collection agency to support the customer	Yes. (1) The policy outlines a number of ways in which support may be provided if the customer is in financial hardship.	Yes, partly. (0.5) The policy states that employees will be trained to refer a customer to other services if appropriate. The only services listed are 1800 RESPECT and Full Stop Australia.	Yes. (1) There is a list of trusted service providers including telephone numbers and links to websites where customers may be referred to.	Yes. (1) The policy notes that there are services available for employees to access. They also note that there is an internal FDV policy.	Yes - button takes you to Google with no option to go back to policy (which is a good feature).	8/11 This policy has been updated and improved since the last review in which it scored 5/11 or an adjusted score of 5.5/11. It appears the policy now covers, in part most of the Guidance albeit still quite briefly in parts.
24 Insurance Manufacturers of Australia Pty Limited	Updated - see Insurance Australia Limited													
25 LFI Group Pty Limited	Unchanged	Original comment and score: 4.5/11* - Poor policy without any practical information on how the policy works. *Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 2/11.											No	

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26 Lloyds	Unchanged despite review in March 2024	Original comment and score: 3.5/11 - Policy is vague in its application of the Guidance. Some areas of the Guidance are not dealt with at all. Improvements are required regarding level of detail and processes to be implemented to ensure the Guidance is complied with in practice.											No.	
27 Mitsui Sumitomo Insurance Co Limited	Unchanged	Original comment and score: 2/11* - Poor policy that only covers a few aspects of the Guidance in very broad terms. *Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 1/11.											No	
28 Munich Re	Unchanged - see Great Lakes													
29 Nib Travel Services Australia Pty Limited	Updated at April 2024	Yes. (1) States safety is paramount.	Yes. (1) Policy acknowledges importance of early recognition and steps taken to train staff to identify.	Yes. (1) Training provided - via coaching or other means, to all employees and service suppliers who engage with customers or manage employees doing so, to recognise Family and Domestic Violence early, how to deal with private information, financial hardship and referrals to external resources.	Yes. (1) Provides specific measures that can be taken to protect privacy and confidentiality.	Yes. (1) The policy notes that repeated disclosure will be minimised through the provision of a dedicated employee or team for contact.	Yes. (1) Policy lists the ways that appropriate and sensitive claims handling processing will be undertaken at clause [4].	Yes. (1) Specifically refers to how collection arrangements will be managed before and after referral to a third party.	Yes. (1) Clause 5 addresses financial hardship, including a fast track process where needed.	Yes. (1) Clause 6 refers to employee support, whether personally or vicariously effected. Employee Assistance Program also available.	Yes. (1) Lists a number of support services available and that they will work with the customer to find a suitable one to proceed with.	Yes, partly. (0.5) Clause 6 goes to this in broad terms but does not specifically reference (i) or (ii).	No	10.5/11 A strong policy that addresses all criteria. A vast improvement on the 2021 policy which scored 5.5/11.
30 NTI Limited	Updated (website)	Original comment and score: 6/11* - Poor policy that refers to the Guidance in only very broad terms with no specifics provided.											No	

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	suggests 2024) but effectively the same (additional sentences)	*Note: If we were to review the policy as a whole and against other policies, we would adjust the raw score to 2/11.												
31 Open Insurance Pty Ltd	Unchanged	Original comment and score: 6.5/11* - While the policy addresses every aspect of the Guidance, it is only in very general terms. *Note: if we were to consider this policy as a whole and as against other policies, we would adjust the raw score to 3/11.											Yes - it takes you to the Bureau of Meteorology website	
32 PD Insurance Agency Pty Ltd	Unchanged	Original comment and score: 5.5/11* - Poor policy which generally referring to most aspects of the Guidance without any specifics. *Note: if we were to consider the policy as a whole and against other policies, we would adjust the raw score to 4.5/11.											No.	
33 Petsure (Australia) Pty Ltd	Unchanged	Original comment and score: 7.5/11* - Sound policy although more information on how their policy will be delivered is required. *Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 7/11.											No.	
34 QBE Insurance (Australia) Limited	Updated (website suggests 2024)	Yes, partly (0.5). States that safety and wellbeing of customer and family members comes first.	Yes, partly (0.5). Notes training provided for early recognition but no specific details provided.	Yes, partly (0.5). Notes training provided to help recognise early signs of domestic violence and respond with compassion. No specific details of the training provided.	No. (0). Not mentioned outside of a general privacy statement.	Yes, partly (0.5). Mentioned briefly, but in the context of 'How can we help' with no specifics as to the actual implementation.	Yes, partly. (0.5). Mentioned verbatim in the 'How can we help' section. No specific provisions.	Yes, partly (0.5). States that if a person has been affected by family and domestic violence, they may be eligible to have their outstanding debts deferred, reduced or waived, but there is no further detail about this. Improvement on 2021 version, as	Yes (1). Notes that financial hardship support may be available, with examples as to the assistance that may be provided, together with a link to QBE's general financial hardship page and contact number for the National Debt Helpline.	Yes (1). The policy states to call 000 in an emergency situation and 1800 RESPECT for additional information and support, as well as a specialist list of services with contact numbers and websites. Improvement on 2021 version, as it did not address this at all.	Yes (1). List of support services included.	Yes (1). Notes measures in place to support employees through EAP and external support services. No specific mention of support for employees experiencing vicarious trauma or for distributors.	Yes - takes you to Google and unable to go back to policy, which is a good feature.	7/11 A much-improved policy from that which scored 2/11 in 2021 however requires further developments.

