



Domestic and Family Violence Policy

Prepared October 2021

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1. Introduction

- 1.1 This document is the Domestic and Family Violence Policy.
- 1.2 The purpose of this policy is to outline the principles and minimum standards that must be followed to:
 - Where Domestic and Family Violence (DFV) has been disclosed to or identified to us, take reasonable steps to provide extra support to customers affected by DFV. The steps taken will be in a manner that is sensitive to the customers' situation and minimises the risk of further abuse and harm; and
 - Foster a workplace culture where employees affected by DFV are supported in the workplace, contributing to a healthy and safe working environment for all.
- 1.3 Youi recognises that DFV is serious and prevalent in the community and we are committed to taking extra care with customers and employees who experience DFV.
- 1.4 DFV refers to violence, abuse, threats or other behaviour between family members (for example children and parents) or between people in an intimate relationship where fear, physical and/or psychological harm is caused.
- 1.5 DFV may include physical, emotional, financial, sexual, social, technology-facilitated or spiritual abuse, threats, harassment, isolation, and control within families and domestic partnerships. It is immoral, violating human rights, and often criminal. It has devastating consequences on those who have experienced it, as well as on their families and communities.
- 1.6 DFV can affect people of all cultures, religions, ages, genders, sexual orientations, educational backgrounds and income levels.
- 1.7 DFV can be temporary, and our specialist teams are trained to recognise that this may not always be an inherent part of that person, that circumstances change and to share the support Youi may be able to provide.
- 1.8 This policy supports Youi's values and culture, high standards of conduct and the ethical behaviour that is expected of all Youi employees.

2. Scope

- 2.1 This policy applies to the Youi Group, consisting of Youi Holdings Pty Ltd ("**Company**") and each of its subsidiaries. "**Companies**" or "**Youi Group**" in this document means each of the Companies and each subsidiary.
- 2.2 It incorporates the OUTsurance group requirements, as far as applicable.
- 2.3 This policy applies to all Youi Group employees, service providers, and contractors in all Youi Group locations. Youi's directors are also subject to this policy.
- 2.4 All Youi employees are required to abide by this policy.
- 2.5 It is important that all Youi employees ensure they understand what DFV is and the requirements of this policy.
- 2.6 Youi's values and expected risk underpin compliance behaviours and community expectations. Failing to comply may result in disciplinary action, including loss of performance payments and termination of employment.
- 2.7 The Youi Code of Conduct contains guidance on the process of disclosing a breach to this policy. The raising of breaches, or potential breaches, of a Youi policy forms an integral part of Youi's risk management framework.

3. Definitions

3.1 Terms not defined below may be defined throughout this document.

3.2 **“Company”**: Youi Holdings Pty Ltd (ABN 41 124 972 425), an Authorised Non-Operating Holding Company on and from 1 March 2008 under section 18 of the Insurance Act 1973 and the Level 2 Head of the Youi Group comprising itself and its subsidiaries being:

- Youi Pty Ltd (ABN 79 123 074 733) (**“Youi”**), authorised to carry on insurance business in Australia on and from 1 March 2008 under Section 12 of the Insurance Act 1973;
- Youi NZ Pty Limited (CN 4476298) (**“Youi NZ”**), a non-regulated subsidiary, which provides call centre services to Youi;
 - Youi Properties Pty Ltd (ABN 604 123 873), a non-regulated subsidiary of Youi; and
 - Youi Holdings Share Option Plan Managers Pty Ltd (ACN 131 122 908), a non-regulated subsidiary, which acts as trustee under a Trust Deed dated 30 May 2008 for purposes related to an employee share option plan established by the Company.

3.3 **“Companies”** or **“Youi Group”**: each of the Companies and each subsidiary.

3.4 **“OUTsurance”**: OUTsurance Holdings Ltd (Reg No. 1997/022260/06, South Africa), which holds the majority of the shares in the Company through OUTsurance International Holdings Pty Ltd (Reg No. 2007/004026/07, South Africa). Rand Merchant Investment Holdings Limited (Reg No. 2010/005770/06, South Africa) (**“RMIH”**) is the ultimate holding company of the Company.

