

FAMILY VIOLENCE, SUPPORTING VULNERABLE CLIENTS AND FINANCIAL HARDSHIP POLICIES

Introduction

This document sets High Street Underwriting Pty Ltd's T/as Altamont Contingency Underwriting commitment to victims of family violence, supporting vulnerable clients and financial abuse. It is regularly reviewed and has been endorsed by our Directors and Responsible Managers. Our Board and senior management receive regular reporting on matters relating to victims of family violence, supporting vulnerable clients and financial abuse and have ultimate accountability for this Policy.

This Policy has been developed to comply with the General Insurance Code of Practice (the Code) and sets out how Altamont Contingency Underwriting identifies and supports family violence, vulnerable Clients and those affected by Financial Hardship. Any reference to "Clients" includes clients of Altamont Contingency Underwriting as well as any other individual entitled to assistance under the Code. This could include individuals who we are seeking to recover money from as we believe they have caused damage to an insured Client.

The purpose of this Policy is to inform all our staff, management, stakeholders and customers of our approach to identifying and supporting people affected by family violence, vulnerable clients, financial abuse and hardship.

FINANCIAL ABUSE AND HARDSHIP POLICY

We recognise that domestic and/or financial abuse is a serious and prevalent issue in Australian society. We acknowledge that domestic violence means much more than physical violence. It includes emotional abuse, psychological abuse, sexual abuse, financial or economic abuse and damage to property. We consider that the safety of our customers affected by domestic and financial abuse is paramount.

In Australian law, 'family violence' is defined as "violent, threatening or other behaviour by a person that coerces or controls a member of the person's family... or causes the family member to be fearful."

At Altamont Contingency Underwriting we aim to provide our affected customers with safe, supportive, timely and flexible assistance.

For this Policy our "customers" are an individual insured, a third-party beneficiary, a potential customer or an individual an insurer is seeking to recover money from.

We have appointed two Domestic and Financial Abuse Officers (DFA Officers) who are responsible for:

- ensuring that our staff are aware of the contents of this Policy and of our commitment to victims;
- ensuring that staff undertake appropriate training;
- monitoring compliance with this Policy;
- regularly reporting on compliance to senior management and our Board; and
- reviewing and updating this Policy on a regular basis.

Our DFA Officers can be contacted at 1800 096 829.

Training

We provide training to all relevant members of our staff. The training is designed to ensure that our staff:

- recognise domestic and financial abuse;
- understand the consequences of domestic and financial abuse;
- understand how to engage effectively and appropriately with affected customers; and
- understand how to apply this policy.

Confidentiality

We recognise the importance of protecting the private and confidential information of our customers affected by domestic or financial abuse. We are committed to ensuring confidentiality is maintained.

We will work with you to ensure confidentiality. This could include assisting you to change access to our systems, updating your contact details, offering different methods of communication and agreeing to the appointment of a trusted person to act on your behalf.

Disclosure

We understand the need for us to minimise the information that we require customers affected by domestic or financial abuse to disclose and the number of times they are required to disclose information about their situation.

When customers have been recognised as being affected by domestic or financial abuse, we have processes in place to limit the extent of disclosure.

Claims

We do not have any authority to manage claims on behalf of insurers. Details of who to contact for claims assistance, should contact our office on 1800 096 829.

Financial Hardship and Collection arrangements

If a customer is identified as being affected by domestic or financial abuse then we will make suitable enquiries with the customer about their financial situation to determine whether they are experiencing financial hardship.

We understand that financial hardship can affect anyone. We will treat our customers with respect, empathy and understanding and will work with them to identify the type of support they require.

We will assist our customers to complete a financial hardship application form and gather supporting documents. We will fast track any financial hardship request and provide options to retain their insurance policy if they say they cannot pay their premium.

Where we become aware that a customer's debt involves a situation of domestic or financial abuse then will not refer the debt on to a third-party debt collection agency. We will consider the risks involved in attempting to recover debts in these situations.

Sometimes customers may need extra help to get through a difficult time. Free, confidential, independent financial advice is available from Financial Counselling Australia or call the national financial counselling hotline on 1800 007 007.

FAMILY VIOLENCE, SUPPORTING VULNERABLE CLIENTS POLICY

Altamont Contingency Underwriting is committed to exercising greater care when dealing with vulnerable Clients. A person may be vulnerable due to a range of factors, including:

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

Policy Statement

Altamont Contingency Underwriting has a long-standing commitment to conducting its business with honesty and integrity and remains committed to full compliance with the Code and informing Clients, employees, *and* service suppliers about information and assistance available to vulnerable people and Family Violence.