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								this was not mentioned at all	Similar to 2021 version.					
35 QBE Lenders' Mortgage Insurance Ltd	Updated (website suggests 2024) - see QBE Insurance (Australia) Limited above													
36 RAA Insurance Pty Ltd	Unchanged	Original comment and score: 3/11* - The policy is in quite general terms but there is further information on their website. It would be better that the information is centralised. *Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 4/11.											Yes, on main page not policy document, which takes you to Google without ability to go back to policy, which is a good feature.	
37 RAC Insurance Pty Ltd	Updated (website suggests 2024)	Yes, partly (0.5). The policy does not quite go as far as to say safety is paramount, noting "the safety of members is a priority and particularly important in the event	No (0). The policy does not address this.	Yes (1). Training provided to employees, provides an overview of topics covered in training and noting the frequency training is provided.	Yes (1). Privacy section states private and confidential handling of personal information and sets out how this will occur.	Yes (1). States a flag can be placed on the member's record to minimise need for members to repeat specific circumstances of Family and Domestic Violence. Improvement on 2021 version.	Yes, partly (0.5). There is a section dedicated to sensitive claims handling, but it does not provide detail as to how this occurs. No change from 2021 version.	Yes (1). There is a section dedicated to collection arrangements and sets out in detail how this will be dealt with in a sensitive manner.	Yes (1). There is a section dedicated to financial hardship and it sets out in detail how assistance can be provided.	Yes, partly (0.5). RAC will engage with member to gain a better understanding of needs and provides details of assistance options; however, it does not state what the options are.	Yes (1). Provides a list with names and contact details of external support organisations.	Yes (1). There is a section dedicated to support that can be provided.to employees and authorised representatives and it sets out in detail the support that can be provided.	No.	8.5/11 Significant improvement on score of 4.5/11 from 2021 review. Some of this information is contained on the website and it would be beneficial to centralise the information that

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38 RACQ Insurance Limited	Updated at December 2023	someone is experiencing family violence." Yes, partly (0.5). States that they 'can assist victims and ensure we keep their safety as a priority'.	Yes, partly (0.5). States that they provide training in early detection of Family and Domestic Violence but not how that is achieved.	Yes (1). Ongoing training provided 'relevant to their roles' on several topics including Family and Domestic Violence. 'Hypercare Claims team and distribution and Support Hub team' have higher levels of training.	Yes (1). The policy sets out ways in which information is protected.	Yes (1). Minimising disclosure is specifically referred to; case managers assigned to assist this being met.	Yes (1). Policy refers to sensitive claims handling include appointment of a Hypercare Claims Consultant as a singular point of contact.	Yes (1). Sets out how debt collection can be dealt with sensitively.	Yes (1). Provides methods by which financial hardship assistance can be provided.	Yes (1). In addition to providing a list of providers, the policy notes there are additional was support can be provided if RACQ is made aware of Family and Domestic Violence situations and refers to additional ways in which members experiencing vulnerability can be assisted.	Yes (1). Detailed list of specialist service providers.	Yes (1). Sets out how support is provided including reference to a specialised Family and Domestic Violence Support Procedure.	No.	10/11 A strong policy significantly improved since 2021 review which was 5/11 (or if adjusted 5.5/11).
39 RACT Insurance Pty Ltd	Updated but backwards (website suggests 2024)	No (0). Not addressed.	No (0). Not addressed.	Yes (1). The policy notes that training is provided to the employees and distributors and service provides 'to address hardship and vulnerability with the utmost	Yes (1). The policy notes that there are measures in place to handle personal information in addition to the Privacy Policy. This include updating of	Yes, partly (0.5). The policy refers to this but does not set out how it is done.	Yes (1). Provides examples of vulnerable people and how they can be assisted generally and, while there is no specific section regarding domestic and	Yes (1). Members experiencing financial hardship will have their debts held in abeyance or released (although this is not specific to family and	Yes (1). Sets out in detail how assistance can be provided when a person is experiencing financial hardship.	Yes (1). Notes referrals can be made and provides a list of services, together with contact details.	Yes (1). Comprehensive list with contact details provided.	No (0). Not addressed.	No.	7.5/11 The policy has slightly gone backwards since the 2021 review which had received a score of 8/11 (and which is no longer available).