3.5 **“Domestic and family violence” (DFV)**:

- Domestic violence means “violence, abuse, threatening or other behaviour between people who are currently, or have previously, been in an intimate relationship”. The perpetrator uses violence and abuse to control and dominate the other person. This causes fear, physical harm, and/or psychological harm.
- Family violence means a person who exhibits “violent, threatening, or other behaviour by a person that coerces or controls a member of the person’s family or causes (them) to be fearful.”
- DFV can take many forms, including but not limited to:
 - economic (financial) abuse,
 - emotional (psychological) abuse,
 - physical and sexual abuse,
 - technology-facilitated abuse,
 - social abuse,
 - spiritual abuse, and/or
 - verbal abuse.

- 3.6 “Customer”:** A person holding or enquiring about holding a Youi insurance product, an authorised person on a Youi insurance policy, or a person who is not insured with Youi but to whom the benefit of a Youi policy extends.
- 3.7 “Economic abuse”:** Economic abuse (also called financial abuse) is abuse that undermines the victim’s ability to leave the situation, or efforts to become economically independent. Examples include coercing someone to put debts in their name, changing asset ownership without their permission, refusing to pay bills or provide money for living expenses, restricting access to bank accounts, identity theft to secure credit, or preventing a person from obtaining employment.
- 3.8 “Emotional abuse”:** Emotional abuse (also called psychological abuse) is abuse that subjects a person, or exposes them, to behaviour that may result in psychological trauma including anxiety, chronic depression, or post-traumatic stress disorder. Examples include stalking, online humiliation and intimidation, telling them what to wear, constantly undermining their self-esteem and self-worth.
- 3.9 “Financial abuse”:** See “economic abuse”.
- 3.10 “Psychological abuse”:** See “emotional abuse”.
- 3.11 “Physical abuse”:** Means when a person uses physical force against another person. Physical abuse can start slowly and inconspicuously and get more intense or worse over time. Examples include slapping, punching, kicking, spitting, scratching, trying to strangle or choke, driving dangerously, destroying property, belongings, or throwing things, locking someone out of the house or in the house, food deprivation, physical restraint, using weapons.
- 3.12 “Sexual abuse”:** Sexual abuse is any form of forced or unwanted sexual activity. The perpetrator of sexual abuse may use physical force, make threats, or take advantage of a person unable to give consent. It can lead to long-term mental health issues. Examples include rape, unwanted touching, forced sex without protection, assaulting the genitals, sexual jokes.
- 3.13 “Social abuse”:** Means when a perpetrator prevents a person from spending time with family and friends or participating in social activities. By isolating a person from their support networks, the perpetrator is attempting to assert power and control. Examples include deciding who a person can talk to and spend time with, continuously criticising the person’s friends and family, moving the person far away.
- 3.14 “Spiritual abuse”:** Is the denial or use of spiritual or religious beliefs and practices to control and dominate a person. It can impact the person’s self-esteem and confidence, make them feel guilty, damage their spiritual experiences and isolate them. Examples include preventing someone from practicing their religion, ridiculing someone’s understanding of religious practices or beliefs, forcing someone to act against their spiritual or religious obligations.
- 3.15 “Technology-facilitated abuse”:** Is when someone harasses, threatens, monitors or impersonates another person continually using technology. Examples include constantly leaving phone messages, texts, emails, social media comments, tracking a person’s whereabouts using mobile apps, tracking via online banking, hacking into a person’s accounts (email, social media, policy, bank accounts), restricting access to technology (e.g. mobile phone), revenge porn, posting false information about someone, pretending to be someone else in order to monitor a person.

- 3.16 “Verbal abuse”:** Is a key feature of emotionally abusive relationships. The perpetrator consistently makes statements that negatively label a person. This has serious impact on self-esteem and confidence of the victim. Examples include name-calling, continuous criticism, yelling.

4. Policy Principles and Standards

The policy principles and standards are designed to act as a minimum standard for meeting Youi’s obligations to support customers and employees who experience DFV.

4.1 PRINCIPLE 1: Identification of domestic and family violence

4.1.1 Kinship or marriage is not the only connection to DFV, but may also include:

- Past or current intimate relationships – including people who are dating or living together, regardless of their gender or sexuality, or whether the relationship is of a sexual nature;
- Relationships involving carers – where care is provided to older people, people with a disability or a medical condition;
- Relatives and guardians;
- Aboriginal and Torres Strait Islander concepts of family, including extended family; and
- Other culturally-recognised family groups.