This policy and the Altamont Contingency Underwriting internal policy and training programs assist our employees to:

- Identify and understand if a Client may be vulnerable;
- determine how best, and to what extent, they can support a vulnerable Client;
- take account of a Client's particular needs or vulnerability; and
- engage with a vulnerable Client with sensitivity, dignity, respect and compassion. This may include arranging additional support and referring the Client to specialised people or services.

Altamont Contingency Underwriting may need to be flexible and vary the approach based on individual circumstances, including providing more personalised support to help navigate our processes and working within any processes and procedures set by our security partners.

Family Violence

In Australian law, 'Family Violence' is defined as:

"violent, threatening or other behaviour by a person that coerces or controls a member of the person's family or causes the family member to be fearful."

Family Law Act 1975 (Cth), section 4AB

Website link: <https://guides.dss.gov.au/family-assistance-guide>

Family Violence means much more than physical violence. It includes:

- emotional abuse, psychological abuse, sexual abuse, financial or economic abuse; and
- damage to property.

The way employees deal with Clients who may be affected by Family Violence must facilitate, rather than act as a barrier to identifying Family Violence and improve the experience of those affected by Family Violence.

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

Altamont Contingency Underwriting recognises that Family Violence is unacceptable in any relationship and Clients experiencing Family Violence will be treated with dignity and respect.

The support of Clients experiencing Family Violence and their family is the highest priority. Clients who indicate or disclose Family Violence are able to access support from Altamont Contingency Underwriting that is appropriate to their circumstances.

Assisting Clients

Altamont Contingency Underwriting can assist vulnerable clients or Family Violence by:

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

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

The Client must be informed of this action.

Third Parties

If Altamont Contingency Underwriting is advised or we identify that a client or potential client requires support from a third party (e.g.: lawyer, interpreter, or friend) we will make reasonable accommodations to allow for this.

Training

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

Altamont Contingency Underwriting will aim to ensure that all employees and have been trained and receive ongoing training so that they:

- are aware of Altamont Contingency Underwriting policies and procedures when they are engaging with vulnerable Clients;
- identify vulnerable Clients, including those affected by Family Violence;
- deal appropriately and sensitively with vulnerable Clients; and
- apply the Family Violence & Supporting Vulnerable Clients policy and related policies and procedures relevant to their role in dealing with Clients.

Training is aimed at assisting employees to reduce the impact of vulnerability and Family Violence on Clients.

Reporting

Any notification of Vulnerability received by a member of staff must be reported immediately to either our Chief Executive Officer or our Compliance Manager.

Assistance in respect of Financial Hardship, Vulnerable Clients of Family Violence

Should any person require additional assistance, help is available from a number of specialist services:

1800RESPECT - telephone or online counselling, information on safety planning, and information on how to support someone who is experiencing domestic and family violence. Call 1800 737 732.

Lifeline - 24-hour crisis support and suicide prevention services. Call 13 11 14.

Mensline Australia - national telephone and online support, information and referrals for men with family and relationship concerns. Call 1300 789 978.

Child Protection Helpline – 132 111

Kids Helpline - telephone and online counselling service specifically for young people aged between 5 and 25. Call 1800 551 800.

Australian Childhood Foundation- counselling for children and young people affected by abuse. Call 1300 381 581.

Beyond Blue - 1300 224 636 - 24/7 support to people experiencing anxiety or depression.

National Association of Community Legal Centres - <http://www.nacclc.org.au/> An independent not-for-profit community organisation that provides legal and related services to the public, focusing on the disadvantaged and people with special needs.

National Debt Hotline - 1800 007 007 - Financial counselling is a free, confidential service to assist people in financial difficulty.

ACT	Legal Aid ACT - 1300 654 314 Domestic Violence Crisis Service – 02 6280 0900 (24/7)
NSW	Legal Aid NSW – 1300 888 529 Domestic Violence Line – 1800 656 463
NT	Northern Territory Legal Aid Commission – 1800 019 343 Domestic Violence Lifeline – 131 114 (24/7)
QLD	Legal Aid Queensland – 1300 651 188 DV Connect Crisis Support – 1800 811 811 (24/7)
SA	Legal Services Commission of South Australia – 1300 366 424 Women's Safety Services – 1800 800 098 (24/7)
TAS	Legal Aid Commission of Tasmania – 1300 366 611 Family Response and Referral Line – 1800 633 937 (24/7)
VIC	Victoria Legal Aid – 1300 792 387 Safe Steps Family Violence Response Centre – 1800 015 188 (24/7)
WA	Legal Aid WA – 1300 650 579 Women's Domestic Violence Helpline – 1800 007 339 (24/7)