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				<i>respect, privacy and compassion, providing you with alternate solutions'. It further notes that when dealing with this insurer, you will be speaking with someone who has been trained to support those affected.</i>	details, how the customer receives documents and payments, how information may need to be disclosed but that they will work with the customer to address safety concerns.		family violence, the vulnerability section and financial hardship section details a number of processes in place.	domestic violence but encapsulates it).						The policy forms part of the general "Vulnerability and Financial difficulty" page on the website, not a specific Family and Domestic Violence policy.
40 Southern Cross Benefits Limited t/a Southern Cross Travel Insurance	Updated at 7 May 2024	Yes, partly (0.5). Policy states that it trains its employees to recognise Family and Domestic Violence and to understand safety is paramount for anyone affected by Family and Domestic Violence; but does not state that safety is paramount for the insurer.	No (0). States that employees are trained to recognise instances of Family and Domestic Violence but does not refer to early recognition. Otherwise encourages Family and Domestic Violence victims to disclose and ask for help.	Yes, partly (0.5). Refers to training employees to recognise Family and Domestic Violence and to understanding safety is paramount but otherwise provides no further information on the point.	Yes, partly (0.5). States it will protect private and confidential information of customers affected by Family and Domestic Violence but does not explain how.	Yes, partly (0.5). Refers to minimising times a customer affected by Family and Domestic Violence needs to disclose but no detail provided.	Yes, partly (0.5). Refers to appropriate and sensitive handling of claims for people affected by Family and Domestic Violence but no detail provided.	No (0). Not addressed.	Yes, partly (0.5). States that they may be able to assist with financial hardship support including payment options or temporary placing a hold on recoveries.	Yes (1). Asks that SCTI be advised of incidents of Family and Domestic Violence so that processes can be put in place and sets out how vulnerable customers generally will be assisted. List of specialist service providers also included.	Yes (1). List with contact details provided.	No (0). Not addressed.	No.	5/11 Not a significant improvement to the 2021 policy that scored 4/11. The policy requires greater detail in almost all areas to ensure compliance. The policy is a general "Vulnerable Customers" policy, so some of the information is for vulnerable people generally, and not specifically related to Family

Insurer	Unchanged or Updated	a. make sure that safety is paramount for anyone affected by family violence	b. early recognition of family violence	c. training to improve employees' responses to someone affected by family violence	d. protecting private and confidential information of customers affected by family violence	e. minimising the number of times a customer affected by family violence needs to disclose information about family violence	f. ensuring appropriate and sensitive claims handling processes for claimants affected by family violence	g. ensuring collection arrangements are handled sensitively	h. arranging access to Financial Hardship help	i. informing customers, employees, distributors and service suppliers about information and assistance available to people experiencing family violence	j. referring customers, employees and distributors to specialist services	k. supporting employees and distributors who: (i) are affected by family violence; or (ii) experiencing vicarious trauma after serving affected customers	Whether the webpage has a properly functioning 'Exit' button	Comment
														and Domestic Violence.
41 Swiss Re International SE	Unchanged	Original comment and score: 6/11* - The policy covers the different aspects of the Guidance but only in general terms. *Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 5.5/11.											No.	
42 The Hollard Insurance Company Pty Ltd/Hollard Insurance Partners Limited	Unchanged - see Open Insurance above													
43 The Tokio Marine & Nichido Fire Insurance Co Ltd	Unchanged	Original comment and score: 10/11 - Very good policy addressing in detail most aspects of the Guidance.											No.	
44 Virginia Surety Company, Inc	Unchanged	Original comment and score: 5.5/11* - Addresses most of the Guidance but only in very general terms. *Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 5/11.											No.	
45 Westpac General Insurance Limited	Unchanged	Original comment and score: 5/11* - While various aspects of the Guidance are addressed, the safety and security in the policy is questionable. *Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 3/11.											Yes - on web page - button takes you to Google and if you go back it takes you to Westpac's home page only.	
46 Youi Pty Ltd	Updated in February 2024	Yes (1). Specifically states that safety and	Yes (1). The Policy notes that they ' <i>will be vigilant for signs</i>	Yes (1). All employees are made aware of	Yes (1). Employees should check that information is	Yes (1). They will not require a customer to	Yes (1). Clients are referred to the	Yes (1).	Yes (1). Mentioned that they have access to them.	Yes partly. (1). Employees and suppliers are made aware of	Yes (1). The policy states that procedures must be in place	Yes (1). States that employees can make a	No.	10.5/11 A very good policy, significantly