4.1.2 We will be vigilant for signs of possible DFV. DFV is challenging to identify. However, early recognition can help reduce the impact of the violence. There are signs of possible DFV which may help in protecting customer or employee safety and privacy as quickly and appropriately as possible. These signs may include, but are not limited to the following:

For customers

- Express concerns about their privacy, safety or the disclosure of information to another person on the policy;
- Appears reluctant to involve another party associated with the service, such as an authorised policyholder; or
- Mentions that an intervention order / apprehended domestic violence order (or equivalent) is, or has recently been, in place.

For employees

- Excessive absences or lateness;
- A sudden or sustained drop in productivity;
- Frequent unexplained bruises or injuries or wearing concealing clothing, even in warm weather;
- Displaying anxiety, or appearing distracted, depressed or overly jumpy; or
- Receiving excessive personal calls or texts.

4.2 PRINCIPLE 2: Disclosures of domestic and family violence

- 4.2.1** We will handle all disclosures with sensitivity and respect. We understand it takes incredible courage for a person to make a disclosure of domestic or family violence.
- 4.2.2** We will treat disclosures of DFV as sensitive personal information and to be kept confidential, except when the law requires disclosure.
- 4.2.3** Employees can make a disclosure of DFV to their direct manager, any Youi Executive Committee member or to Human Resources. Procedures must be in place for employees to discuss any issues relating to DFV.
- 4.2.4** Customers may make a disclosure of DFV to any Youi employee. Procedures must be in place for employees to know how to respond to these disclosures
- 4.2.5** Customers may make a disclosure of DFV to any Youi service provider. Procedures should be in place for service providers to know how to respond to these disclosures.
- 4.2.6** If a customer identifies and discloses that they are impacted by DFV and request additional information or services, employees are to refer them to external support agencies (Appendix A) for non-general insurance matters.
- 4.2.7** Safety is paramount for anyone affected by family violence. If an employee or service provider believes a customer or employee or any other person is in immediate danger, the matter should be referred to the Police.

4.3 PRINCIPLE 3: Taking extra care with customers who are affected by domestic and family violence

- 4.3.1** Customers affected by DFV must be treated fairly and sensitively by employees.
- 4.3.2** The customer knows their own experience. Every instance of DFV differs, and every customer knows best how to keep themselves safe. The first step is to check with the customer how they wish to proceed. We will inform customers of the options available to them and empower them to be able to choose the most appropriate help for them.
- 4.3.3** Across all contacts with a customer who has disclosed they are experiencing DFV, it is vital to ensure information being shared is not endangering them. Before any information is sent to a customer, it should be verified with the customer that the information will be sent in a safe way.
- 4.3.4** Customers who have disclosed they are experiencing DFV are referred to the Priority Assistance Team to support these types of vulnerable customers.

- 4.3.5** If the customer does not wish to, we will not require someone to explain that they are experiencing DFV more than once. The customer files will be flagged as being case managed, so they are always referred to the Priority Assistance Team.
- 4.3.6** We understand that safety and confidentiality is paramount when assisting customers who are at risk of harm. Firstly, we will check with the customer that all contact information on the account is accurate, to ensure the abuser's contact information is not listed. We do not want to put the customer at risk. We will discuss options with customers about additional steps available to protect their privacy and get their consent before applying these.
- 4.3.7** We will ensure the customer knows who is authorised on their policy and they can choose what action is appropriate to their circumstance. We will explain what the steps are and exactly what will happen (if the authorised representative will be notified). The customer has the option to remove an authorised representative.

4.4 PRINCIPLE 4: Taking reasonable steps to support customers who are affected by domestic and family violence

- 4.4.1** We will take reasonable steps to support customers who are affected by DFV. As a minimum, support measures available to customers affected by DFV can access are:

- Completing personal information updates when setting up new policies or changing policy information or during a claim. We understand that, when a person needs to change contact details because of an abuse situation, it is vital that these new details are kept private;
- Requesting to change the preferred communication recipient;
- Reviewing who is authorised to make decisions on the policy(ies);
- Discussing any additional account and ID check security measures;
- Providing a dedicated phone number to the Priority Assistance Team who are trained in supporting vulnerable customers; and
- Financial hardship assistance.