Insurer	Unchanged or Updated	a. make sure that safety is paramount for anyone affected by family violence	b. early recognition of family violence	c. training to improve employees' responses to someone affected by family violence	d. protecting private and confidential information of customers affected by family violence	e. minimising the number of times a customer affected by family violence needs to disclose information about family violence	f. ensuring appropriate and sensitive claims handling processes for claimants affected by family violence	g. ensuring collection arrangements are handled sensitively	h. arranging access to Financial Hardship help	i. informing customers, employees, distributors and service suppliers about information and assistance available to people experiencing family violence	j. referring customers, employees and distributors to specialist services	k. supporting employees and distributors who: (i) are affected by family violence; or (ii) experiencing vicarious trauma after serving affected customers	Whether the webpage has a properly functioning 'Exit' button	Comment
		confidentiality is paramount.	<i>of possible DFV. DFV is challenging to identify. However there are signs of possible DFV...'</i>	the Policy in induction. Mandatory awareness training. Designated Family and Domestic Violence responders complete specialist training. Managers are trained on how to recognise and conduct conversations around Family and Domestic Violence as well as where to direct employees. Service providers must be made aware of who they are to inform in the event a disclosure from a customer is received.	sent in a safe way. They will also check that all contact information on the account is accurate, to confirm that the abuser's information is not listed. They will discuss options with clients about additional steps. Ensure the client knows who is authorised on the policy and offers to remove an authorised representative. Ensure the client's new details are kept private when they need to change their contact details. Discuss with the client any additional account and ID check security measures they may wish to implement.	explain that they are experiencing domestic and family violence more than once. Their case will be flagged as being case managed, and they will be referred to the Priority Assistance Team.	Priority Assistance Team. Policy premium pricing can be discussed if an increase is due to the violent actions of another. Can review rejections and tenancy vacation decisions. Flexibility around documentation. Employees must check how clients wish to proceed.	Cash settlements of a claim can be arranged. Arrangements are 'established' with debt collection agencies so if they become aware of family violence, they must inform Youi.	Hardship policies can be applied 'flexibly' on a case-by-case basis and fast tracked.	the policy, and referral organisations. Employees are to refer clients who make disclosure to external support agencies for non-general insurance matters.	for employees to know how to respond to customer disclosures, and procedures should be in place for service providers to know how to respond to these disclosures. The policy does not specify the procedures.	disclosure of family violence to their direct manager, 'ExCo member' or human resources'. However it only says that 'procedures must be in place without specifying what these are. Zero tolerance workplace, including for offensive jokes and behaviour. Whistleblower Policy in place. Assurance of no adverse action or discrimination for employees. Understanding and reviews for an employee whose work is impacted by family violence. Employees can take leave, including 'family and domestic violence leave'; request flexible		improved since last review which scored 9.5, addressing all areas of the Guidance in detail.

Insurer	Unchanged or Updated	a. make sure that safety is paramount for anyone affected by family violence	b. early recognition of family violence	c. training to improve employees' responses to someone affected by family violence	d. protecting private and confidential information of customers affected by family violence	e. minimising the number of times a customer affected by family violence needs to disclose information about family violence	f. ensuring appropriate and sensitive claims handling processes for claimants affected by family violence	g. ensuring collection arrangements are handled sensitively	h. arranging access to Financial Hardship help	i. informing customers, employees, distributors and service suppliers about information and assistance available to people experiencing family violence	j. referring customers, employees and distributors to specialist services	k. supporting employees and distributors who: (i) are affected by family violence; or (ii) experiencing vicarious trauma after serving affected customers	Whether the webpage has a properly functioning 'Exit' button	Comment
												working arrangements, take paid or unpaid personal/carer's leave in certain circumstances or access Employment Assistance Program. Also having Courts list the workplace included in a Domestic Violence Order. Role adjustments or supports, such as change to working hours, job redesign or change of duties, change of work contact details or patterns of work. No mention of vicarious trauma.		
47 Zurich Australia Insurance Limited	Unchanged, except for cosmetic changes	Original comment and score: 6.5/11* - Addresses much of the Guidance in at least partial detail however it needs improvement. *Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 7/11.											No.	
48 ANZ Lenders Mortgage Insurance Pty Ltd	New member	No (0). There is no statement to	No (0). The policy does not discuss how the	No (0). The policy does not indicate	No (0). The policy states 'we'll do our best	No (0). The policy does not refer to	Yes, partly (0.5). The policy notes that the insurer	No (0).	Yes, partly (0.5). The policy has a link to 'Apply for	No (0).	Yes, partly (0.5).	No (0).	Yes - it takes you to the Google landing page	1.5/11 This policy is brief and does

Insurer	Unchanged or Updated	a. make sure that safety is paramount for anyone affected by family violence	b. early recognition of family violence	c. training to improve employees' responses to someone affected by family violence	d. protecting private and confidential information of customers affected by family violence	e. minimising the number of times a customer affected by family violence needs to disclose information about family violence	f. ensuring appropriate and sensitive claims handling processes for claimants affected by family violence	g. ensuring collection arrangements are handled sensitively	h. arranging access to Financial Hardship help	i. informing customers, employees, distributors and service suppliers about information and assistance available to people experiencing family violence	j. referring customers, employees and distributors to specialist services	k. supporting employees and distributors who: (i) are affected by family violence; or (ii) experiencing vicarious trauma after serving affected customers	Whether the webpage has a properly functioning 'Exit' button	Comment
		this effect within the policy.	business will recognise early signs of family violence, but lists warning signs for customers to consider regarding whether they are affected by financial abuse.	whether training is provided to improve employees' responses to a person affected by family violence.	<i>to keep your contact with us confidential</i> ' but does not state how this is achieved. Further, the policy has a link ' <i>Protect your financial information</i> ' which is a general information page and does not provide information specific for persons affected by family violence.	disclosure requirements.	will ' <i>treat you with sensitivity, respect and care</i> ' but not how this achieved.	The policy does not address this at all.	<i>assistance due to financial difficulty</i> ' page but otherwise does not address this from a family violence perspective.	This is not mentioned within the policy.	The policy reference to 1800 RESPECT only.	This is not addressed within the policy.	and opens another tab for the Bureau of Meteorology. There is also a notation on the ANZ family violence support page regarding 'staying safe online' and encourages its customers to erase browsing history and use private browsing mode.	not meet any criterion in full. The Quick exit feature is good.
49 Factory Mutual Insurance Company	New member	A family violence policy was unable to be located.												
50 HDI Global Specialty SE - Australia	New member	The policy was unable to be located. On the page ' <i>Australia: Support for Vulnerable Customers</i> ', it was noted that readers could access the Family Violence & Supporting Vulnerable Customers Policy. On accessing the ' <i>Support for vulnerable customers</i> ' there was a link to the family violence policy which took the reader back to the page ' <i>Australia: Support for Vulnerable Customers</i> '. While the policy might be available on the website, there was difficulty in locating it.												
51 Lawcover Insurance Pty Ltd	New member	Unable to be located on their website.												
52 Pacific International Insurance Pty Ltd	New member	No (0). Not mentioned	Yes, partly (0.5). The policy expressly states that training is provided to	Yes, partly (0.5). The policy refers to training but not what that	Yes, partly (0.5). The policy states ' <i>developing and applying</i>	Yes, partly (0.5). The policy states that this is an objective of the	Yes, partly (0.5). The policy refers to ' <i>appropriate response to</i>	Yes, partly (0.5). The policy refers to sensitive claims and	Yes, partly (0.5). The policy notes an aim is to assist with access to	Yes, partly (0.5). The policy notes that the policy applies to ' <i>those</i>	Yes, partly (0.5). The policy has a 'Frequently Asked Questions'	Yes, partly (0.5). The policy notes that the policy applies to ' <i>those</i>	No.	5/11* While the policy touches on most of the Guidance,