- 4.4.2** Other support options that may be considered to support customers affected by DFV include:

- Giving customers the option to change identity verification procedures so that they are not linked to a customer's personal details;
- Applying the financial hardship policy flexibly, on a case-by-case basis;
- Fast-tracking financial hardship requests when DFV is disclosed as an issue;
- Establishing arrangements with debt collection agencies so that, if they become aware of a DFV situation as part of their debt collection, they are required to inform Youi;
- Establishing arrangements for a cash settlement of a claim;
- Discussing a policy's premium pricing if an increase in premium is due to violent actions of another person;
- Reviewing a claim rejection decision when the damage is caused by any person who shows violence to the insured and is named on the policy as an authorised person; and

- Reviewing situations, according to State legislation, where tenants are victims of domestic violence and need to vacate the insured property because of any notices or orders issued by a Court of Law.

4.4.3 For those who have experienced family violence, we acknowledge documentation may be difficult to provide. We will take that into account when transacting a policy or a claim.

4.5 PRINCIPLE 5: Zero tolerance for family and domestic violence in the workplace

4.5.1 We are committed to providing a safe, respectful, and supportive workplace free from all forms of violence, including DFV.

4.5.2 We will not ignore or excuse DFV, or tolerate disrespectful behaviour such as offensive jokes, aggressive or demeaning behaviour, or discrimination. All employees are required to show behaviour that does not support or promote DFV (or any other form of violence).

4.5.3 We will not tolerate any employee perpetrating family and domestic violence in the workplace.

4.5.4 We will take immediate action if any potentially dangerous or threatening instances of domestic or family violence arise within the workplace.

4.5.5 Youi's Whistle-blower Policy outlines how to disclose (internally or externally) actual or suspected improper conduct.

4.6 PRINCIPLE 6: Supporting Youi employees who are affected by domestic and family violence

4.6.1 We will not treat an employee adversely or badly because of their disclosure of, experience of, or perceived experience of DFV. An employee retains the right to raise any grievances to HR, as outlined in the Workplace Grievance Policy.

4.6.2 We will not discriminate against a victim of DFV in hiring, staffing, or other terms, conditions, or privileges of employment.

4.6.3 Work performance of an employee may be impacted by DFV. If a disclosure has been made, it may be possible to discuss and, where appropriate and necessary, agree additional support and reasonable role changes for some time. We may need to conduct regular reviews, a return to workplace or a performance improvement process.

4.6.4 We will provide support to employees affected by family and domestic violence. As a minimum, employees affected by family and domestic violence can:

- Take paid or unpaid “family and domestic violence leave” in accordance with Youi Leave Policies and the employees Employment Agreement;
- Request flexible working arrangements;
- Take paid or unpaid personal / carer’s leave, in certain circumstances; or
- Access support from the Employee Assistance Program (EAP).

4.6.5 Other support options that may be considered on a case-by-case basis to support employees affected by DFV include:

- Having the Courts list the workplace included in a Domestic Violence Order (or similar), where appropriate; and
- Role adjustment or support measures for an agreed specified period of time, such as:
 - Job redesign or change of duties,
 - Change to working hours or patterns of work, and/or
 - Change of work contact details.

4.6.6 Human Resources will take measures to support an employee and, when agreed, will document, where appropriate.

4.6.7 We will take reasonably practical steps to keep any information about an employee’s situation confidential.

4.6.8 When considering support options outlined in 4.6.4, we acknowledge that employees affected by DFV may not be in a position to provide supporting documentation. Youi should not deny an employee’s access to leave and other support options because of the lack of supporting documentation.

4.7 PRINCIPLE 7: Training and awareness

4.7.1 We will ensure this policy is published on Youi’s external website.

4.7.2 We will ensure that all employees are made aware of this policy in their induction process.

4.7.3 As a minimum, all employees are required to complete mandatory awareness training about DFV, how this may affect customers and employees, recognising the signs of abuse and knowing the support measures Youi has in place.

4.7.4 People managers will be provided with guidance on how to recognise the signs of abuse and how to conduct conversations, how to treat the sensitive information confidentially and with respect and where to direct employees for additional support, including both internal resources such as the EAP and external support agencies (refer to Appendix A).