Insurer	Unchanged or Updated	a. make sure that safety is paramount for anyone affected by family violence	b. early recognition of family violence	c. training to improve employees' responses to someone affected by family violence	d. protecting private and confidential information of customers affected by family violence	e. minimising the number of times a customer affected by family violence needs to disclose information about family violence	f. ensuring appropriate and sensitive claims handling processes for claimants affected by family violence	g. ensuring collection arrangements are handled sensitively	h. arranging access to Financial Hardship help	i. informing customers, employees, distributors and service suppliers about information and assistance available to people experiencing family violence	j. referring customers, employees and distributors to specialist services	k. supporting employees and distributors who: (i) are affected by family violence; or (ii) experiencing vicarious trauma after serving affected customers	Whether the webpage has a properly functioning 'Exit' button	Comment
		within policy whatsoever.	enable early recognition of family violence but does not elaborate.	training involves and to whom it is provided.	<i>protocols and practices to ensure the protection of personal information - above and beyond existing Privacy and Security controls where necessary</i> but does not elaborate.	policy but does not elaborate on how this is achieved.	<i>support a vulnerable person</i> and <i>'ensuring the that processes for claims and debtor management are appropriate and sensitive to the needs of affected customers'</i> but does not elaborate. In 'Frequently Asked Questions' it states that claims can be fast tracked and invites customers to make contact to enquire on the process.	collection handling but does not elaborate.	financial hardship provisions and help but does not elaborate on how this achieved. In 'Frequently Asked Questions' it invites customers to enquire directly by phone or email.	<i>who experience vicarious trauma after supporting affecting individuals</i> '.	section which notes external support services but does not list as many as other insurers' policies.	<i>who experience vicarious trauma after supporting affecting individuals</i> '.		it is only in very brief terms. *Note: If we were to consider the policy as a whole and against other policies, we would adjust the raw score to 3/11.
53 Sampo Japan Insurance Inc	New member	No (0). There is no statement to this effect within the policy.	No (0). There is no statement regarding early recognition of family violence, rather the policy refers to disclosures of family violence.	Yes (1). The policy notes that all customer-facing staff receive awareness training. Further, the policy refers to <i>'dedicated employees specifically trained to assist customers affected by family violence'</i> .	Yes (1). The policy states it is understood that protecting personal information is critical to safety and that they have mechanisms, in addition to their Privacy Policy, to discuss safe ways to communicate and record	Yes (1). The policy states that measures include <i>'minimising the number of times you need to disclose your situation by having dedicated employees specifically trained to assist customers'</i>	Yes (1). The policy state that support will be provided throughout the claims process which may include fast-tracking the claim, energy payments or accommodation, and/or reviewing decisions where there may be	Yes (1). The policy states that they can support customers by suspending or deferring collections activities.	Yes (1). The policy states they may offer financial hardship assistance, including deferred premiums or waiving excesses. The policy encourages the customer to talk to the business if there is a debt	Yes (1) The policy lists a number of external services that can be accessed for assistance.	Yes, partly (0.5). The policy states that customers may be referred to appropriate support agencies. Does not refer to employees and distributors being referred.	No (1). The policy does not refer to support for employees or distributors.	No.	8.5/11* It is a sound policy that addresses a lot of the Guidance. It does not extend to employees and distributors. *Note: If we were to assess the policy as a whole and against other polices, we