- 4.7.5** Designated DFV responders must complete specialist training in how to handle DFV issues sensitively and appropriately.
- 4.7.6** Youi's service providers must be made aware of who they are to inform within Youi if a disclosure from a customer about DFV is received. As a minimum, Youi's service providers must be made aware of this policy on Youi's website.

5. Policy Governance Review

5.1 Policy implementation

- 5.1.1** Senior Executives must establish, review and maintain appropriate operating processes and procedures to ensure this policy is implemented effectively across their business areas.

5.2 Policy exemptions

- 5.2.1** Policy exemptions may be granted where:
 - a) there is a legitimate reason for not meeting a principle or requirement of a policy; and
 - b) the provision of such an exemption will not breach any legislative obligations.

- 5.2.2** The Head of Compliance must review exemption requests, as a minimum.

5.3 Policy monitoring and assurance

- 5.3.1** Compliance will monitor and review compliance with this policy as a part of its overall compliance monitoring program.

5.4 Policy awareness and risk culture

- 5.4.1** As a minimum, the policy must be available to employees on the internal policy register.
- 5.4.2** Appropriate training or awareness programs must be in place to ensure that people who are in scope of this policy have the relevant skills and knowledge to understand and fulfil their obligations.
- 5.4.3** Ethical compliance behaviours and performance of people in scope of this policy are to be regularly reviewed. Appropriate education and communication around this policy will be used to support and enhance a strong risk culture and embed by Youi's values.

5.5 Policy breaches

- 5.5.1** The Head of Compliance and General Counsel will complete an assessment to determine if the breach is a reportable breach.

5.6 Reporting

- 5.6.1** As a minimum, any identified issues or compliance incidents must be managed as per the requirements in the Compliance Management Policy.
- 5.6.2** Internal management reporting and escalations must, as a minimum, follow requirements as outlined in the Compliance Management Policy and Risk Management Framework to provide an appropriate level of senior management oversight.

6. Related Legislation and Documents

6.1 This policy aims to align with the following legislation and standards:

Jurisdiction	Mandate
Australia	<ul style="list-style-type: none">• Australian Criminal Code Act 1995• Fair Work Act 2009• General Insurance Code of Practice 2020• Fair Work Ombudsman “Employer guide to family and domestic violence”• Privacy Act 1988• Family Law Act 1975 (Oth)• Corporations Act 2001, Chapter 7
New Zealand	<ul style="list-style-type: none">• Domestic Violence – Victim’s Protection Act 2018• Employment Relations Act 2000• Human Rights Act 1993• Privacy Act 1993
South Africa	<ul style="list-style-type: none">• Protection of Personal Information Act 2013

7. Document Control

7.1 Identification and approval

Document Name (Id)	Domestic and Family Violence Policy
Document Owner	Chief Operating Officer
Document Owner	Internal Risk Committee

7.2 Revision history

Version	Date	Drafted by	Reviewed by	Comments
0.1	8/6/2020	Russell Mills, Head of Investigations Kate Gordon, Head of Compliance	Peter Broome, Chief Operations Officer Bert Bakker, Chief Risk Officer	New Policy, aligned to Code requirements.
2.0	11/10/2021	Jaymee Martin, Head of Recoveries & Settlements Russell Mills, Head of Operational Excellence	Peter Broome, Chief Operations Officer	Updated to align with regulatory requirements for Claims Handling as a Financial Service.

7.3 Approval history

Approved by	Version tabled	Version approved	Date approved
Internal Risk Committee	0.1	0.1	15/06/20
Internal Risk Committee	2.0	2.0	19/10/2021

8. Appendix A – Resources

- Domestic And Family Violence Helpline for Family & Friends / <https://www.dss.gov.au/women/help-is-here-campaign>
- Mission Australia / <https://www.missionaustralia.com.au>
- White Ribbon Australia / <https://www.whiteribbon.org.au/find-help/>
- Lifeline / <https://www.lifeline.org.au/get-help/topics/domestic-family-violence>
- 1800RESPECT / 1800RESPECT.org.au
- EAP (Australia and New Zealand) / www.benestar.com
- EAP (South Africa) / Phone: 0800 611 238