Insurer	Unchanged or Updated	a. make sure that safety is paramount for anyone affected by family violence	b. early recognition of family violence	c. training to improve employees' responses to someone affected by family violence	d. protecting private and confidential information of customers affected by family violence	e. minimising the number of times a customer affected by family violence needs to disclose information about family violence	f. ensuring appropriate and sensitive claims handling processes for claimants affected by family violence	g. ensuring collection arrangements are handled sensitively	h. arranging access to Financial Hardship help	i. informing customers, employees, distributors and service suppliers about information and assistance available to people experiencing family violence	j. referring customers, employees and distributors to specialist services	k. supporting employees and distributors who: (i) are affected by family violence; or (ii) experiencing vicarious trauma after serving affected customers	Whether the webpage has a properly functioning 'Exit' button	Comment
					personal information.	<i>experiencing family violence</i> '.	ambiguity about the customer's cover.		for unpaid premium.					would adjust the raw score to 7.5/11.
54 The North of England Protecting and Indemnity Association Limited t/as Sunderland Marine	New member	Yes (1). The policy states ' <i>[o]ur 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 and we are committed to supporting you</i> '. 	Yes, partly (0.5). The policy notes that they promote and facilitate early recognition, including the signs of Family and Domestic Violence, but not how this is achieved.	Yes (1). The policy states that both employees and third-party providers are trained ' <i>at appropriate intervals</i> ' to deal with such customers and claims. The policy indicates the matters for training.	Yes, partly (0.5). The policy refers to the importance of keeping the customer's information private and secure and refers to the Privacy Policy.	Yes (1). The policy states that they will assist customers by minimising the need to disclose the circumstances several times in the policy, including by training of staff	Yes (1). The policy states that they ' <i>will work with you to agree a suitable, sensitive and compassionate way to proceed</i> ' and ' <i>arranging financial hardship help where appropriate</i> '.	Yes (1). They will fast track financial hardship requests, provides options to retain policies where premiums cannot be paid, minimise information and documents required, not require evidence of an intervention order, and not involve third party debt collection agencies.	Yes (1). The policy states that the will help to arrange access to financial hardship assistance.	Yes (1). The policy lists and number of support services available.	Yes (1). The policy notes that they can assist by referral to specialist services.	Yes, partly (0.5). The policy notes that they will support employees and distributors affected by family violence and inform them of support services. The policy does not refer to vicarious trauma.	No. The ' <i>Additional Support for Customers</i> ' states ' <i>if you are concerned about anyone else seeing that you have looked at this page, you can set your browser to "in private" mode. Usually this is available from a drop down menu in the top right hand corner of your browser.</i> '	9.5/11 A very good policy that addresses all the criteria. The policy would be improved by having a 'Quick exit' button, including reference to vicarious trauma of employees and setting out what further steps are taken to ensure private and confidential information is kept safe.
55 XL Insurance Company SE <i>NB the policy applies to customers who have purchased a retail product only</i>	New member	No (0). No statement to this effect.	Yes (1). The policy states that training is provided on how to identify the signs of family and domestic violence and that the claims team is trained to look for signs of violence.	Yes (1). The policy refers to training provided to all staff and service providers ' <i>who engage or make decisions relating to relevant customers</i> ' which covers the nature	Yes (1). The policy notes that they will engage with affected customers to determine preferred methods of communication, and the customer	No (0). The policy does not refer to disclosure of family violence.	Yes, partly (0.5). The policy refers to the training provided to staff and service suppliers to ensure customers are dealt with effectively and appropriately but not how that is	No (0). Does not refer to collection arrangements whatsoever.	Yes, partly (0.5). The policy states that they will work with the customer (or the insurance broker) to identify the type of assistance that best suits the customer's	Yes (1). Various support services are listed in the policy.	No (0). The policy does not state that customers may be referred to support services.	No (0). The policy does not appear to extend to staff or distributors experience family and domestic violence personally or vicariously.	No. 	5/11* The policy is very brief and does not address the Guidance in full. The policy should explicitly apply to staff and distributors and should

Insurer	Unchanged or Updated	a. make sure that safety is paramount for anyone affected by family violence	b. early recognition of family violence	c. training to improve employees' responses to someone affected by family violence	d. protecting private and confidential information of customers affected by family violence	e. minimising the number of times a customer affected by family violence needs to disclose information about family violence	f. ensuring appropriate and sensitive claims handling processes for claimants affected by family violence	g. ensuring collection arrangements are handled sensitively	h. arranging access to Financial Hardship help	i. informing customers, employees, distributors and service suppliers about information and assistance available to people experiencing family violence	j. referring customers, employees and distributors to specialist services	k. supporting employees and distributors who: (i) are affected by family violence; or (ii) experiencing vicarious trauma after serving affected customers	Whether the webpage has a properly functioning 'Exit' button	Comment
				of domestic and family violence, how to identify the signs, how to engage effectively and appropriately, and how to apply the policy. Training is reviewed and updated 'regularly'.	can request a support person.		achieved. The policy also states that they are trained to look for the signs of violence.		situation. It does not refer to what options are available.					provide greater clarity around collection arrangements and what financial hardship help may be offered. *Note: If we were to assess the policy as a whole and against other policies, we would adjust the raw score to 4/11.

Appendix C: Ranked Score Tables

Ranked 2024 scores of original 47 benchmarked subscribers

Rank	Insurer	2024 Score	2021 Score
1	AssetInsure	11	11
=2	Nib	10.5	5.5
=2	Youi	10.5	9.5
=4	RACQ	10	5
=4	Tokio Marine	10	10
6	Allianz	9.5	6.5
=7	Aioi	9	9
=7	Great Lakes	9	9
=7	Munich Re	9	9
=10	AAI	8.5	8.5
=10	AIG	8.5	8.5
=10	Chubb	8.5	8.5
=10	RAC	8.5	4.5
=14	Insurance Australia	8	5
=14	Insurance Manufacturers	8	5
=16	Berkshire Hathaway	7.5	7.5
=16	Petsure	7.5	7.5
=16	RACT	7.5	8
=19	Cover-more	7	7
=19	QBE	7	2
=19	QBE Lenders Mortgage	7	2
=22	Defence	6.5	6.5
=22	Helia	6.5	6.5
=22	Hallmark	6.5	2
=22	Open Insurance	6.5	6.5
=22	Hollard	6.5	6.5
=22	Zurich	6.5	6.5
=28	NTI	6	6
=28	Swiss Re	6	6
=30	PD	5.5	5.5
=30	Virginia Surety	5.5	5.5
=30	Arch	5.5	5.5
=33	Southern Cross	5	4
=33	Westpac	5	5

=35	Auto & General	4.5	4.5
=35	LFI	4.5	4.5
=37	AI	4	4
=37	Guild	4	4
39	Lloyds	3.5	3.5
=40	Creditcorp	3	3
=40	RAA	3	3
=40	Domestic and General	3	3
43	Ansvar	2.5	2.5
44	Mitsui Sumitomo	2	2
45	Catholic	1	7
46	Eric	0	2.5

Note: Commonwealth is no longer a subscriber

Ranked 2024 scores of newly identified subscribers

Rank	Insurer	2024 Score
1	Sunderland Marine	9.5
2	Sompo Japan	8.5
=3	Pacific International	5
=3	XL	5
5	ANZ Lenders Mortgage	1.5
=6	Lawcover	0
=6	Factory Mutual	0
=6	HDI Global	0

Ranked 2024 scores of all 55 subscribers

Rank	Insurer	2024 Score	2021 Score
1	AssetInsure	11	11
=2	Nib	10.5	5.5
=2	Youi	10.5	9.5
=4	RACQ	10	5
=4	Tokio Marine	10	10
=6	Allianz	9.5	6.5
=6	Sunderland Marine	9.5	n/a
=8	Aioi	9	9
=8	Great Lakes	9	9
=8	Munich Re	9	9
=11	AAI	8.5	8.5

=11	AIG	8.5	8.5
=11	Chubb	8.5	8.5
=11	RAC	8.5	4.5
=11	Sompo Japan	8.5	n/a
=16	Insurance Australia	8	5
=16	Insurance Manufacturers	8	5
=18	Berkshire Hathaway	7.5	7.5
=18	Petsure	7.5	7.5
=18	RACT	7.5	8
=21	Cover-more	7	7
=21	QBE	7	2
=21	QBE Lenders Mortgage	7	2
=24	Defence	6.5	6.5
=24	Helia	6.5	6.5
=24	Hallmark	6.5	2
=24	Open Insurance	6.5	6.5
=24	Hollard	6.5	6.5
=24	Zurich	6.5	6.5
=30	NTI	6	6
=30	Swiss Re	6	6
=32	PD	5.5	5.5
=32	Virginia Surety	5.5	5.5
=32	Arch	5.5	5.5
=35	Pacific International	5	n/a
=35	Southern Cross	5	4
=35	Westpac	5	5
=35	XL	5	n/a
=39	Auto & General	4.5	4.5
=39	LFI	4.5	4.5
=41	AI	4	4
=41	Guild	4	4
43	Lloyds	3.5	3.5
=44	Creditcorp	3	3
=44	RAA	3	3
=44	Domestic and General	3	3
47	Ansvar	2.5	2.5
48	Mitsui Sumitomo	2	2
49	ANZ Lenders Mortgage	1.5	n/a
50	Catholic	1	7
=51	Eric	0	2.5
=51	Lawcover	0	n/a

=51	Factory Mutual	0	n/a
=51	HDI Global	0	n/a

Note: Commonwealth is no longer a subscriber